



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

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FEDERAL PERSONNEL AND  
COMPENSATION DIVISION

JUNE 18, 1979

*[Problems Concerning The Federal*

The Honorable Alan K. Campbell  
Director, Office of  
Personnel Management *PL 96-0925*



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Dear Mr. Campbell:

Inclusion of the Federal Equal Opportunity Recruitment Program (hereafter referred to as the "recruitment program") in the Civil Service Reform Act of 1978 reaffirms a mutual commitment to equal opportunity in Federal service. This program provides government-wide recruiting policies and programs designed to eliminate underrepresentation of minorities and women in civil service employment. (The regulation defines underrepresentation as a situation in which the number of women and members of a minority group within a category of civil service employment constitutes a lower percentage of the total number of employees within the employment category than the percentage women or the minority constitutes within the civilian labor force of the United States (includes all persons 16 years of age and over, except those in the armed forces, who are employed or who are unemployed and seeking work.)) Such a program indicates the intention to act affirmatively toward the objective of achieving equality in representation.

In 1977 we reported that problems in the Federal employee equal employment opportunity program needed to be resolved (FPCD-76-85, September 9, 1977.) We have also reported separately about equal employment opportunity (EEO) problems in the Department of Justice (FPCD-78-79, February 23, 1979). This work, together with current assignments involving special employee advocacy programs and career progression of minorities and women, has caused additional concern about achieving equality in representation.

This letter identifies several problems which, in our opinion, may restrict the ability of agencies to fulfill the requirements of this new program. We are bringing these matters to your attention because of the role

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you have in equal employment opportunity matters. Our main concern is with the need for more specific guidance to agencies in the areas covered in the new program. We believe much of our concern can be addressed in the supplements to the recently issued regulations (5 C.F.R. 720), which became effective April 12, 1979. These problems are discussed in the following sections.

DATA COLLECTION AND REPORTING SYSTEMS ✓  
MUST BE IMPROVED

At the agencies visited, we determined that information is not uniformly available which would provide a basis for measuring and evaluating EEO efforts. While several agencies have a great deal of current information, they have little or no historical data. Others lack complete current information. Some agencies have adequate data bases, but the information is not maintained in a useable form for determining underrepresentation and for tracking career progression. For example, at the Department of State, employee information contained no minority-group designation. To determine the number of minorities in a job series in this agency, a printout containing employees' names and job series would have to be sent to the agency's EEO office, and the EEO staff would add the minority-group designation of each employee. Such an operation is cumbersome and time-consuming. ✓

Statistical data that is available tends to be a profile "snap shot" as of a given date. It does not indicate the personnel actions which have occurred. For example, the regional personnel office in the Department of Labor must request historical work force data from its headquarters office. On the other hand, the Department's national office prepares a quarterly summary of all accessions, promotions, and separations but includes no comparative data for prior periods. As a result of such fragmented information, management cannot fully assess the effect of their decisions on the workforce profile. ✓

INFORMATION GENERATED FOR RECRUITMENT  
PLAN COULD REPLACE INFORMATION CURRENTLY  
CONTAINED IN EEO PLANS

The regulation provides that agencies' recruitment program plans must be included in their EEO plans. "Recruit-

ment" is defined as locating, identifying, and assisting in employing a qualified applicant from either internal or external applicant pools--any listing from which selections are made, including competitive certificates, inventories of qualified candidates, etc. After working with agencies' EEO plans for some time, we believe that they can be greatly improved. For example, the profile data currently contained in EEO plans generally does not provide an accurate basis for assessing workforce changes. Without such information employees' career progression could not be assessed. Rather than enlarging the EEO plan and placing another burden on agencies, the statistics required by the recruitment program regulation could be substituted for the workforce data currently contained in the EEO plan. The new emphasis on the recruiting program as the focus of EEO efforts provides a good opportunity to streamline the reporting requirements. The Equal Employment Opportunity Commission (EEOC) should also consider other methods of consolidating and simplifying plans and reports. ✓ 00440 All EEO plans

✓ EEO Management Bulletin No. 701 indicates that EEOC contemplates changing the format of the annual EEO plan, calling for a results-oriented, multi-year EEO plan. We strongly support this initiative but believe it should be more definitive. EEO plans should contain analyses of the statistics, showing at the least, the percentages of increases and decreases in the profiles. Further, timetables should be developed for implementing this change. " "

RESPONSIBILITY AND ACCOUNTABILITY ✓  
NEED TO BE PINPOINTED

The regulation provides that the head of each agency must specifically assign responsibility for program implementation to an appropriate agency official. The supplements to the regulation should specifically state that authority is commensurate with assigned responsibilities, and that responsibilities are clearly stated, so that accountability may be pinpointed. OPM should also specifically state what its own responsibilities and accountability will be for program implementation, as distinguished from those of EEOC and the agencies. )

ITEMS NOT INCLUDED IN  
THE REGULATIONS

OPM's regulation does not describe any specific

mechanism for evaluating the effectiveness of the recruitment program. Such an evaluation mechanism is essential, particularly with a new program, to pinpoint problems and to allow EEOC and OPM to take action to correct the problems noted. We recognize that OPM is working on a proposed model to evaluate civil service reform, and that contained in this draft is a proposed evaluation plan for the recruitment program, but this evaluation model should be outlined in the supplements, so that agencies will be informed on the method of evaluation. Moreover, this model must explain the objectives of the recruiting program in some detail to guide agencies in their efforts and permit a meaningful evaluation. ✓

To reach full representation in agencies, an effective method for identifying members of minority groups will have to be devised. It has been proposed that employees be asked to identify themselves as being in a particular minority group. Agencies now rely on visual identification. The latter method is not fully effective, because the decision is based upon a guess. The former method would be a useful complement to the latter, if all employees are asked to identify their race, sex, and ethnicity. )

The regulation does not specify any goals for the recruiting program except the very general goal of eliminating underrepresentation, which has not been defined with realistic parameters. Without more specification and well-defined timetables, this goal is grandiose and may be rejected by agency management as unrealistic. We believe that short-term and mid-range goals, with specific timetables, are necessary for management to plan resource allocations and relate them to prospective accomplishments. )

Likewise, the FPM Supplement should include a specific definition of measurable progress toward representation. In specifying measurable progress, we believe that OPM must consider the issues of reasonable effort and labor market availability of qualified candidates. We also think some attention should be given to uniformity in the determination of civilian labor force baselines and in the occupational and grade groupings which will be used in determining underrepresentation. A provision for uniformity is necessary to allow agencies to plan and carry out the program and to avoid arbitrary distinctions. ✓

Thus, in a variety of areas the guidance issued to agencies in the Federal Personnel Management Supplements should be specific. Otherwise, we believe that the opportunity exists for agencies to merely describe their current EEO efforts in new language. This will not achieve the intended purpose of the recruitment program. The supplementary instructions should attempt to assure that new activities will be undertaken.

In implementing the recruitment program regulation, EEOC and OPM will also have to consider pertinent laws, existing merit promotion plans, and union agreements which have been established in agencies. Such existing agreements may be binding on the agencies and may affect attempts to reach full representation. We believe that EEOC and OPM should assess the impact of these factors on the recruitment program.

We have discussed this letter with officials from OPM and EEOC and have considered their informal comments when preparing it for issue.

This letter is also being sent today to EEOC. We are also sending copies of this letter to the Office of Management and Budget, the House Committee on Post Office and Civil Service, the Senate Committee on Governmental Affairs, and the House and Senate Committee on Appropriations.

We should appreciate receiving any comments you may have on this letter.

Sincerely yours,



H. L. Krieger  
Director