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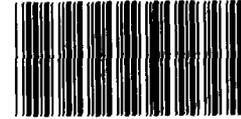
UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

GENERAL GOVERNMENT
DIVISION

B-211721

AUGUST 12, 1983

The Honorable Donald J. Devine
Director, Office of Personnel
Management



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Dear Dr. Devine:

Subject: Classification and Qualification Standards for
the GS-1410 Library-Information Service Series
(GAO/GGD-83-97)

At the request of the Subcommittees on Civil Service, Compensation and Employee Benefits, and Human Resources, House Committee on Post Office and Civil Service, we have reviewed the Office of Personnel Management's (OPM's) development of proposed classification and qualification standards for the Library-Information Service (LIS) occupational series. The objective of our review was to determine whether OPM developed the standards consistently with those of other series and whether OPM acted in accordance with applicable laws, regulations, and policies.

Our review was conducted in accordance with generally accepted government auditing standards. In performing our work from January through June 1983, we:

- Reviewed laws and regulations governing OPM's responsibility and authority regarding standards development and classification.
- Reviewed OPM records pertaining to its policies and procedures for standards development.
- Examined available documentation regarding OPM's occupational studies performed and standards developed for a number of occupational series.
- Interviewed officials of OPM, two of the most affected Federal agencies (Library of Congress and Department of Army), and LIS organizations, as well as LIS personnel.

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We determined that OPM did not exceed its legal authority to develop classification and qualification standards as described in 5 U.S.C. §5105. This law provides that OPM may investigate the duties, responsibilities, and qualification requirements of a series to the extent that it considers necessary to develop standards. We further determined that, although OPM's actions were not always consistent with past practice, they were generally consistent with its actions affecting other recently developed standards. We believe, however, that librarians have raised criticisms that OPM has not fully addressed concerning two major proposed changes--the reduction of entry grade for persons hired with a Master of Library Science (MLS) degree earned in less than 2 full academic years and redefinition of the GS-5 entry level requirements. We also believe that the librarians' concerns about the documentation and sampling aspects of OPM's methodology deserve further consideration. These points are discussed in more detail in enclosure I.

In 1977 and 1978, several agencies and the Federal Library Committee (FLC) perceived substantial changes affecting the occupation, such as the increased importance of information as a resource and management tool and the continuing expansion and rapid change in relevant electronic technology. Consequently, they requested that OPM conduct an occupational study and rewrite the librarian standards. In January 1979, OPM initiated its standards development process by identifying the duties, responsibilities, and qualifications of the librarian series. After completing this effort, OPM issued a draft of the proposed LIS series standards in December 1981. These standards were then revised on the basis of the comments of the librarians and Federal agencies. Although OPM provided additional opportunities for comment on later drafts and made both editorial and substantive changes in response to the comments, affected parties believe further changes to the standards are needed.

An underlying disagreement between OPM and the librarians is whether the female-dominated librarian occupation was treated differently from other series or past librarian standards. Specifically, OPM and the librarians disagree on the proposed (1) reduction of entry grade from GS-9 to GS-7 for those hired with less than a 2-year MLS degree and no experience and (2) redefinition of the minimum entry level at GS-5 with a bachelor's degree or equivalent experience. Also, OPM and the librarians disagree on whether the duties and responsibilities under some job factors are described more stringently than in other series. OPM and the librarians also disagree on the appropriateness of OPM's methodology used in sampling, soliciting and responding to comments, and data gathering.

As stated, we believe OPM did not exceed its broad classification authority in developing the LIS series standards. However, it is not clear that OPM has sufficiently demonstrated that the current minimum qualifications are inappropriate. We recommend that OPM consider determining whether:

--Federal librarians hired at GS-9 with less than a 2-year MLS degree and no experience have typically performed all of the duties and responsibilities of a GS-9 position successfully.

--Federal librarians hired without an MLS degree typically performed all duties and responsibilities successfully and were able to progress through the career ladder. This should give an indication of the possible long term impact of the proposed change.

To further enhance the credibility of its surveys, OPM may wish to research the feasibility of (1) conducting statistically reliable occupational surveys and (2) providing for a documentation process that shows more clearly how conclusions follow from supporting evidence.

At the request of the subcommittees, we have not obtained OPM's official comments on this report.

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As you know, 31 U.S.C. §720 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Director, Office of Management and Budget; the above-mentioned committees; Members of the Congress who have expressed an interest in the LIS series standards; and other interested parties.

Sincerely yours,

W. J. Anderson

William J. Anderson
Director

Enclosures

CHANGE OF ENTRY GRADE FOR AN MLS
DEGREE OF LESS THAN 2 ACADEMIC YEARS

Criteria for awarding master's degrees are set by educational institutions, usually in consultation with or based on requirements of professional accrediting organizations. Degree requirements are usually stated in credit hours or educational units. According to an official of a library school association, MLS degrees typically require about 36 credits, which is generally considered to be a full-time course load for more than 1 but less than 2 academic years.

Under the current librarian qualification standard, and consistent with OPM policy, otherwise qualified applicants who have an MLS degree and no experience can be hired at the GS-9 grade level. OPM has proposed a lower entry grade for persons hired with less than a 2-year MLS degree and no experience. Under the proposed LIS series standard, applicants with less than 2-year MLS degrees and no experience would qualify for a GS-7; applicants with 2-year MLS degrees would continue to qualify for a GS-9. Each school would define the number of credits in its academic year and OPM would use double this amount to establish the minimum for entry at GS-9.

OPM officials said one reason for this change is their belief that individuals delaying Federal employment and continuing in school beyond the bachelor's degree should start at the same grade level as someone who, after receiving a bachelor's degree, accepted a Federal job at the GS-5 grade and received career ladder promotions. OPM also stated that when the policy of allowing GS-9 entry for master's degrees was established, it was based on the general assumption that master's degrees required 2 academic years of study. OPM believes, therefore, that it is appropriate for persons hired with less than a 2-year master's degree to qualify at the GS-7 level. OPM has taken similar action in 8 other series and plans to make this change in 10 other series currently being studied. (See enc. II.)

Many affected Federal agencies and professional associations object to this change, because they believe that all master's programs should be treated equally and that artificial distinctions, such as academic years, should not be made. The librarians point out that many occupations whose standards were not rewritten still allow GS-9 entry for all persons hired with master's degrees and that, until recently, OPM applied its policy on academic degrees consistently for all occupations. In addition, the librarians believe the academic year distinction is unreasonable because a 2-year MLS degree is practically unavailable.

The qualification standard establishes the minimum qualifications needed to predict the potential for successful performance. OPM changed the entry grade for persons with less than a 2-year MLS degrees from a GS-9 to a GS-7, without demonstrating that in the 15-year history of the current standard that these persons have not successfully performed GS-9 level work.

REDEFINITION OF GS-5 ENTRY REQUIREMENTS

In addition to lowering the entry grade for persons hired with an MLS degree requiring less than 2 academic years and no experience, OPM is proposing that persons hired with a bachelor's degree including courses in six subject areas or equivalent experience enter this series at the GS-5 grade. Currently, the most often used entry level for Federal librarians is GS-9 with a requirement for an MLS degree or equivalent experience. (OPM reports that 64 percent of all persons who entered the librarian series from fiscal year 1978 to fiscal year 1982 started at GS-9.) Many professional series define GS-5 trainee entry levels for persons hired with a bachelor's degree or equivalent experience, but 14 of 129 professional series for which OPM writes standards start at higher levels (e.g. speech pathologist).

The librarians believe that entry at GS-5 with a bachelor's degree in library science would be inappropriate for their series because such degrees are not designed to develop professional librarians. ^{1/} The librarians question the long term impact of such a change on the quality of LIS personnel and the resulting quality of service for the public sector. The librarians also fear that this impact will "trickle down" to the non-Federal sector because Federal librarian standards typically become the norm for other sectors.

After comparing course material for undergraduate and graduate study in library science, OPM determined that the undergraduate course material sufficiently qualified entrants to fill trainee LIS series positions at the GS-5 grade. OPM pointed out a number of other factors supporting the change to a GS-5 entry

^{1/}According to the librarians, the bachelor's degree is primarily a degree in elementary or secondary education with a minor in library science. Consequently, librarians believe that holders of such a degree are not fully qualified to perform all the duties and responsibilities of a professional librarian.

level. One factor is that GS-5 is the usual entry level for professional positions. OPM also stated that this change is consistent with its effort to eliminate qualification requirements that could restrict entry into professions and could be challenged in court. OPM believes that a 4-year bachelor's degree which includes library-information science courses in six areas or equivalent experience should be the established minimum unless a need for higher minimum qualifications can be demonstrated. Although OPM does not know the total number of librarians who have entered the series in the past without having an MLS degree, it has identified some who did. For example, 27 of the 210 Federal librarians OPM interviewed entered the series without an MLS degree; most of whom have performed successfully enough to have received 1 or more promotions. OPM acknowledges that the success of those 27 people may not be typical of persons hired in the future without an MLS because (1) some may have been screened using an equivalency test (which is no longer used), (2) some hold other advanced degrees, and (3) others, who may have been unsuccessful, were not considered. Another potential benefit OPM anticipates from the change is that more people who may have the potential to successfully perform the work would be able to qualify for the positions. Agencies would, at their discretion, continue to have the authority to hire employees above the GS-5 level if they have qualifications beyond the bachelor's degree.

We agree that it is OPM's responsibility to set standards which would open competition to all who have the potential to perform the work. However, OPM cannot provide convincing data or examples demonstrating the typical level of success of people who entered the librarian profession without an MLS degree. A qualification standard describes what is required to predict the potential for successful performance, and we believe that assessing the performance of past non-MLS degree personnel could provide a reasonable predictor of how successfully future non-MLS entrants might perform. Furthermore, to the extent OPM can provide an historical perspective on the past success of non-MLS entrants, it would give an indication of the potential long term impact on the quality of LIS personnel and their service to the Government.

LIBRARIANS' CONCERNS OVER
FACTOR LEVEL DEFINITIONS
AND OPM'S STUDY METHODOLOGY

The librarians object to the proposed factor level definitions for the LIS standard because the librarians believe these definitions are more stringent than definitions for comparable levels in other occupations. OPM has described LIS work in

accordance with the nine factors common to all occupations and has defined levels of difficulty for each factor. To assure consistency across all occupations, OPM has established a standard for describing factor levels, referred to as the primary standard. OPM policy calls for developing factor levels, consistent with the primary standard and comparable levels for other occupations. OPM has changed factor level definitions in response to agency comments. OPM believes the proposed factor levels are consistent with the primary standard and factor levels for other occupational series.

We compared the general narrative definitions of the primary standard with the November 1982 LIS series standard and determined that they appeared to be consistent. We did not verify the appropriateness of the illustrations of work situations provided with each factor level description because this would have necessitated replicating a substantial part of OPM's study and comparing subjective judgments and these tasks were beyond the scope of this assignment.

The librarians also criticize how OPM developed the proposed standards. The librarians question whether the sample of libraries and personnel that OPM visited was representative enough to have yielded a comprehensive understanding of the librarians' work. Instead, OPM tries to include positions that encompass the full range of librarian duties and responsibilities. OPM considers the recommendations of agencies in identifying which locations to visit and, as a rule of thumb, considers its investigation complete when new data stop surfacing. OPM relies on its managers and occupational specialists to make this judgment. In addition, OPM uses the comment process to control the quality of its sampling. OPM assumes that problems with the standards, such as inadequate sampling, would become apparent through criticisms included in comments. The comments of the librarians continue to criticize the limited variety of libraries OPM visited; however, the librarians did not provide specific examples of locations where OPM could have observed additional duties and responsibilities of the librarian profession. We did not attempt to prove that the information obtained from OPM's sample was unrepresentative or incomplete because this would have required duplicating part of OPM's study. However, selecting a representative sample might better enable OPM to defend its standards, thereby enhancing the credibility of the study and the resulting standards.

Another concern of the librarians is that OPM did not adequately respond to all of their significant comments on the draft standards. OPM relies heavily on comments as its primary

control mechanism over the quality and appropriateness of the proposed standards. Agency comments on the November 1982 draft standards generally recognized that this version was an improvement over earlier versions, but many agencies continued to express the same primary concerns as the librarians. Although OPM is not required to adopt changes in response to all comments, we believe it has not fully addressed significant criticisms which continue to be made by the librarians and Federal agencies concerning the value of graduate education and minimum entry requirements. In response to comments, OPM has provided rationale for its proposed changes. However, in instances such as these, where past policy is being changed, we believe OPM might increase the credibility of the standards by fully addressing and justifying such changes.

Although OPM has retained volumes of records obtained and created during its development of the LIS standards, we found this documentation difficult to follow. For example, although the standards writers took notes during factfinding interviews, those notes are not always legible, and the files do not summarize data in a way that facilitates verification of OPM's conclusions. In summary, while OPM may have sufficient evidence to support its conclusions, we were unable to confirm the sufficiency of evidence.

Improvements in the representativeness of this sample and documentation of the data gathered may not be practical or yield different results or conclusions. Also, the development of standards is already a difficult and time-consuming task and such improvements may lengthen the survey time. However, more effective sampling techniques and documentation might improve the credibility of the studies and result in time-saving efficiencies and fewer valid criticisms.

OCCUPATIONAL SERIES IN WHICH OPM HAS CHANGED
OR PLANS TO CHANGE THE MAXIMUM ENTRY LEVEL FOR
PERSONS WITH A MASTER'S DEGREE AND NO EXPERIENCE ^{1/}

The proposed LIS qualification standard provides for GS-7 eligibility based on a candidate's completion of 1 year of graduate education in library science, or the completion of all requirements for a master's degree in library science for which at least 1 academic year is required. The proposed LIS standard provides for GS-9 eligibility based on a candidate's completion of 2 years of graduate education in library science or the completion of all requirements for a master's or equivalent degree in library science for which at least 2 academic years of graduate study is required.

A similar pattern for crediting graduate education has been included in the qualification standards already issued for

- Animal Science Series, GS-487;
- Education Program Series, GS-1720;
- Special Education Program Series, GS-1728;
- Education Research Series, GS-1730;
- Education Services Series, GS-1740;
- Instructional Systems Series, GS-1750;
- Quality Assurance Series, GS-1910; and
- Medical Technologist, GS-644.

Draft qualification standards for the following series also use this pattern for crediting graduate education:

- Park Management, GS-025.
- Economist, GS-110.
- Archeology, GS-193.

^{1/}Data provided by OPM.

--Logistics Management, GS-346.

--Pharmacology, GS-405.

--Toxicology, GS-415.

--Contracting, GS-1102.

--Archivist, GS-1420.

--Accounting, GS-510.

--Auditing, GS-511.

According to OPM, 11 of these occupational series are male dominated and 1 is female dominated. OPM does not have data on the male and female populations for six of the series because they are new series.