

DOCUMENT RESUME

02251 - [A1392391] (Restricted)

[Survey of Effectiveness and Need for Equal Employment Opportunity Training at Department of Housing and Urban Development, Region IV]. B-70896. April 25, 1977. 6 pp.

Report to Bruce Nestlehutt, Acting Regional Administrator, Department of Housing and Urban Development: Regional IV, Atlanta, GA; by Marvin Colbs, Regional Manager, Field Operations Div.: Regional Office (Atlanta).

Issue Area: Non-Discrimination and Equal Opportunity Programs: Federal Agencies' Achievement of Equal Opportunity and Nondiscrimination Objectives (1010); Personnel Management and Compensation: Training and Education Programs (304).

Contact: Field Operations Div.: Regional Office (Atlanta).

Budget Function: Education, Manpower, and Social Services: Training and Employment (504).

Authority: Equal Employment Opportunity Act of 1972. Executive Order 11478.

A survey of Equal Employment Opportunity (EEO) training provided at Region IV, Department of Housing and Urban Development, focused on kinds of training, selection of participants, and evaluation of results. Findings/Conclusions: Two categories of training were provided: skills and orientation. Skills training was provided for individuals directly involved in EEO programs. Orientation courses, designed to provide knowledge of legal and policy requirements, were provided for managerial and supervisory personnel. Because attendance was based largely on an individual's availability rather than need, very few individuals designated for courses actually attended them. Training needs were not coordinated or monitored at the regional level. As a result, some principals received extensive training while others received none. Some supervisors did not receive EEO training, because it was not included in their supervisory course. Training data was found to be incomplete and inaccurate, and results of training had not been evaluated properly at the time of the GAO study. Some principals traveled to other training centers although courses were available at Atlanta. Recommendations: The regional administrator should: (1) develop procedures to identify training needs, establish an annual schedule, and provide for record maintenance; (2) enforce procedures for record-keeping at local levels; (3) assess training impact; and (4) require use of training courses within the region when feasible. (HTW)

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02251  
B-70296

Mr. Bruce Nestlehutt  
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Dear Mr. Nestlehutt:

We have completed our survey of Equal Employment Opportunity (EEO) training provided in the Department of Housing and Urban Development's Region IV. The survey focused on the kinds of courses offered, selection of participants, and the evaluation of EEO training results.

Although the region was making training available to EEO principals, managers, supervisors and other employees, we believe the program can be strengthened by:

- improving coordination and control of EEO training.
- developing reliable training data, and
- evaluating training results.

We also believe the region should consider the efficiency and economy of providing EEO training within the region--rather than at the Department's training centers in Denver, Colorado and Columbia, Maryland.

BACKGROUND

The need for EEO training is established by the EEO Act of 1972, Executive Order 11470, and the Federal Personnel Manual. The need for training employees--particularly managers, supervisors and individuals directly involved in the EEO program--was also emphasized in Region IV's affirmative action plan.

Two categories of training--skills and orientation--were given.

EEO skills training was designed to improve the skills and knowledge of EEO principals--counselors, Federal Women's Program Coordinators, Spanish Speaking Program Coordinators, discrimination complaint investigators--directly involved in the region's EEO program.

EEO orientation courses were designed to provide knowledge, understanding, and orientation on Federal EEO programs--including laws, regulations, policies, program requirements--to supervisors, managers, and other employees. EEO orientation was usually given as a part of managerial and supervisory courses.

In addition, training in personnel administration is given to EEO principals who have not previously received such training.

COORDINATION AND CONTROL OF EEO TRAINING NEEDS IMPROVEMENT

Individuals designated for training did not always receive training because attendance was based largely on an individual's availability rather than on the need for training. Very few individuals designated for specific courses in the fiscal year 1975 training needs assessment actually attended the courses. This problem was attributed to:

- Aggressive, training-conscious employees who tend to list courses they would like to take without realistically considering the number of training hours they can fit into one fiscal year.
- A tendency to consult training course catalogues before analyzing one's own strengths and weaknesses.
- Supervisors who grant training requested rather than carefully evaluate training needs of the whole work unit.

Supervisors identified employees needing training through an annual training needs survey. In selecting employees, supervisors were instructed to prepare a listing of participants and courses based on both organizational goals and individual needs. These listings were used as the basis for the regional training plan. Supervisors were also requested to release employees from duty to attend the needed training.

Nominations for training are required to be submitted to the regional training officer for review and approval--but this was not always done. Some officers arranged their own training through Civil Service Commission or non-governmental sources and this training was not always reported to the regional training officer for review and approval.

Training EEO principals

The regional EEO officer was responsible for assuring that EEO principals were adequately trained for their duties. However, training needs, approval and attendance were not always reported to or monitored by the EEO officer.

Some principals requested training for themselves; some were nominated by the EEO officer. Because training needs were not coordinated or monitored at the regional level some principals received extensive training in both EEO and personnel administration while others received none.

For example, the personnel files for 15 EEO principals showed:

--five had not received either EEO related training or training in personnel administration, and

--six of the remaining 10 had not received training in personnel administration.

We were told that only two of the principals had not received EEO training and that most EEO principals had received training in personnel administration, but that documentation had not been submitted for inclusion in the personnel file. The regional Spanish-speaking program coordinator told us that two Spanish-speaking program coordinators did not attend any training because one did not believe it was necessary and the other's supervisor would not release him for training.

#### Training supervisors

Some supervisors did not receive EEO training primarily because it was not included in a mandatory 120-hour supervisory course at the time they attended. Regional officials were not certain when the EEO segment was added to this course. They were unable to determine the number of supervisors who had or had not received the EEO segment because (1) records of training were unreliable and (2) many employees became supervisors before the EEO segment was included and may not have received EEO training in other courses. The lack of reliable data is discussed later in this report.

Although some managers and supervisors received EEO training through other courses, there were no controls to insure that all managers and supervisors received at least one course which included a segment on EEO. Selections for these courses were not based on individual need for EEO training and the identity of employees who received training--or those needing it--was not routinely reported.

For the 18-month period included in our survey, records provided by Region IV officials showed that 68 employees received EEO subject matter orientation. The records did not show whether these employees were managers or supervisors.

We interviewed 14 supervisors and managers about their EEO training experience. Seven had never received EEO training and seven had received it during the past 4 years. This problem was recognized in the region's fiscal 1976 affirmative action plan, and action items were included to:

- hold meetings with supervisors, managers and directors to explain and gain support for the EEO program.
- review supervisory training for inclusion of EEO subject matter training, and
- conduct training sessions in each office on the duties and responsibilities of supervisors and managers in the Federal Women's Program.

#### NEED FOR RELIABLE TRAINING DATA

Because reliable training data were not maintained there was no assurance that those who needed training received it. Neither the regional training officer nor the regional EEO officer maintained records identifying training needed or received by EEO principals, managers and supervisors.

We were unsuccessful in obtaining reliable training data from the Department's automated management information system because it was incomplete and inaccurate.

The regional training officer is responsible for administering a coordinated regional training program sharing with line management the responsibility for determining training needs and selecting employees for training. The regional EEO officer is responsible for assuring that EEO principals are adequately trained for their duties.

These officials told us that a major problem in managing EEO training is the lack of reliable training data. The primary reason they cited for unreliable data was that offices do not always coordinate training needs through the regional training office. The region has drafted guidelines instructing offices to notify the regional training office of all locally arranged training activities. At October 21, 1976, these guidelines had not been issued.

#### NEED FOR EVALUATING EEO TRAINING

The region had not properly evaluated the results of EEO training provided to Region IV employees--thus did not know its impact on EEO.

The Federal Personnel Manual makes agency heads responsible for evaluating the results of training programs to determine whether they are contributing effectively to achieving agency missions and attaining management goals. The Manual urges that--at a minimum--evaluations include analyses of

- the extent to which specific training courses or programs produce desired changes in employee knowledge, skills, attitudes, or performance;
- the extent to which the training courses or programs that are provided cover the areas of greatest need; and
- the need for modification in the coverage or conduct of these training courses or programs to meet changing agency needs.

Department instructions require that regional personnel and training organizations identify needs, develop courses and conduct classes. Moreover, they are to evaluate training and participate in Department-wide evaluations. However, only employee self-evaluations--student critiques--were made. The regional training officer said that student critiques were helpful in determining whether students were attentive--increasing the possibility for learning--but they do not provide an objective evaluation of course content or training results.

A Department-wide training evaluation system was implemented during our field-work--but it was too early to assess the system's effectiveness in evaluating EEO training in Region IV.

#### ASSURING EFFICIENT AND ECONOMICAL TRAINING ARRANGEMENTS

We were told that about 85 percent of the region's training is done at the Department's training centers in Columbia, Maryland and Denver, Colorado. We noted five instances where EEO principals attended EEO training at these centers when the training was available within the region. Three principals traveled from Atlanta, Georgia to Columbia, Maryland to attend training on the affirmative action plan and the EEO act. A fourth principal made the trip for training in EEO counseling. Another principal traveled from Columbia, South Carolina to Denver, Colorado for EEO counselor training.

Both courses were available in Atlanta through the Commission's regional training center. There was ample opportunity for EEO principals to participate in the training since the counseling course was offered 17 times during the period surveyed and the course on the affirmative action plan and EEO act was offered five times.

The transportation cost alone for these five principals was about \$680 greater than it would have been for the same courses in Atlanta. Moreover, only one of the employees would have been entitled to per diem or allowances had the training been provided in Atlanta.

### Conclusions and Recommendations

In Region IV, EEO training was made available to EEO principals, managers, supervisors, and other employees. Some offices arranged their own training while others coordinated training through the regional training office. Training was not always reported to the regional training officer for review and approval. Likewise, offices did not always submit records of training for EEO principals through the regional EEO officer. Thus the program lacked coordination and control at the regional level.

Neither the regional training office nor the regional EEO office maintained records identifying training needed or received by EEO principals, managers, and supervisors. Without reliable training data there was no assurance that those who needed training received it.

The results of EEO training provided to Region IV employees had not been properly evaluated therefore, its impact on EEO was unknown.

We recommend that the regional administrator:

- Reevaluate existing procedures for offices within Region IV and develop new procedures as needed to identify persons who should receive EEO training; establish an annual schedule for providing the training; and provide a system for maintaining adequate training records.
- Enforce, at the local levels, systematic procedures which will provide for accurate recording of all necessary training data with copies of records being sent to the regional office for coordination purposes.
- Assess the impact of EEO training on the achievement of agency EEO goals.
- Require the use of EEO training courses available within the region whenever feasible in the interest of efficiency and economy.

We appreciate the cooperation and assistance extended to us by your staff during this survey.

Sincerely yours

MARVIN COLBS

Marvin Colbs  
Regional Manager