GAO

Testimony

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COAST GUARD

Civil Rights Directorate's Action Plans to Improve Its Operations Could Be Strengthened by Implementing Several Aspects of Project Planning and Implementation Practices

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Strategic Issues

GAO
Accountability ★ Integrity ★ Reliability

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COAST GUARD

Civil Rights Directorate's Action Plans to Improve Its Operations Could Be Strengthened by Implementing Several Aspects of Project Planning and Implementation Practices

Why GAO Did This Study

Allegations of management weaknesses, unsecured personal information, and employee dissatisfaction have been made against U.S. Coast Guard's Civil Rights Directorate (CRD). To address these allegations, the Director of CRD commissioned an external review of civil rights operations. In February 2009, the review made 53 recommendations to improve the civil rights operations. CRD developed action plans to address these recommendations. As requested, GAO reviewed (1) how Coast Guard's action plans align with EEOC's elements of a model equal employment opportunity program (2) how Coast Guard developed and reviewed its action plans, and (3) the extent to which Coast Guard's action plans align with generally accepted project management practices. To conduct this work GAO reviewed documentation from CRD, EEOC, internal control standards, and literature on project management. We also interviewed CRD officials.

What GAO Recommends

GAO recommends that the Department of Homeland Security direct the Commandant of the Coast Guard to take the following actions: (1) going forward, ensure internal controls are in place to maintain the documentation necessary to facilitate oversight, (2) establish measurable performance goals for the action plans, and (3) define an evaluation plan for each action plan. DHS concurred with all GAO recommendations.

View GAO-10-571T or key components.
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What GAO Found

Of the Equal Employment Opportunity Commission's (EEOC) six equal employment opportunity program model elements, CRD's action plans focus mainly on the first—agency leadership. Of the 29 action plans developed and implemented by CRD to address the 53 recommendations in the recent external review, almost half center on the leadership element. For example, one action plan involved scheduling training for headquarters and field staff.

CRD took several steps to develop and review action plans to address recommendations from the external review, such as developing a functional review team, assigning project officers, meeting with the Commandant and agency leadership, and consulting the agency financial officer. However, CRD did not consistently document key decisions related to the development and review of the action plans as recommended in federal internal control standards. As a result, CRD lacks transparency and accountability to stakeholders. Lack of documentation also impedes the ability to track progress, make mid-course corrections, and illustrate to stakeholders that it is effectively solving these issues. According to CRD officials, their priority was to complete the action plans in a timely manner rather than ensure that development and review processes were documented.

GAO reviewed four of CRD's action plans in relation to generally accepted project management practices to determine the extent to which recommended practices were followed. The recommended practices are: (1) identifying measurable performance goals, (2) defining specific tasks, (3) identifying the person(s) accountable, (4) identifying interim milestones and checkpoints, (5) identifying the needed resources, (6) consulting stakeholders, and (7) defining how to evaluate success. The selected action plans showed some elements of the project management practices, such as identifying accountable individuals, but fell short in relation to other elements. Specifically, performance goals were identified in the form of a product, such as development of a manual, rather than in relation to a desired outcome, such as demonstrating an increase in the number of staff who know how to properly safeguard personal information. All four action plans we reviewed lacked plans for evaluating their success. CDR officials stated that they were more focused on completing the plans rather than evaluating them, but early evaluation can identify and guide mid-course corrections to ensure positive change.

Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to discuss the approach the Civil Rights Directorate (CRD) of the U.S. Coast Guard has taken to improve the operations of its civil rights program. According to CRD, their mission is to foster and maintain a model workplace which supports mission execution. To accomplish this mission, CRD manages the Coast Guard Equal Employment Opportunity (EEO) program for civilian employees and the Equal Opportunity (EO) program for its military members. In advancement of these programs, CRD provides services such as an intake, mediation, and review process for military and civilian complaints for all Coast Guard personnel.

Under a prior Director, two separate external reviews of the civil rights operations made recommendations for improvement related to the CRD's organizational structure, complaint processes, and program effectiveness. More recently, allegations of management weaknesses, unsecured personal information, and employee dissatisfaction have been made against CRD. The current CRD Director commissioned a third external review and evaluation in September 2008 to improve the operations of the civil rights program. In February 2009, Booz Allen Hamilton (BAH) completed this review and made 53 recommendations, which were similar to those of the previous reports.[1] The Director of CRD subsequently developed action plans to address these recommendations.

As requested, my testimony today will describe (1) how Coast Guard's action plans align with the elements of a model equal employment opportunity program, (2) how Coast Guard developed and reviewed its action plans, and (3) the extent to which Coast Guard's action plans align with generally accepted project management practices.

To address all of the objectives, we reviewed the 2009 BAH report and recommendations and selected CRD action plans and supporting documentation to address the recommendations. In addition, to identify how Coast Guard's action plans focus on the elements of a model EEO program, we reviewed the Equal Employment Opportunity Commission's (EEOC) Management Directive-715 (MD-715), which established the

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[1]Booz Allen Hamilton, *U.S. Coast Guard Office of Civil Rights Program Review*, 2009. See appendix I for a list of the 53 recommendations to CRD.

elements.[2] In the absence of an EO framework of model elements, and given that CRD stated they apply the EEO model elements to all Coast Guard personnel, including military, we have used the EEO model elements framework to organize the actions plans.

To describe how the Coast Guard developed and established a project management process for its action plans, we obtained documentation from CRD officials on their organizational structure and review processes and interviewed CRD officials to supplement the documentation. To determine the extent to which Coast Guard's action plans are aligned with generally accepted project management practices, we reviewed prior GAO reports[3] and the Government Performance and Results Act (GPRA) of 1993,[4] and also conducted an external literature review to identify elements of successful project planning and implementation. Subsequently, we identified and adapted seven practices that are associated with generally accepted project management practices.[5] We analyzed the extent to which selected action plans contained seven practices associated with generally accepted project management practices. We also reviewed our prior work on the Coast Guard's modernization program[6] for context regarding the Civil Rights Directorate's restructuring action plan. We conducted semi-structured interviews with Coast Guard officials responsible for the design, implementation, and approval of action plans to address the recommendations.

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[2]MD-715 provides policy guidance and standards for establishing and maintaining effective affirmative programs of equal employment opportunity under § 717 of Title VII of the Civil Rights Act of 1964, as amended, and effective affirmative action programs under section 501 of the Rehabilitation Act of 1973, as amended. See, 42 U.S.C. § 2000e-16 and 29 U.S.C. § 791. We did not evaluate the extent to which CRD's action plans met the criteria for EEOC model elements.

[3]GAO, *Motor Carrier Safety: The Federal Motor Carrier Safety Administration Has Developed a Reasonable Framework for Managing and Testing Its Comprehensive Safety Analysis 2010 Initiative*, GAO-08-242R (Washington, D.C.: Dec. 20, 2007); and GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999). Internal control standards provide the overall framework for establishing and maintaining internal controls in the federal government.

[4]Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993).

[5]Project Management Institute, *A Guide to the Project Management Body of Knowledge (PMBOK)*, *First Edition (1996)*. We adapted the original language from PMBOK for the purposes of the GAO testimony.

[6]GAO, Coast Guard: *Observations on the Genesis and Progress of the Service's Modernization Program*, GAO-09-530R (Washington, D.C.: Jun. 24, 2009).

As part of our assessment, we selected and reviewed four action plans that are related to key issues identified in the external review. For example, the first three action plans relate to improving the consistency of EO/EEO service delivery throughout Coast Guard—a major issue identified in the third party review.[7] The selected plans encompass actions on 13 of the 53 recommendations and address major concerns with CRD's operations. We selected the following action plans:

- Completing a New Personally Identifiable Information (PII) Handbook;
- Restructuring Civil Rights Operations;
- Revising the EO Manual; and
- Training to Address Office Climate.

We conducted this performance audit from November 2009 through April 2010, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In brief, nearly half of the action plans align with strengthening the demonstrated commitment from leadership. Leadership commitment is an essential element of a model EEO program. While action plans and leadership commitment are critical, only effective implementation of solutions will resolve the CRD's long-standing issues. According to CRD officials, their priority was to address the recommendations and complete the planning and implementation of action plans in a timely manner. Although CRD established a planning and process management control group and focused on implementing and completing the action plans quickly, in many cases the CRD action plans lack documentation important to internal controls, and these plans could be improved by defining measurable outcome goals and plans for evaluation of action plan results. Without internal controls, such as timely and reliable documentation, CRD weakens transparency to stakeholders and loses a historical record of its implementation approach. Based on our review of the selected action plans, we recommend that, going forward, CRD: (1) ensure internal controls are in place to maintain the documentation necessary to facilitate oversight and course corrections as plans are

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[7]There are other action plans related to key issues identified in the external review that are not included in our review.

designed and implemented, (2) establish measurable performance goals for the action plans to support the management decision as to the completion status of the action plans, and (3) define an evaluation plan for each action plan to assess the degree to which the plan yielded the intended outcomes.

Background

The Coast Guard is one of the five armed forces of the United States and the only military organization within the Department of Homeland Security. Coast Guard is charged with carrying out 11 statutory missions with approximately 50,000 personnel: 42,000 active duty military and 8,000 civilians.[8]

CRD's mission is to foster and maintain a model EO/EEO workplace that supports mission execution. CRD's principal functions are to facilitate the Coast Guard's (1) EEO program for its civilian employees and (2) EO program for its military members. Under the EEO program, CRD is responsible for ensuring Coast Guard compliance with the federal statutes prohibiting employment discrimination as well as EEOC's regulations and directives, including MD-715, which explains the basic elements necessary to create and maintain a model EEO program. Under the EO program, while military members are not covered by the antidiscrimination statutes and EEOC regulations and directives, Coast Guard policy provides that military equal opportunity policies are generally based upon principles set forth in civilian EEO policy, including affording military members with discrimination complaint procedures that mirror the EEO process to the extent possible.

CRD is led by a Director who reports to the Commandant of the Coast Guard and is responsible for all EEO/EO activities within the Coast Guard. The Chief of the Office of Policy, Planning, and Resources reports directly to the Director of the CRD and serves as the acting Director in the Director's absence. The Office of Policy, Planning, and Resources also acquires, allocates, and oversees resources for CRD in compliance with the Chief Financial Office's policies. The Chief of the Office of Civil Rights Operations reports to the Director of CRD and oversees and manages all

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[8]Coast Guard's 11 missions are: (1) Ports, waterways, and coastal security, (2) Drug interdiction, (3) Aids to navigation, (4) Search and rescue, (5) Living marine resources, (6) Marine safety, (7) Defense readiness, (8) Migrant interdiction, (9) Marine environmental protection, (10) Ice operations, and (11) Other law enforcement. See, § 888 of the Homeland Security Act of 2002 (Pub. L. No. 107-296, 116 Stat. 2135, 2249 (2002)).

full-time 45 Coast Guard civil rights service providers through three Civil Rights Regional offices.

Figure 1: Organizational Chart of the Civil Rights Directorate
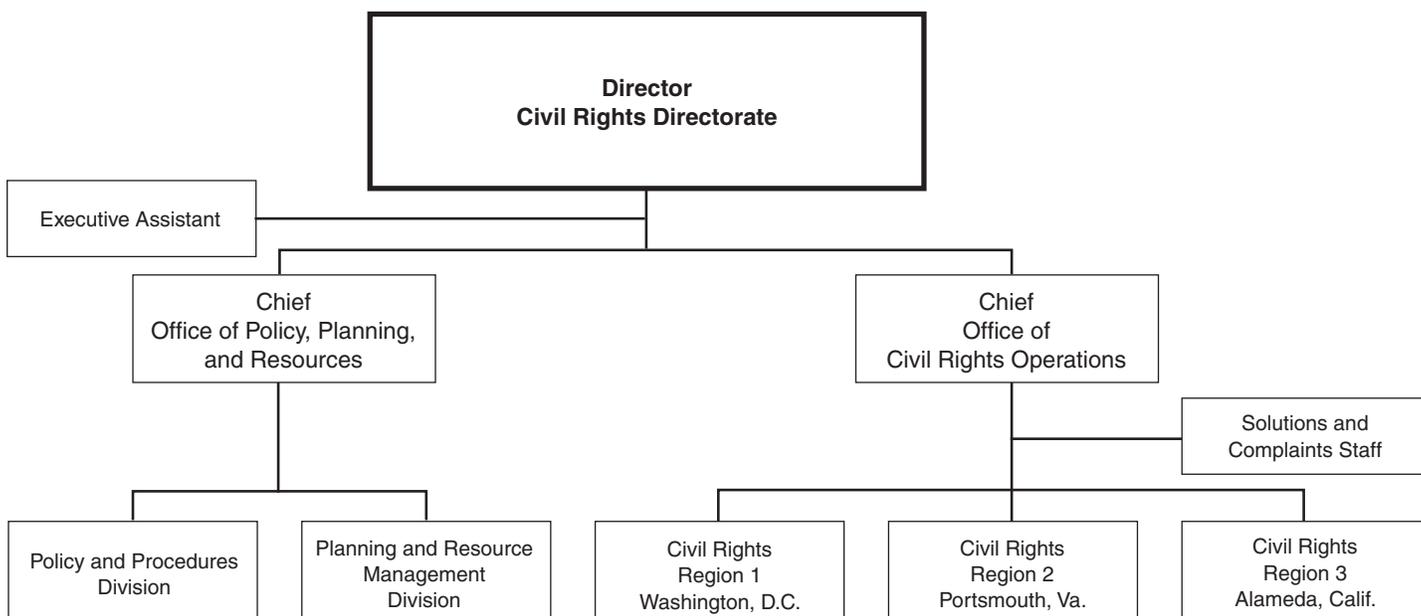
Source: GAO presentation of Coast Guard information as of September 30, 2009.

As stated previously, EEOC's MD-715 provides guidance to federal agencies to identify the basic elements necessary to create and maintain a model EEO program. EEOC instructions state that an agency should review its EEO and personnel programs, policies, and performance standards against six elements to identify where their EEO program can become more effective. The six essential elements EEOC describes for a model EEO program are:

- Demonstrated commitment from agency leadership,
- Integration of EEO into the agency's strategic mission,
- Management and program accountability,
- Proactive prevention of unlawful discrimination,
- Efficiency, and
- Responsiveness and legal compliance.[9]

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[9]See appendix II for a summary of the six model elements.

Agency Leadership Is the Primary EEOC Model Program Element Addressed by Coast Guard Action Plans

Over one-third of the 2009 recommendations dealt with agency leadership issues, as did the recommendations of the prior reviews. CRD developed 29 action plans to address the recent 53 recommendations, with 13 focusing on leadership. Table 1 shows a summary of the distribution of these action plans across EEOC's six model elements.[10]

Table 1: Distribution of CRD Action Plans across EEOC's Model Elements

EEOC's model elements	Number of action plans aligned with model element[a]
Demonstrated Commitment from Agency Leadership	13
Integration of EEO into Agency's Strategic Mission	5
Management and Program Accountability	2
Proactive Prevention of Unlawful Discrimination	0
Efficiency	4
Responsiveness and Legal Compliance	1

Source: GAO analysis based on EEOC's model elements and action plan alignment.

[a]Four of the 29 action plans did not align with any of EEOC's model elements.

The priority given by CRD to address agency leadership is based on the most recent recommendations they received and is also consistent with the focus of earlier third-party recommendations provided to the Coast Guard on EO/EEO issues.[11] According to EEOC, the leadership element of a model program includes allocating sufficient resources to the EEO program, such as personnel with training and experience, staff with relevant knowledge and skills, adequate data collection and analysis systems, and training programs for all employees. Issuing an effective EEO program policy statement and ensuring that all employees are informed of EEO programs are also part of the demonstrated commitment element. Examples of the action plans that focus on demonstrated commitment from agency leadership include:

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[10]The EEOC categories of model elements are not mutually exclusive and can be subject to interpretation.

[11]None of the action plans focus on proactive prevention of unlawful discrimination because no recommendations were made concerning this element. This does not imply that there should be plans focusing on proactive prevention or that the Coast Guard Civil Rights Directorate does not need to improve proactive prevention.

- Develop a comprehensive training program for Civil Rights Service Providers;
- Schedule Office of Civil Rights headquarters and field-level senior staff for the Center for Creative Leadership North America Leadership workshops; and
- Task regional managers with identifying skills and managing the training needs of their staffs.

Although CRD Established Processes to Develop and Review Selected Action Plans, Documentation of Key Decisions and Outcomes Needs Improvement

CRD took several steps to develop and review action plans to address recommendations from the most recent external review, such as developing a functional review team, assigning project officers, meeting with the Commandant and agency leadership, and consulting the agency financial officer. CRD officials stated that they organized with a sense of urgency to address the recommendations and complete their planning and implementation of action plans. The key players in the planning and implementation of action plans were:

- **Functional Review Team:** According to CRD staff, a team of senior CRD staff, called the "Tiger Team," was created to serve as the functional review team. This team aimed to effectively and efficiently address the recommendations with limited resources. Members of the Tiger Team included the Director of CRD, the executive assistant, the Chief of the Office of Policy and Planning, and Chief of the Office of Civil Rights Operations. The Tiger Team guided the development of the action plans and also reviewed and approved the implementation of the action plans. The Tiger Team formulated strategies to implement action plans, assigned project officers, set deadlines for project officers to complete action plans, and reviewed documentation submitted by project officers to support their position that an action plan was complete.

- **Project Officers:** Project officers, appointed by the Tiger Team, were responsible for providing weekly updates to the Tiger Team and for overseeing the execution of the action plans. CRD told us that the project officers were chosen based on their job responsibilities and knowledge of the subject matter. The project officers reported to the Tiger Team through an appointed lead project officer.

- **Commandant:** CRD staff told us that the Director and executive assistant met regularly with the Commandant to provide updates and receive feedback on the action plans. According to CRD staff, during these meetings the Commandant provided guidance on the action plans and helped formulate the decision on time frames to complete the action plans.

- **Agency Leadership:** Coast Guard leadership, including the Commandant, was involved mainly with the action plan to restructure civil rights operations. The Commandant charged the Leadership Council, an advisory body of the Coast Guard's senior leadership,[12] with evaluating CRD's organizational structure, human resource practices, and needs related to their EEO program, diversity, and climate, among other related responsibilities. CRD briefed the Leadership Council twice and the council provided guidance and feedback to CRD on aspects of the restructuring action plan.

- **Coast Guard's Restructuring Team:** The Commandant's Intent Action Order Reorganization Review Team is an intra-agency body that reviews organizational restructuring proposals for compliance with rules of engagement and conformity to overall Coast Guard organizational rules and policies. The review team's approval was necessary for CRD to restructure its operations; CRD completed a checklist that was required to gain the review team's approval.

- **Coast Guard Directorates:** CRD staff also met with senior officials in other directorates for feedback on action plans that related to their respective offices. For example, the Director and executive assistant met with Planning, Resources, and Procurement Directorate staff to review all the action plans for financial implications and to receive status updates from CRD on the execution of the action plans. The Planning, Resources, and Procurement Directorate staff advised the Commandant on the budget implications of the proposed action plans and recommended budget-related decisions. Although the Chief Financial Officer did not have approval responsibilities, he received periodic status updates from CRD on the execution of the action plans. CRD officials also stated that the Engineering and Logistics Directorate and the Command, Control, Communications, Computers and Information Technology Directorate reviewed the restructuring action plan.

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[12]The Leadership Council consists of the Commandant, Vice Commandant, Commanders (Atlantic and Pacific Areas), the Chief of Staff, and the Master Chief Petty Officer of Coast Guard.

CRD Did Not Consistently Document Key Decisions Related to the Development and Review of the Action Plans

When developing and reviewing the action plans, CRD did not maintain documentation as recommended in federal internal control standards.[13] As a result, CRD lacks transparency and accountability to stakeholders. Lack of documentation also impedes the ability to track progress, make midcourse corrections, and illustrate to stakeholders that it is effectively solving these issues. According to the internal control standards, accurate and timely documentation of actions and events is necessary for the management of an organization and for making effective decisions.

CRD was not able to provide documentation for recording minutes and decisions made at internal meetings, meetings with the Commandant, briefings to the Leadership Council, or meetings related to the action plans. They primarily tracked the action plans and the status of their completion through the functional review recommendation sheet. In addition, they used memos and e-mails to document some decisions and as a way to delegate responsibility.

- **The Functional Review Recommendation (FRR) Spreadsheet:** The FRR spreadsheet was the primary tool that CRD used to update the Commandant and CRD leadership on action plan development and implementation. The Tiger Team designed the FRR spreadsheet using the Commandant's guidance on important elements to track. For each recommendation, this spreadsheet included the responsible project officer, actions taken, the priority of the action plan, deadlines, days until deadlines, and completion status. After receiving status notes from the project officers through the CRD executive assistant, the lead project officer would update the FRR sheet by deleting previous entries in the "Action Taken" columns. As a result, CRD only has documentation of the most recent actions taken and in the future will not be able to assess the effectiveness of their approach to the action plans.[14] Decisions or directions from the Commandant as a result of these status reviews were not recorded.

- **Memos:** CRD used memos to document some decisions, such as the rationale behind restructuring the directorate, the assignment of a modernization officer to oversee the logistics of CRD's modernization, the Commandant's approval of resources for training, staffing, and other

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[13]GAO/AIMD-00-21.3.1.

[14]See appendix III for an excerpt from the Functional Review Recommendation Implementation Spreadsheet.

program support, and the assignment of a PII privacy officer to ensure that safeguards are in place for proper handling of complaint records.

- **E-mails:** CRD used e-mails to document when meetings were held and who was invited to meetings. CRD provided e-mails as the sole documentation of certain actions related to the planning and implementation of the action plans, such as the designation of tasks to staff, outreach to stakeholders, and submission of action plan status updates.

CRD officials stated that their priority was to complete the action plans in a timely manner rather than assure that development and review processes were documented. However, without timely and reliable documentation of decisions and actions, CRD cannot communicate or provide a historical track of its approach to the action plans. Ultimately, this lack of documentation may weaken CRD's transparency. When an organization is undergoing change, as is the case with CRD and Coast Guard, transparency becomes even more important as it can increase the staff's confidence in the changes.

According to CRD officials, the CRD executive assistant—an integral part of the action plan implementation process—serves at CRD on a rotating basis and will leave the position in June of 2010. Without documentation of the decisions made in the design, implementation, and review of the action plans, the knowledge the official has may leave with him.

Documentation of decisions may also allow CRD to demonstrate to Coast Guard leadership and other stakeholders its progress in addressing long-standing issues identified in the two previous external reviews of CRD. Both the reviews of CRD highlighted issues related to the office's organizational structure, complaint process, and effectiveness, among other issues. Clear documentation is necessary so that the directorate can track progress, make midcourse corrections, and illustrate to stakeholders that it is effectively solving long-standing issues.

The following are examples of the types of records that CRD could have maintained:

- Documentation of the action plan development process and its products, such as minutes from the internal CRD meetings. Minutes from these meetings could have included concerns that were raised, decisions that were made, follow-up issues, and individuals in attendance. Decisions from the Commandant, Leadership Council, and other directorates should also have been documented.

- Documentation of the review process, such as the individuals tasked with reviewing the action plans, dates when completed action plans were approved or denied, and criteria for approving the completion of the action plans.

- Historical record of the weekly status updates of the action plans on the FRR spreadsheet, without which CRD officials may not be able to determine if they are on track to meet their goals or course-correct if necessary. They also cannot use this historical record to fine-tune action planning in the future.

Selected Action Plans Implemented Some Project Planning Practices, but Did Not Fully Implement Other Practices

According to the Project Management Institute, a project plan is used to guide the execution and the internal controls for a project. The plan documents planning assumptions, project decisions, approved scope, cost, and schedules.[15] Among other benefits, this facilitates communication among stakeholders. The following seven practices are adapted from generally accepted project management practices:

1. Identifying measurable performance goals;
2. Defining specific tasks to complete the action plan;
3. Identifying the person(s) accountable for completing the tasks to complete the action plan;
4. Identifying interim milestones/checkpoints to gauge the completion of the action plan;
5. Identifying the needed resources to complete the action plan;
6. Consulting stakeholders; and
7. Defining how to evaluate the success of completing the action plan.[16]

We reviewed the following four action plans that are related to key issues identified in the external review. These action plans encompass 13 of the 53 recommendations that were made to CRD.

- **Complete a New PII Handbook.** This action plan was intended to create a PII handbook. To do so, CRD needed to complete a number of complex tasks including developing Standard Operating Procedures for personal and confidential information, developing a records management system

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[15]Project Management Institute, *A Guide to the Project Management Body of Knowledge,* First Edition (1996).

[16]See appendix IV for a summary of the generally accepted project management practices.

for EEO/EO-related records, instituting a privacy and records management program, and assigning a privacy officer in Coast Guard headquarters.

- **Train Senior Staff to Address Office Climate.** This action plan was intended to improve the interpersonal dynamics of CRD's senior staff. Elements of the action plan included using workshops to help senior staff understand their own and others' underlying interests and concerns, guiding the Director, Deputy Director, and senior staff to pursue more collaborative methods of working with each other, and strengthening leadership effectiveness in group dynamics.

- **Restructure Civil Rights Operations.** This action plan was intended to centralize the management of the EEO/EO services. Formerly, the civil rights service providers who receive EEO/EO complaints were geographically dispersed and reported to their command leader within the geography in which they were located. In the centralized structure, full-time civil rights service providers report to three civil rights regional managers, each responsible for a multistate region. As the regional managers report to CRD rather than Field Commanders, they are in the direct line of command of CRD headquarters.

- **Revise the EO Manual.** This action plan was intended to address the recommendation to revise the manual and add content that addresses the roles of field and headquarters personnel throughout the complaint process and the appropriate statutory references and citations. CRD contracted this undertaking to a third party to complete while providing the oversight intended to achieve a standardized administration of complaints throughout the commands.

Action Plans Only Partially Identified Measurable Performance Goals and Did Not Define How to Evaluate the Success of Completing a Plan

We analyzed the four selected action plans to determine the extent to which generally accepted project management practices have been integrated in their development and implementation process. Table 2 shows the results of our assessment of the extent to which each action plan implemented the practices. For purposes of our analysis, fully means all of the conditions of the project management practices were met, partially means the criteria did not meet all of the conditions of the project management practice, and did not implement means CRD did not provide evidence to meet any of the conditions of the project management practice or the evidence provided was inadequate.

Table 2: GAO Assessment of CRD's Action Plan Alignment with Generally Accepted Project Management Practices

Action taken to address recommendation	Identified measurable performance goals	Defined specific tasks to complete the action plan	Identified the person(s) accountable for executing the tasks to complete the action plan	Identified interim milestones/ checkpoints to gauge the completion of the action plan	Identified the needed resources to complete the action plan	Consulted stakeholders	Defined how to evaluate the success of completing the action plan
Create PII Handbook	Partially	Fully	Fully	Partially	Did not implement	Fully	Did not implement
Training to Address Office Climate	Partially	Did not implement	Fully	Partially	Partially	Did not implement	Did not implement
Restructuring Civil Rights Operations	Partially	Fully	Fully	Partially	Fully	Fully	Did not implement
Revising the EO Manual	Partially	Fully	Fully	Fully	Fully	Partially	Did not implement

Source: GAO analysis of CRD action plans.

Identifying Measurable Performance Goals. All the selected action plans describe an output goal, such as revising the EO manual or attending training, but do not identify measurable objectives or identify the intended results of completing the action plans. In order to fully meet the criteria, CRD needed to define an outcome goal for each of the selected action plans that had measurable objectives against which actual achievements can be compared. For example, conducting training to address office climate is an output goal, but also establishing an outcome goal, such as improving the results of CRD's organizational assessment survey—a measure of personnel attitudes across Coast Guard—would more fully measure the success of the action plan in achieving its intent.

Defined Specific Tasks to Complete the Action Plan. Three of the four action plans defined specific tasks to complete the action plan; however, the action plan related to attending training to address CRD's office climate did not. CRD's senior officials attended six 45-minute training sessions over the course of two months. CRD officials stated that since this action plan was undertaken, a training manager has been appointed to plan longer-term training for CRD.

Identified the Person(s) Accountable for Completing the Action Plan. All four selected action plans fully implemented the project planning

practice of identifying a person or persons accountable for completing the action plan. CRD designated a project officer, or person accountable for the completion of the action plan, at the beginning of the action plan implementation process. Each project officer was responsible for updating the lead project officer on the week's progress, as part of the process CRD had established.

Identified Interim Milestones and Checkpoints to Gauge the Completion of the Action Plan. The contract to revise the EO manual was the only action plan that fully implemented checkpoints and milestones to gauge the completion of the manual. The remaining three action plans, creating the PII handbook, restructuring civil rights operations, and training to address office climate, used their weekly status reporting system to judge process. Establishing milestones for the action plans before or during the planning process would have allowed CRD not only to judge weekly progress, but also to benchmark where weekly progress stood against where they intended. Further, CRD did not keep a record of the weekly status reports or checkpoints; instead, they replaced the prior week's status with the newest status, thus reducing their ability to track the action plans' long-term progress.

Identified the Needed Resources to Complete the Action Plan. The action plan to create a PII handbook was the only plan that did not identify the needed resources to complete the specific action plan. Although CRD officials stated that all of the action plans were reviewed by Coast Guard directorates responsible for Budget, Information Technology, and Infrastructure to determine needed resources, CRD was unable to provide documentation of any of the directorate reviews. Training to address office climate partially implemented this practice. CRD provided documentation of the financial cost of training; however, the documentation did not discuss any other training resources, such as staff time and equipment or training materials. The other two selected action plans, restructuring civil rights operations and revising the EO manual, fully implemented the practice of identifying all of the needed resources to complete action plans. CRD used approved funding and staffing requests to document the identification of resources needed for both of these action plans.

Consulted Stakeholders. For two of the selected action plans, creating the PII handbook and restructuring civil rights operations, CRD provided

documentation demonstrating that they consulted the stakeholders they deemed relevant—civil rights service providers and unions respectively.[17] One of the action plans, related to training to address office climate, did not have any documentation of stakeholder consultation. According to CRD officials, the action plan to revise the EO manual will consult all directorates once it is complete. We assessed this action plan as partially implemented because the end users of the manual were not consulted while the manual was being drafted.

Evaluated the Success of Completing the Action Plan. None of the selected action plans that we reviewed identified how CRD would evaluate the success of completing the action plan. CRD officials stated that they were primarily focused on completing the action plans to address the recommendations to improve the EO/EEO program, and if they had more time, they would have planned to evaluate the action plans. This planning practice—planning to evaluate success—is linked to the earlier planning practice of identifying performance goals. Outcome measures as performance goals, as opposed to output measures, would provide the basis for evaluating the success of the action plans in achieving the intended improvements in CRD. While it is too early to evaluate the effectiveness of the action plans, strategizing about how they would be evaluated is a key step in identifying any necessary midcourse corrections and ensuring that change will go in the right direction.

Conclusions and Observations

Nearly half of the CRD action plans address issues focused on agency leadership. Coast Guard has received recommendations for addressing these issues in previous years but the issues continue to be identified by external reviews as needing improvement. Although the current CRD action plans are intended to address these longstanding issues, effective implementation of the action plans is key to achieving measurable outcomes and making progress to resolve long-standing issues.

CRD established an internal organization and process to address all the recommendations for improvement. When developing and implementing action plans, it is important to incorporate a systematic approach to documenting decisions, outcomes, and actions. Without reliable documentation, CRD cannot demonstrate the clear purpose, planning,

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[17]We did not speak with the civil rights service providers and unions to obtain their views on CRD's consultation.

actions, and outcomes of its efforts. In addition, documentation provides an opportunity for transparency and facilitates the transfer of knowledge when employees leave the office to serve in other roles, which is especially important in military organizations.

Generally accepted project planning practices include identifying measurable objectives and the intended results of completing action plans. Although all of the selected action plans identified output goals, the plans consistently lacked evidence of planning in relation to outcomes. Without measurable performance goals, CRD cannot know if an action plan achieves its intended goals. Additionally, the application of generally accepted project management practices facilitates the evaluation of success and completion of the action plan. By not systematically evaluating success, CRD risks using time and resources ineffectively. More importantly, it also could be more difficult for CRD to know when it has arrived at its overall intended goal—achieving a productive and effective EEO/EO program that will work to ensure a workplace free from discrimination.

Recommendations for Executive Action

We recommend that the Secretary of the Department of Homeland Security direct the Commandant of the Coast Guard to take the following three actions:

- Going forward, ensure internal controls are in place to maintain the documentation necessary to facilitate oversight and course corrections as plans are designed and implemented.
- Establish measurable performance goals for the action plans to support the management decision as to the completion status of the action plans.
- Define an evaluation plan for each action plan to assess the degree to which the plan yielded the intended outcomes.

Agency Comments

We provided a draft of this testimony to the Secretary of the Department of Homeland Security for review and comment. In written comments, which are reprinted in appendix V, the Director of DHS's Departmental GAO/OIG Liaison Office concurred with our recommendations. Coast Guard also provided technical comments, which we incorporated as appropriate.

Mr. Chairman, this concludes my prepared statement. I would be pleased to respond to any questions that you or other Members of the Subcommittee might have.

Contact and Staff Acknowledgments

For further information about this testimony, please contact Laurie E. Ekstrand on (202) 512-6806 or by email esktrandl@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Individuals making key contributions to this testimony included William J. Doherty, Assistant Director, Amber G. Edwards, analyst-in-charge, Karin Fangman, Robert Gebhart, Juliann Gorse, David Maurer, Tamara F. Stenzel, and Gregory Wilmoth.

Appendix I: Third-Party Recommendations to the Coast Guard's Civil Rights Directorate

Recommendation number	Recommendation
1	Equal Opportunity Review—Design and implement metrics to measure process efficiency and for valuing benefits of Equal Opportunity Review process. Develop and implement a mechanism to track and report these metrics against performance targets.
2	Equal Opportunity Manual Revision—To provide specificity regarding the purpose, format, and structure of Equal Opportunity reviews.
3	Training Requirements—Assess Office of Civil Right's current training program and develop a training suite for Civil Rights Service Providers, supervisors, and managers that is tailored to the specific audience.
4	Workload Analysis—Maximize workflow efficiencies and workforce planning by basing staffing decisions and training requirements on valid and reliable data. This would include developing a Work Breakdown Structure (WBS) that delineates the discrete work elements of Office of Civil Rights operations.
5	Conduct a training needs assessment of the U.S. Coast Guard civil rights organization to assess current training programs and knowledge gaps. This assessment should also consider regulatory requirements, business drivers, and the skills and abilities of Civil Rights Service Providers.
6	Use facilitated workshops to help Office of Civil Rights senior staff members to understand their own and other stakeholders' underlying interests and concerns and thereafter to focus on those interests rather than on stated positions and demands.
7	Through coaching sessions, guide the Director, Deputy Director, and senior staff to pursue more collaborative methods of working with each other. This could be accomplished through the strategic planning process and other Office of Civil Rights initiatives such as the Management Directive-715 Report.
8	Conduct a skills inventory of current staff to measure skills versus organizational need, and to identify skill sets required for the job.
9	Conduct a skills assessment to identify core competencies by assessing existing job descriptions and key skills required to support each programmatic function. Refine job vacancy announcements to ensure that candidates have the required skills.
10	Skills Assessment—Determine whether an adequately skilled civil rights workforce is available, trained, and prepared to achieve the Office of Civil Rights and U.S. Coast Guard's civil rights objectives.
11	Develop a Training Course for Equal Opportunity Review team members on various data collection methods and the process of applying statistical techniques to analyze, describe, and evaluate trend data.
12	Ensure that all Civil Rights Service Providers receive training on intake and complaint processing at both the Informal and Formal stages. This would include training designed to ensure that Civil Rights Service Providers understand their role of neutrality throughout the counseling process.
13	Training—Provide Strategic Plans and Resources Management Team Lead with additional training in budget development and justifications.
14	Ensure Office of Civil Rights Budget Personnel undergo training in statutory and regulatory obligations of the office.
15	Assess and take appropriate action regarding Equal Opportunity Review Team participants training needs.
16	Restructure U.S. Coast Guard Civil Rights Operations—This restructuring can be accomplished by placing the Field Civil Rights Service Providers under the direct oversight of the Director of Office of Civil Rights with Area Equal Opportunity Managers reporting to the Director instead of directly to Field Commanders.
17	Convert the Instructional Systems Specialist position currently residing in the Policy and Plans Division to an Operations Manager position reporting to the Deputy. This position would, among other duties, be responsible for operations management and training requirements oversight.

Recommendation number	Recommendation
18	Transition training oversight responsibilities from the Policy and Plans Division to a newly created Operations Manager (reporting to the Deputy) who will manage all aspects of OCR training processes.
19	Create a Senior Advisor Position—This position will provide programmatic guidance to the Director.
20	Designate Privacy and Records Manager—Assign to CG-00H one GS-14 billet.
21	Leverage 0-6 Deputy Responsibility—Responsible for operational and nonstatutory activities including budgeting, resource management, strategic planning, and oversight. Align the Strategic Plans and Resource Management Team and the Policy and Plans Division under the Deputy.
22	Establish a solid-line reporting relationship of field Civil Right Service Providers—have all Civil Rights Service Providers report to the Director.
23	Develop an integrated strategic plan to better enable the organization to execute and deliver on its mission. This strategic plan should incorporate input from key stakeholders, be well communicated to employees, and cascaded across Office of Civil Rights and throughout the Field to ensure consistency of focus across all areas of the U.S. Coast Guard civil rights organization.
24	Move CG-00H-3 Program Analyst billet to CG-00H-2—to assist with Equal Opportunity Reviews.
25	Move Administrative Specialist from CG-00H-2 to CG-00H-4—to assist with administrative functions.
26	Standard Operating Procedures—Develop Standard Operating Procedures for CG-00H-3 to handle all aspects of budget requests for Office of Civil Rights.
27	Revise the Equal Opportunity Manual to include statutory references and citations so that a reader can cross-reference relevant statutory language with the guidance provided. In addition, add content that addresses the roles of Field and Office of Civil Rights personnel throughout the complaint process.
28	Institute a privacy and records management program—based on Department of Homeland Security policies and procedures.
29	Redesign the Equal Opportunity Review process to increase the value and effectiveness of this function.
30	Strategic Planning—Ensure that each division develops a strategic plan that feeds into the Director's overall strategic plan.
31	Develop Standard Operating Procedures for handling Personally Identifiable Information and Confidential information.
32	Develop a records management system that describes, for each type of record, where it should be retained, the various classifications of records, the applicable policies, and how the complaint records should be maintained.
33	Equal Opportunity Manual Revision—Enter detailed Instruction for handling Personally Identifiable Information. Also, revise the Equal Opportunity Manual such that it provides a step-by-step process to determine whether the release of documents is appropriate.
34	Institute a mandatory annual training requirement for supervisors and managers through which participants are taught their responsibilities with respect to Equal Employment Opportunity and affirmative employment. Provide refresher training in a computer-based format that can be used in any location.
35	Develop a business case for Equal Opportunity Reviews. This analysis should consider the specific reasons for an established number of Equal Opportunity Reviews, the rationale for particular site selections, quantifiable measures of success, available dedicated resources, and any other strategic or regulatory drivers that would necessitate Equal Opportunity Reviews.
36	Equal Opportunity Reviews—redesign position requirements for individuals participating in the Equal Opportunity Review process to reflect the specific skills and abilities required to conduct substantive analysis and high-level technical writing.

Recommendation number	Recommendation
37	Revise the U.S. Coast Guard service-specific portion of the Defense Equal Opportunity Management Institute Equal Opportunity Advisors Program to include training by civilian Equal Employment Opportunity Commission certified trainers who would provide instruction in the areas of Equal Employment Opportunity Counseling and complaint processing. This training curriculum would include, among other topics, instruction in basic Equal Employment Opportunity Counseling and other related activities, such as writing reports of counseling, identifying issues, conducting inquiries, and pursuing resolution options.
38	Training Program—Professionalized Equal Employment Opportunity Counseling training program to include mandatory training required by Equal Employment Opportunity Commission, including the eight-hour Refresher and the 32-hour training requirement for new federal Equal Employment Opportunity Counselors. In addition, require counselors to fulfill a bi-annual training requirement by taking an Interviewing Techniques, Conflict Resolution, or Facilitation course.
39	Equal Opportunity Manual—Revise the Equal Opportunity Manual such that it effectively serves as the guiding document for enterprise-wide civil rights operations.
40	Standard Operating Procedures—Develop Comprehensive Standard Operating Procedures to standardize Office of Civil Rights operations. This would include Standard Operating Procedures for each team/division within the Office of Civil Rights and the compilation of an accessible master volume.
41	Perform gap analysis to determine where the current staff meet core competencies and identify where competency gaps exist by comparing the core competencies required to support the Office of Civil Rights roles with the results of the skills inventory of the current staff.
42	Determine whether current program functions are statutorily required or necessary to support the Office of Civil Rights mission and to determine resource needs.
43	Hire or contract for final agency decision (FAD) analysts.
44	Create a Separate spend plan for Training Needs Assessment.
45	Identify "strategic initiatives"—that would be drivers of the Office of Civil Rights strategy as well as that of U.S. Coast Guard. These initiatives should then be prioritized for funding and implementation in any given fiscal year based on their expected impact.
46	Use Office of Civil Rights Strategic Plan to advocate for resource requirements by demonstrating how performance goals align with budget requests.
47	Recruit and hire full-time experienced Equal Employment Opportunity Counselors and Civil Rights Service Providers and discontinue the use of collateral duty staff.
48	Assess CG-00H-4 funding needs.
49	Use the Official U.S. Coast Guard Blog to refute misinformation and protect the credibility of the U.S. Coast Guard workforce.
50	Establish an Official U.S. Coast Guard Blog to convey key message and to minimize confusion and misinformation
51	Disable access to negative unofficial blog sites at U.S. Coast Guard work locations.
52	Strengthen leadership effectiveness in group dynamics and find tools to address effectiveness.
53	Ensure that individuals are held accountable for acts of insubordination.

Source: GAO presentation of Booz Allen Hamilton recommendations to CRD.

Appendix II: Summary of the Equal Employment Opportunity Commission Model Elements

Equal Employment Opportunity Commission model elements	Summary
Demonstrated commitment from agency leadership	Commitment to equal opportunity should be embraced by agency leadership and communicated through the ranks from the top down. Among other things, an agency shall provide sufficient staffing and resources to operate the Equal Employment Opportunity (EEO) program in an effective manner. For example, staff and resources should also be sufficient to enable accurate collection and analysis of data and other employment factors, including applicant information, to enable the efficient identification of barriers. This will necessarily require staff beyond the EEO office, particularly information management/services.
Integration of EEO into the agency's strategic mission	This model element provides that the agency's EEO program should be organized and structured in such a manner as to maintain a work place that is free from discrimination in any of its management policies, practices or procedures and supports the agency's strategic mission. Agency leadership should fully utilize EEO staff as a consultant prior to making decisions which effect workplace opportunities. The EEO Director should be a regular participant in senior staff meetings and regularly consulted on workplace issues and not solely delegated to responding to discrimination complaints.
Management and program accountability	This model element provides that agencies should hire, develop, and retain supervisors and managers who have effective managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications. Also, the agency should meaningfully evaluate managers and supervisors on efforts to ensure equality of opportunity for all employees.
Proactive prevention of unlawful discrimination	This model element provides that as part of its ongoing obligation to prevent discrimination on the bases of race, color, national origin, religion, sex, age, reprisal and disability, and to eliminate barriers that impede free and open competition in the workplace, an agency must conduct a self-assessment on at least an annual basis to monitor progress, identify areas where barriers may operate to exclude certain groups, and develop strategic plans to eliminate identified barriers.
Efficiency	This model element provides that an agency must evaluate its EEO complaint resolution process to ensure it is efficient, fair, and impartial. It also provides that an agency's complaint process must provide for neutral adjudication; consequently, the agency's EEO office must be kept separate from the legal defense arm of the agency (i.e., the Office of General Counsel) or other agency offices having conflicting or competing interests.
Responsiveness and legal compliance	This model element provides that the head of the agency or agency head designee shall certify to the Equal Employment Opportunity Commission (EEOC) that the agency is in full compliance with the EEO laws and EEOC regulations, policy guidance, and other written instructions. It also provides that all agencies shall report their EEO program efforts and accomplishments to the EEOC and respond to EEOC directives and orders, including final orders contained in administrative decisions, in accordance with instructions, time frames, and deadlines.

Source: GAO summary of EEOC's Model Elements.

Appendix III: Excerpt from Coast Guard Civil Rights Directorate Functional Review Recommendation Sheet

Recommendation number	BAH recommendation	Project officer	Most recent action taken	Primary due date	Days before due	Status
16	Restructure U.S. Coast Guard Civil Rights Program – This restructuring can be accomplished by placing the Field Civil Rights Service Providers under the direct oversight of the Director of Office of Civil Rights with Area Equal Opportunity Managers reporting to the Director instead of directly to Field Commanders.	Project officer 1	Restructuring plan has been developed to align with the Coast Guard's proposed Modernization Plan. This plan will include efforts to streamline the Office of Civil Rights (OCR) reporting restructures	4/30/2009	-271	Work in Progress
	Present modernization to Strategic Transformation Team	Project officer 2				Complete
	Present to Commanding Officers	Project officer 1	3/16: Video teleconference scheduled with Commandant and Area Commanders on 3/19		-312	Work in Progress
	Present to Leadership Council	Project officer 1				Complete
	Obtain approval and implement	Project officer 3			-307	Work in Progress

Source: GAO presentation of CRD information.

GAO-10-571T

Project planning practice	Summary
Identifying measurable performance goals	This practice defines the project's goals, describing how they will be achieved and defines measures of performance. The Government Performance Results Act of 1993 (GPRA) defines performance goals and measures with the intention of improving the effectiveness, accountability, and service delivery of federal programs[a] This framework informs federal practice and describes measures as either output or outcome measures. Outcomes describe the intended result of carrying out the activity while outputs describe the level of activity that will be provided over time including the characteristics established as standards for the activity, such as timeliness.
Defining specific tasks to complete the action plan	This practice identifies and documents the specific activities that must be performed in order to complete the project. This aids project completion by facilitating such activities as identifying the resource requirements, developing an appropriate time table for completion, and necessary stakeholder involvement in the project.
Identifying the person(s) accountable for completing the tasks to complete the action plan	This practice identifies and documents who is assigned and responsible for the completion of project tasks. This aids project completion by facilitating internal controls and reporting processes.
Identifying interim milestones/checkpoints to gauge the completion of the action plan	This practice identifies and documents interim milestones and checkpoints to gauge the completion of the project. A milestone is a significant event in the project that marks the completion of a deliverable or phase. A checkpoint is a point at which the status check is performed. This aids project completion by identifying not only the distance the team has traveled toward completing the project, but the direction traveled.
Identifying the needed resources to complete the action plan	This practice identifies and documents the determination of what resources (people, equipment, materials, and money) are needed to complete an action plan. This aids project completion by assuring that resource availability can be assured or alternate plans established to reach the goal of the action plan.
Consulted stakeholders	This practice identifies stakeholders—individuals and organizations that are involved in or may be affected by project activities—and ensures that they are included in developing and executing the project plan allowing them contribute appropriately. This aids project completion by ensuring that employees understand and are committed to the goals.
Defined how to evaluate the success of completing the action plan	This practice establishes and documents quantifiable criteria that must be met for the project to be considered successful. Prior GAO work[b] on designing evaluations discusses the importance of evaluating actions because it is a safeguard against using time and resources ineffectively. Evaluating the success of completing the action plan also increases the likelihood that a person, a team, or an agency will know when an action is complete and one has arrived at the intended goal, which should be attaining the results the action plans were intended to accomplish.

Source: GAO analysis.

[a]Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993).

[b]GAO, Designing Evaluations, GAO/PEMD-10.1.4, (Washington, D.C.: May 1991).

Homeland Security

April 21, 2010

Ms. Laurie Ekstrand
Director, Strategic Issues
Government Accountability Office
Washington, D. C. 20548

Dear Ms. Ekstrand:

Thank you for the opportunity to comment on the draft report GAO-10-571T "Coast Guard: Civil Rights Directorate's Action Plan to Improve Its Operations Could Be Strengthened By Implementing Several Aspects of Project Planning and Implementation Practices."

The Department of Homeland Security and the Coast Guard concurs with the draft report's recommendations and will work to incorporate sound project management principles in future corrective plans. We agree that improved metrics will better enable the program to measure success. The Coast Guard looks forward to continuing to refine its project management efforts to ensure that they meet the requirements of sound project planning and implementation.

The following is our response to the recommendations.

Recommendation #1: Ensure internal controls are in place to maintain the documentation necessary to facilitate oversight and course-correction as plans are designed and implemented.

Response: Concur. To institutionalize the practice, the Coast Guard will imbed internal control functions into staff responsibilities.

Recommendation #2: Establish measurable performance goals for the action plans to support the management decision as to the completion status of the action plans.

Response: Concur. The Coast Guard will develop desired outcomes and measurable success factors, and incorporate them into projects of this magnitude.

Recommendation #3: Define an evaluation plan for each action plan to assess the degree to which the plan yielded the intended outcomes.

Response: Concur. Consistent with recommendation #2, the Directorate will develop a template to incorporate the practice in business processes.

Response: Concur. Consistent with recommendation #2, the Directorate will develop a template to incorporate the practice in business processes.

Thank you for the opportunity to provide comments to the draft report.

Sincerely,
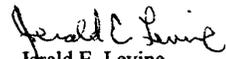
Jerald E. Levine
Director
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