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*UNITED STATES
GENERAL ACCOUNTING OFFICE*



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Review Of Upward Mobility
Using Job Restructuring
Department Of The Interior

FPCD-76-84

NOV. 3. 1976



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

COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

NOV 1 1976

B-70896

The Honorable
The Secretary of the Interior

Dear Mr. Secretary:

We recently completed a limited review of the Department of the Interior's Upward Mobility program to evaluate the effectiveness of job restructuring in promoting program objectives and to assess program progress. We examined program efforts and the policies, procedures, and guidance issued as well as program evaluation procedures at the Department, nine Bureau headquarters, and two field offices.

Our review of Upward Mobility programs in 1973 and 1974 led to an April 1975 report to the Congress, "Upward Mobility Programs in the Federal Government Should be Made More Effective" (FPCD-75-84). This review included Interior's Upward Mobility program.

In a discussion on May 30, 1974, with Interior officials, we indicated that proposed program guidelines addressed the most important aspects of an effective Upward Mobility program. We stressed, however, that implementation of the guidelines would determine program success.

Interior issued its first departmental guidance on Upward Mobility in November 1974, providing for an Administrative Trainee program and three career education centers in Denver, Colorado; Portland, Oregon; and Washington, D.C. In 1975 Department officials decided not to establish career education centers. Funds requested for the Administrative Trainee program for fiscal year 1975 were not approved at the Department level.

The Department has recognized the need to improve coordination, guidance, and technical assistance to the Bureaus and field offices. Instructions were recently issued providing more specific guidance in planning, developing, implementing, and evaluating Upward Mobility programs.

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Although progress has been made, we believe additional improvements can be made by

- providing better guidance to Bureaus in identifying their Upward Mobility problems as a first step in program planning,
- issuing additional guidance to Bureaus on using skills surveys,
- improving coordination between Equal Employment Opportunity and Upward Mobility program officials in developing affirmative action plans and collecting costs,
- increasing use of job restructuring to support Upward Mobility objectives, and
- reassessing the adequacy of top management support given to the program.

The above matters are discussed separately in detail in the appendixes. We believe adoption of the suggestions would strengthen the program.

Although Department officials generally agreed with these suggestions, they stress need for an adequate resource commitment from the Department before an effective program can be implemented and sustained.

As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written response on actions taken on our recommendations to the House and Senate Committees on Government Operations not later than 60 days after the date of the report and 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.

Copies of this letter are being sent to the Senate Committee on Labor and Public Welfare; the House Committee on Education and Labor, Subcommittee on Equal Opportunities; and the Civil Service Commission.

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We appreciate the cooperation and courtesy extended to us by Department officials during our review. If you wish to discuss the above matters or need further information, please contact Donald G. Goodyear, Assistant Director, Federal Personnel and Compensation Division, on 275-5907.

Sincerely,

Henry Eschwege

Henry Eschwege
Director

NEED TO PERIODICALLY DEFINE
EXTENT OF UPWARD MOBILITY PROBLEM

The Civil Service Commission's (CSC's) Federal Personnel Management Letter 713-27, "Upward Mobility for Lower-Level Employees" of June 28, 1974, provides that most agency programs should focus on providing opportunities for employees below the general schedule (GS) -9 (or equivalent) levels. CSC noted, however, that the Equal Employment Opportunity Act of 1972 does not specify minimum or maximum grade levels for Upward Mobility efforts. Each agency is directed to apply program concepts to develop a variety of opportunities suited to its own organizational and mission requirements.

Our April 1975 report to the Congress stressed the need to identify situations inhibiting Upward Mobility. Management must systematically identify and analyze job patterns preventing advancement of qualified lower level employees. Such occupational analyses should include the

- rate of personnel changes from lower to higher skilled occupations, by grade and job series;
- number of employees in apprentice, technician, and other developmental positions;
- ratio of jobs filled by promotion and reassignment to those filled from outside the agency in apprentice, technician, developmental, or entry level professional positions, by grade level; and
- job series and grade levels in which many employees appear impacted.

These analyses will identify the Upward Mobility target populations and are essential because Upward Mobility needs vary among and within agencies.

Departmental guidance does not direct Bureaus to systematically analyze their work force to identify their Upward Mobility problem. Consequently, target populations were established without determining Upward Mobility inhibitors.

According to personnel officials, Upward Mobility is already taking place throughout the Department. One method of identifying where Upward Mobility may still be inhibited, however, is by analyzing job series and

grade levels where many employees appear impacted. CSC used this method in its recent "Shaft Report" using nonmovement over a 5-year period as an indicator of being impacted.

Our application of this same test to several Bureaus within Interior indicates that Bureaus may have widely differing occupational series and grade levels where Upward Mobility has been inhibited. In 1 Bureau, for example, we identified 737 impacted employees in 29 1-grade interval series GS-4 through 9. Over 50 percent, or 382 of these impacted employees, were at the GS-9 level with 348 concentrated in 2 occupational series. No Bureau program participants have been selected from these two series.

In another Bureau which issued guidelines, but had no significant Upward Mobility program, we identified 2,936 impacted employees in 77 occupational series. Of these 2,936 employees, 2,138 were concentrated in 4 series.

In addition, we identified four Bureaus without formal Upward Mobility programs. Bureau officials said that guidance will soon be issued with their target populations identified according to departmental guidance. Consequently, no systematic occupational analysis will be conducted to determine the extent of their Upward Mobility problem.

This preliminary analysis represents the essential first step of program planning. Additional information on employee desires and skills, as well as the availability of opportunities within the organization, should be considered.

CONCLUSIONS AND RECOMMENDATIONS

There has been no systematic analysis by the Department or Bureaus to determine specifically where lower level employee Upward Mobility has been inhibited. Interior Upward Mobility guidance does not direct the Bureaus to systematically analyze their work force to identify their Upward Mobility problem. It is essential that the Upward Mobility problem be defined before programs are implemented. Otherwise, program efforts may be misdirected.

We recommend that the Secretary of the Interior require program officials to provide more detailed guidance directing Bureaus to identify their need for an Upward Mobility program as a planning process first step. This guidance should include procedures to aid Bureaus in systematically and periodically identifying the extent of Upward Mobility problems.

NEED TO PERFORM SKILLS SURVEYS

Executive Order 11478 of August 8, 1969, states that agencies must use employees' present skills and provide the maximum feasible opportunity to enhance their skills. Chapter 41, title 5, U.S.C. (formerly the Government Employees Training Act) prohibits training employees for a promotional position in a non-Government facility if there is a qualified employee available. As a result, CSC stated in its guidance that agencies must recognize the knowledge, skills, and abilities of their employees. The potentials and suitabilities of these employees must also be considered.

Departmental Upward Mobility guidance dated November 1974 required the Bureaus to conduct annual skills surveys of GS-1 through 8 and wage board employees as part of its Upward Mobility program. We reviewed eight Bureau headquarters to determine if skills surveys were conducted and only one had conducted a skills survey that inventoried employee skills. Although two conducted skills surveys before the November 1974 guidance, neither could provide the survey results and an update was not attempted. Moreover, these two surveys gathered only educational background information without attempting to inventory employee skills.

Officials in one Bureau with a considerable Upward Mobility program said that skills surveys were not conducted because they are not cost-effective and supervisors are aware of employee skills. These officials admitted, however, that (1) a study of skills survey cost-effectiveness had not been attempted and (2) no system exists to confirm that all supervisors periodically collect complete information on all potential job-related skills.

One Bureau and one field office reviewed provided formal training in non-Government facilities as a part of their program. This Bureau and field office have not properly conducted skills surveys and may be violating chapter 41, title 5, U.S.C.

CONCLUSIONS AND RECOMMENDATIONS

Departmental guidance recognizes the need to perform comprehensive annual skills surveys as an integral part of an Upward Mobility program, but the Bureaus have not conducted them. Department and Bureau officials agree there is need for definitive guidance regarding skills surveys.

APPENDIX II

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We recommend that the Secretary of the Interior direct program officials to issue definitive policy, guidance, and procedures on using skills surveys in Upward Mobility programs and require that such surveys be made.

COORDINATION BETWEEN EQUAL EMPLOYMENT OPPORTUNITY
AND UPWARD MOBILITY PROGRAMS
SHOULD BE IMPROVED

CSC guidance requires agency Equal Employment Opportunity (EEO) officials to annually develop an affirmative action plan (AAP), which includes Upward Mobility action items, and to collect EEO and Upward Mobility costs as required by the Office of Management and Budget (OMB) Circular A-11. At Interior, the EEO and Upward Mobility programs are organizationally separate. Annual reports on the Upward Mobility program are made to CSC as required, but responsible program officials (generally located in the personnel office) contribute little or no input to these reports. Consequently, Upward Mobility cost data and affirmative action have been inaccurately reported.

PROBLEMS WITH AAPs

Upward Mobility action items in the AAPs should include (1) identification of problems, (2) descriptions of action items developed to address the problems, (3) designations of responsible officials, and (4) target dates for completing actions. The completion of previously identified action items must also be reported. We analyzed the AAPs of three Bureaus and one field office for fiscal years 1972-76.

Because Upward Mobility program officials did not contribute much to the AAPs, Upward Mobility action items not part of the program were included in the report. In three Bureaus, for example, skills surveys were included as action items in each AAP since fiscal year 1973. Upward Mobility officials from these Bureaus told us, however, that annual skills surveys had not been planned or conducted.

EEO officials in another Bureau were unaware that there was a Bureau Upward Mobility coordinator. Moreover, Upward Mobility officials were unaware that they were responsible for the Upward Mobility action items in the AAP. Both EEO and Upward Mobility officials said there was no Upward Mobility staff contribution to the AAP.

In addition, we found most AAP action items were repeated year after year. Our review of the AAPs showed that, of 180 Upward Mobility action items reported, 137 were repeated in more than one AAP. Most items were continued from year to year, but explanations on progress or lack of progress were not included.

PROBLEMS WITH OMB CIRCULAR A-11
COST DATA

OMB Circular A-11 requires agency EEO officials to annually report to CSC costs for EEO programs including Upward Mobility. The report should include a concise program description, important cost-effectiveness or other analytic findings, pertinent data reliability comments, and planned data collection improvements.

Department officials recognized that the Bureaus experienced problems in reporting Upward Mobility costs, but they had not formally advised CSC of these problems as required by CSC guidance. We reviewed the Department's A-11 submissions to CSC and could not find any Upward Mobility program descriptions or comments on collection problems.

Expenditures reported by Bureau EEO officials appear inaccurate because the officials have not been provided adequate Upward Mobility cost-development guidelines. One Bureau, for example, included a minority recruiting program in Upward Mobility program costs. This program comprised the total Upward Mobility cost reported by the Bureau. Upward Mobility officials said that the minority recruiting program was not an Upward Mobility program and should not have been included. In the Office of the Secretary and five other Bureaus having little or no formal Upward Mobility programs, \$414,900 was reported for Upward Mobility.

Both EEO and Upward Mobility officials agree that increased coordination is necessary. The Department's Upward Mobility coordinator believes, if Upward Mobility program officials had more input, a more meaningful AAP and more accurate cost data could be developed.

CONCLUSIONS AND RECOMMENDATIONS

Noncoordination between EEO and Upward Mobility program personnel throughout the Department has resulted in repeated Upward Mobility action items in AAPs, with little or no implementation, and inaccurate program costs being reported to CSC.

We recommend that the Secretary of the Interior require program officials to:

- Develop procedures insuring accurate collection of OMB Circular A-11 cost data on Upward Mobility.

--Strengthen present reporting procedures to insure that Upward Mobility program staff contribute more to developing Upward Mobility affirmative action items. In addition, the AAP accomplishment section should address reasons for progress or lack of progress on continuing action items.

GREATER JOB RESTRUCTURINGEFFORTS NEEDED

According to CSC, job restructuring is an integral part of an Upward Mobility program. It is a technique to separate clerical and technician duties from professional positions and to establish support positions. Management is permitted to use professionals more effectively and create support positions to provide increased Upward Mobility opportunity for lower level employees. A position can be reclassified downward to the entry level or below, which provides an opportunity for Upward Mobility and also lowers average grade levels.

Job-restructuring efforts have been made, but only one Bureau reviewed had included systematic job-restructuring procedures as an integral part of its program. Guidance at other Bureaus mentions job restructuring as a technique but not as a systematic part of their program.

Two identified inhibitors to effective use of job restructuring are (1) inadequate implementation of position management procedures and (2) program managers' requirements for excessive credentials in major occupational series.

NEED TO IMPROVE POSITION
MANAGEMENT EFFORTS

Before a position is considered for restructuring, management must review the job mix of the organization. Management must maintain and monitor data to analyze the job mix. Ratios on the proportion of laborers and helpers to journeymen and technicians to professionals should be maintained. There should also be a formal justification of how the present job mix was reached. While the Department's position management guidance recognizes the need to perform such evaluations, the Bureaus formally perform them only on a limited basis. Personnel officials said they use their experience and judgment to informally evaluate an organization's job mix.

One result of the limited implementation of the Department's position management program appears to be an increased use of professionals within the Department. To determine the Department's use of professionals to support positions, we developed ratios on the number of professional positions for each support position in seven occupational series. Between 1973 and December 31, 1975, the ratio of professionals to support positions increased in

five of the seven series. There may be valid reasons for the increased use of professional positions, but Bureaus officials were unable to explain these increases with organizational studies. Increased use of professionals inhibit additional Upward Mobility opportunity and may also work against Department position management program objectives.

Officials cited two causes for the lack of Department position management (1) supervisors are inadequately trained in position management and (2) there is no incentive to perform position management because supervisors and managers are not evaluated on such efforts as part of their annual performance evaluations.

After analyzing the job mix, management should determine whether positions could be restructured to provide meaningful Upward Mobility opportunity. Management should also attempt to provide opportunities for internal movement into the major organizational career occupations. While there have been instances in the Department where this has occurred, most restructured positions are staff occupations and not professional career fields which may provide more meaningful and ultimately greater opportunity.

Need for credentials
may be overemphasized

The excessive credentials that management and supervisors require is one main inhibitor to restructuring jobs for Upward Mobility in the major career fields. Personnel officials in several Bureaus said that while limited job restructuring for Upward Mobility has taken place, managers have ignored their recommendations to restructure jobs in major career fields. We were told that managers usually expect to fill positions with persons who have credentials in excess of qualification requirements.

Officials in one Bureau, for example, said the work of the major occupations is very technical and requires persons with advanced degrees. Consequently, restructuring efforts were not made in those technical series. Some officials said managers would probably not consider restructuring technical positions for Upward Mobility because of excessive demand for credentials. According to these officials, managers prefer personnel with post graduate degrees. Our analysis of the educational backgrounds of 3,015 employees in 2 major technical occupations shows

several high-level employees with little or no college education. Consequently, we believe management has an opportunity to restructure some positions for Upward Mobility without adversely affecting the Bureau's mission.

CONCLUSIONS AND RECOMMENDATIONS

Job restructuring is not an integral part of most Bureau Upward Mobility plans. Several personnel officials told us that managers and supervisors have resisted recommendations to restructure jobs in major career fields. They cite (1) lack of supervisory position management training, (2) lack of effective evaluations of supervisory position management performance, and (3) excessive demand or requirement for credentials as job-restructuring inhibitors. Department officials agreed that more emphasis on job restructuring is necessary for an effective program.

We recommend that the Secretary of the Interior require officials to

- develop procedures for systematic use of job restructuring in the Department's Upward Mobility program,
- evaluate supervisors and managers on position management efforts,
- provide additional training for supervisors and managers in job restructuring techniques, and
- encourage the Bureaus to periodically evaluate their organizational structures to attain the optimal job mix for their organizations.

NEED TO REASSESS TOP MANAGEMENTSUPPORT AND COMMITMENT TOUPWARD MOBILITY PROGRAMS

To properly implement and operate a program, top management support and adequate financial and personnel resources must be obtained. According to Department and Bureau officials responsible for implementing the Upward Mobility program, a lack of such support is a major inhibitor to program progress. Officials in five Bureaus having no significant Upward Mobility program said top management did not establish Upward Mobility as a priority item and did not commit sufficient resources for an effective program. Both Department and Bureau Upward Mobility officials indicated they have had difficulties in convincing management of program value.

We recognize that emphasis and resources committed to the Department's Upward Mobility program must be judged in relation to other departmental programs. Nevertheless, many Upward Mobility program officials perceive the present level of top management support as inadequate.

CONCLUSIONS AND RECOMMENDATIONS

Departmental Upward Mobility efforts have suffered because of the lack of top-level management support. Upward Mobility program officials agree that more support will be necessary to sustain an effective program.

We recommend that the Secretary of the Interior reassess the present level of top management support given Upward Mobility to insure that adequate resources are provided within the framework of present Interior Department program priorities.