

GAO

Report to the Ranking Minority Member,
Committee on Governmental Affairs,
U.S. Senate

September 1995

EQUAL EMPLOYMENT OPPORTUNITY

Women and Minority
Representation at Interior,
Agriculture, Navy, and
State





United States
General Accounting Office
Washington, D.C. 20548

General Government Division

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September 29, 1995

The Honorable John Glenn
Ranking Minority Member
Committee on Governmental Affairs
United States Senate

Dear Mr. Glenn:

This report responds to your request that we examine the representation of women and minorities at the Departments of the Interior, Agriculture, Navy, and State and major factors affecting their representation. It is one in a series of reports that we have prepared on the federal affirmative employment program in response to your request.

We are sending copies of this report to other appropriate congressional committees and executive branch agencies, including the Secretaries of the Interior, Agriculture, Navy, and State; the Chairman, Equal Employment Opportunity Commission; and the Director, Office of Personnel Management. We will also make copies available to others on request.

Please contact me on (202) 512-3511 if you have any questions concerning this report. The major contributors to this report are listed in appendix VII.

Sincerely yours,

A handwritten signature in black ink, which appears to read "Timothy P. Bowling". The signature is stylized with a large, looping "T" and "B".

Timothy P. Bowling
Associate Director
Federal Management and Workforce
Issues

Executive Summary

Purpose

The former Chairman of the Senate Committee on Governmental Affairs, concerned that underrepresentation of equal employment opportunity (EEO) groups in the federal workforce continued more than 10 years after legislation to eliminate it was passed, asked GAO to determine: (1) the representation of women and minorities at the Departments of the Interior, Agriculture, Navy, and State; (2) these agencies' compliance with the Equal Employment Opportunity Commission's (EEOC) affirmative employment planning instructions, particularly those that address factors affecting women and minority underrepresentation; and (3) the extent of EEOC and Office of Personnel Management (OPM) oversight of agencies' affirmative employment and recruitment programs.

Background

Federal agencies are required by law to (1) implement affirmative employment program plans to eliminate underrepresentation of women and minorities where it exists and (2) conduct affirmative recruitment for underrepresented occupations and pay grades. Affirmative employment program plans are defined by EEOC to include comprehensive workforce analysis by occupational categories, grade groupings, and key jobs that can lead to middle and senior-level positions; identification of barriers to the employment of women and minorities; and development of action plans for eliminating the barriers. Affirmative recruitment, according to regulation, means the total process by which agencies locate, identify, and assist in the employment of qualified applicants from underrepresented groups in categories of employment where underrepresentation has been determined. The law defines underrepresentation to mean a situation in which the percentage of an EEO group within a category of civil service employment is less than its equivalent percentage within the nation's civilian labor force (CLF).

EEOC and OPM have significant roles in the government's efforts to eliminate underrepresentation. EEOC's role is broader in scope than OPM's. EEOC has statutory authority for providing federal agencies instructions on developing their affirmative employment plans, reviewing and approving those plans, and evaluating program implementation. EEOC's Management Directive (MD) 714 sets forth the instructions which agencies must follow in order to have their affirmative employment plans approved by EEOC. One element of those plans has been affirmative recruitment. OPM is required by law to assist agencies with their affirmative recruitment programs and evaluate the effectiveness of those programs.

GAO made various analyses of the four agencies' workforces, compared the four agencies' affirmative employment and recruitment efforts and plans for the second and current multiyear affirmative employment planning cycle with relevant instructions, and interviewed OPM and EEOC officials to discuss their approach to monitoring and evaluating agency programs. In addition to comparisons to the CLF, GAO compared the numbers of women and minorities to the numbers of white men in each of the four agencies. White men were used because they were the predominant group at the four agencies. The term "relative number" refers to the number of women and minorities for every 100 white men. For comparisons over time, GAO used data for fiscal years 1984 and 1992, the most recent for which it had complete data available. GAO analyzed EEO representation in 49 key jobs—nonclerical occupations that are or can lead to middle and senior-level positions. These key jobs were among those that the agencies had identified in their affirmative employment plans, as EEOC instructions provide.

In February 1995, both Congress and the administration announced that federal affirmative action programs should be reexamined because some may no longer be serving their original purpose. This report is based on the programs in place up until that time.

Results in Brief

The Departments of the Interior, Agriculture, Navy, and State have made progress in improving women and minority representation in their workforces. In general, the relative numbers of women and minorities in each agency increased between 1984 and 1992.¹ As of September 1992, however, certain EEO groups were still underrepresented on an overall basis and often underrepresented to a greater degree in key jobs when compared to the CLF. In addition, while the relative numbers of women and minorities in key jobs increased across all white-collar grades and management levels, as of 1992 these groups continued to be less well represented in the higher grades of the agencies' organizations.

Furthermore, the four agencies' multiyear affirmative employment planning program analyses did not completely address each of the eight required program elements set forth by EEOC in MD-714. For example, none of the four completely analyzed its recruitment and hiring, promotions, or separations program elements, all of which are needed to identify the fundamental causes of underrepresentation.

¹Workforce numbers for each EEO group are included in appendixes I and II. The term EEO group as used in this report refers to women and minority EEO groups unless otherwise indicated.

Finally, neither OPM nor EEOC provided the oversight necessary to ensure that agencies' affirmative employment programs can effectively correct imbalances in their workforces. For example, OPM did not apply all the elements set forth in its regulations (5 CFR 720.205) when reviewing agency affirmative recruitment plans, and until recently, the number of EEOC's on-site reviews was limited.

Principal Findings

Progress in Improving the Representation of Women and Minorities Has Been Made

Women and minorities at the four agencies GAO reviewed have made progress in their relative levels of representation. Relative to white men, all of the groups of minority men and women GAO looked at, except for black men at Navy and Hispanic men at State, were better represented among the agencies' total workforces in 1992 than they were in 1984. The number of white women, relative to white men, increased by percentages ranging from 13 percent to 41 percent across the four agencies. Minority men and women showed similar increases in number relative to white men, with percentage increases ranging from 6 percent to 78 percent across the four agencies.

Despite the gains in relative numbers, women and minorities were represented in lower relative numbers in the agencies' key job workforces and in the State Department's Foreign Service workforce than in the agencies' total workforces. This condition was more pronounced for white and minority women than for minority men. In addition, women and minorities were underrepresented in fiscal year 1992 at the four agencies when compared to the CLF, in both the total and white-collar workforces. Minority men were underrepresented in the total workforces at Agriculture and State, minority women in the total workforces at Agriculture and Navy. White women were underrepresented in the total and white-collar workforces of all four agencies; minority women were underrepresented in the total workforces at Agriculture and Navy and also in Agriculture's white-collar workforce. Women and minorities were underrepresented in many of the key jobs that GAO reviewed at each of the four agencies. The specific EEO groups that were underrepresented when compared to the CLF varied by agency. For example, Hispanics were underrepresented in key jobs across all agencies; Asians in key jobs in all agencies except the Navy.

The relative numbers of women and minorities in key jobs or in State's Foreign Service jobs increased across all grade levels (i.e., 1 through 15) between 1984 and 1992. Women and minorities also made strides in the Senior Executive Service (SES) ranks and in State's Foreign Service top positions over this period. Their percentage of these top positions grew from almost 9 percent in 1984 to nearly 16 percent in 1992. Nonetheless, as of 1992, the presence of women and minorities in General Schedule grades 13 through 15 was still relatively low. (There were 14 or fewer white women, minority men, and minority women at grades 13 through 15 per 100 white men at the same grade levels at Interior, Agriculture, and Navy; 22 or fewer at State). Further, white men still dominated the higher ranks of the agencies, accounting for 75 percent or more of the agencies' senior positions (i.e., SES as well as State Department's Senior Foreign Service and Chiefs of Mission).

Generally, women and minorities were hired and promoted into agency key jobs (or, at State, the Foreign Service jobs) in relative numbers that exceeded the relative numbers in which they were employed in both 1984 and 1992. However, in all four agencies, various EEO groups separated from the agencies at rates that exceeded their employment rates in 1992. This higher rate of separations limited the agencies' overall progress in achieving a representative workforce.

Agencies' EEO/Affirmative Employment Planning Program Analyses Did Not Completely Address All Elements of EEOC Directive

GAO used EEOC's MD-714 as criteria for evaluation of agency multiyear affirmative employment planning analyses and plans because it was the governmentwide instruction in effect at the time of GAO's review. MD-714 states that agencies should use each of eight stated program elements in conducting their analyses, but need not use all of the program elements in developing their plans. Each of the four agencies GAO reviewed lacked a complete affirmative employment planning analysis for four of the eight program elements (recruitment and hiring, promotions, separations, and program evaluation). The only program element that all four agencies fully analyzed was handling of discrimination complaints.

According to EEO and/or personnel officials at the agencies reviewed, EEOC's directive was not completely followed due to a number of factors: (1) the agencies considered EEOC's affirmative employment program planning instructions as guidelines rather than requirements; (2) agencies lacked data on personnel events—recruitment, hires, training, promotions, and separations—needed to analyze problems and barriers; (3) senior managers had little involvement in preparing the plans; (4) the agencies

treated the affirmative employment plans as a “paperwork requirement” rather than as action plans to be taken seriously; and (5) EEOC approved multiyear plans when agencies did not follow all instructions.

In addition, agencies face practical difficulties in collecting certain data. For example, agencies have not had a governmentwide means for gathering agencywide applicant flow data since OPM’s authorization to use a specific form expired in December 1983. Applicant flow data—which identify the gender, race, and ethnic origin of job applicants—are needed to determine whether recruiting efforts are generating sufficient numbers of women and minority applicants.

In 1991, GAO recommended that OPM, in coordination with EEOC, examine options for collecting and analyzing applicant flow data and take prompt action. As of June 1995, OPM said it was opposed to collecting these data. The agency stated that collecting applicant flow data is costly, ineffective, and a reporting burden. OPM believed that agencies should be held accountable for the compositions of their selections. In contrast, in July 1995, EEOC said that knowledge about the applicant pool is necessary to hold agency officials accountable. EEOC also said that collection of applicant flow data is required by regulation that is binding on both public and private sector employers.

Although not required by EEOC, three of the four agencies reviewed established numerical goals in their multiyear affirmative employment plans as a means of achieving full representation. However, they did not link the goals to specific underrepresentation problems as EEOC instructions provide when goals are established.

While agency heads are ultimately responsible for implementing programs to correct the underrepresentation of women and minorities in the federal workforce, no formal mechanisms are in place to hold them accountable for the success of their agencies’ EEO/affirmative employment programs. The National Performance Review recommended that the President mandate through Executive Order that each agency head build EEO/affirmative employment elements into “the agency’s strategic business plan and include effective measurements for impact and change.” However, agencies may or may not have formal strategic plans. As of April 1995, a draft of the Executive Order was still under review. Moreover, while the Government Performance and Results Act of 1993 requires agencies to develop strategic plans containing organizational goals and objectives and measurable outputs, these requirements do not

go into effect until 1997. It is unknown how the current reexamination of federal affirmative action programs will affect the administration's plans for holding agency heads accountable for results in EEO/affirmative employment programs.

OPM and EEOC Oversight of Agencies' Affirmative Recruitment and Employment Programs

While OPM reviews agencies' recruitment program plans, its reviews of the four agencies' plans did not include all of the elements covered in its own regulations. Officials in OPM's former Office of Affirmative Recruiting (now the Office of Diversity) acknowledged that OPM does not follow all of the requirements set forth in applicable regulations (5 CFR 720.205) when reviewing recruitment program plans. While OPM increased the number of its on-site program evaluations from 5 per year over fiscal years 1989-1992 to 27 in 1993, these evaluations did not provide agencies with information on the effectiveness of their affirmative recruitment efforts. OPM officials stressed that EEOC bears the primary responsibility for oversight of federal agencies' affirmative recruitment and employment activities.

As of June 1995, EEOC had completed 50 on-site reviews of agencies' affirmative employment programs for the multiyear planning cycle that began in 1988. Thirty-six of these reviews have been completed since June 1993, when EEOC officials told us they were revising their evaluation approach to enable them to do more reviews in a given year. EEOC's on-site reviews have addressed significant program issues. For example, EEOC's report on Navy's program offered specific recommendations regarding Navy's need to address underrepresentation of women and minorities in SES positions and upper grade levels and evaluate its Merit Promotion Program for adverse impact on EEO groups. Navy agreed to implement all of EEOC's recommendations (see Ch. 4).

Recommendations

GAO is making no recommendations in this report.

Agency Comments and GAO'S Evaluation

GAO requested comments on a draft of this report from the Secretaries of Agriculture, Interior, Navy, and State; the Director, OPM; and the Chairman, EEOC. Written comments were received from the Department of Defense, Interior, OPM, and EEOC. GAO met with State's EEO Director and with a personnel management specialist from Agriculture's Office of Personnel, in July 1995, to obtain their oral comments. Overall, with the exception noted below, the agencies concurred with GAO's observations and analyses,

and provided some suggestions for improving the clarity and accuracy of GAO's analyses, which GAO incorporated where appropriate.

In its comments, EEOC articulated an interpretation of MD-714's reporting requirements that was different from the one EEOC officials had provided GAO during the course of past reviews. EEOC said that its current interpretation of MD-714 provides agencies leeway in determining which program elements to report in their plans and that, given this interpretation, the plans that GAO had characterized in its draft report as incomplete could instead be viewed as complete. GAO agreed and has revised the report to reflect EEOC's most current interpretation. In doing so, however, GAO also further clarified its point that MD-714 requires agencies to perform analyses to identify underrepresentation and barriers to achieving full representation and that these analyses had not been done or were incomplete at all four of the agencies reviewed.

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Abbreviations

ACE	Office of Agency Compliance and Evaluation
CLF	civilian labor force
CFR	Code of Federal Regulations
COM	Chief of Mission
CPDF	Central Personnel Data File
CSRA	Civil Service Reform Act
DOD	Department of Defense
EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
FEORP	Federal Equal Opportunity Recruitment Program
FPM	Federal Personnel Manual
FS	Foreign service
FY	fiscal year
GSA	General Services Administration
GS	General Schedule
GPRA	Government Performance and Results Act
HUD	Department of Housing and Urban Development
MD	Management Directive
NPR	National Performance Review
OPM	Office of Personnel Management
OMB	Office of Management and Budget
PATCOB	professional, administrative, technical, other, and blue collar
SBA	Small Business Administration
SES	Senior Executive Service
SFS	Senior Foreign Service
VA	Department of Veterans Affairs

Introduction

The federal government has been grappling with equal employment opportunity issues for over 3 decades. A number of laws and executive orders have been promulgated to end discrimination and promote affirmative employment within the federal government. The initial focus of the legislation was on ensuring fair employment practices and nondiscrimination. The attention to affirmative action as a means of addressing the historical underrepresentation of women and minorities in the federal workforce began in the 1960s.

Two major pieces of legislation, the Equal Employment Opportunity Act of 1972 and the Civil Service Reform Act of 1978, provide the statutory basis for the establishment of affirmative employment and recruitment programs in the federal government. The Equal Employment Opportunity Commission (EEOC) has primary responsibility for providing federal agencies with guidance on their affirmative action programs and for monitoring and evaluating program implementation. Although affirmative action programs are currently the subject of some review and debate, these laws and programs remain in effect and guided the actions of the agencies we reviewed.

The 1972 and 1978 Acts Provide a Statutory Basis for Taking Affirmative Action

The Equal Employment Opportunity Act of 1972 amended title VII of the Civil Rights Act of 1964 to cover federal employees. The 1972 Act requires that all personnel actions affecting federal employees or applicants for employment be free from discrimination. It also requires federal agencies to develop and implement affirmative employment program plans to eliminate the historic underrepresentation of women and minorities in the federal workforce. The 1972 Act made the then Civil Service Commission responsible for enforcing those requirements and for approving agencies' plans. These responsibilities were later shifted to EEOC.

The Civil Service Reform Act (CSRA) of 1978 stated for the first time in law that a basic federal personnel policy is to create a competent, honest, and productive federal workforce that is reflective of the nation's diverse population. The act also required OPM to implement a minority recruitment program. Accordingly, OPM set up the Federal Equal Opportunity Recruitment Program (FEORP), which requires agencies to conduct affirmative recruitment for occupations and grades in which equal employment opportunity (EEO) groups are underrepresented. Under the act, the Office of Personnel Management (OPM) is responsible for assisting agencies in their affirmative recruitment efforts, overseeing FEORP, and reporting annually to Congress on FEORP implementation activities.

CSRA defines underrepresentation as a situation in which the percentage of an EEO group within a category of civil service employment is less than its equivalent percentage within the CLF, as determined under the most recent decennial or mid-decade census or current population survey taken under title 13 of the United States Code.¹ The CLF represents all persons who are employed or seeking employment.

OPM and EEOC are responsible for providing oversight to executive agencies' affirmative recruitment and employment programs, respectively. OPM and EEOC manage their oversight responsibilities primarily through reviews of workforce data, agency affirmative recruitment and employment plans, and accomplishment reports. They also do periodic on-site program reviews. OPM and EEOC are required to report annually to the President and Congress on the agencies' affirmative recruitment and employment activities.

EEOC's Affirmative Employment Program Planning Process

Executive Order 12067 implemented the President's Reorganization Plan No. 1 of 1978, which transferred the equal employment opportunity functions in the federal government from the Civil Service Commission to EEOC. The executive order assigned EEOC lead coordinating and oversight responsibilities for federal equal opportunity programs and activities. These responsibilities include establishing rules, regulations, orders, and instructions for developing and implementing affirmative employment program plans required by law. In addition, under Title VII of the Civil Rights Act of 1964, as amended, EEOC is required to report to the President and Congress on the federal affirmative employment program for women and minorities. Responsibilities for overseeing federal affirmative recruitment programs remained with OPM.

EEOC established a multiyear planning process, which requires agencies to prepare 5-year affirmative employment plans and annual updates for EEOC's approval. EEOC also requires agencies to report annually on their accomplishments.

EEOC is responsible for the review and approval of agencies' plans. As part of this authority, EEOC issues a Management Directive to provide federal agencies guidance on the development and submission of their

¹The Bureau of Labor Statistics publishes current population data, which are based on monthly household surveys. However, these surveys do not include enough households to provide a statistically sound representation of all minority groups. Consequently, the population survey may not report on minority groups that have small numbers. Taking into account this limitation, we used 1990 census data in analyzing the agencies' workforces.

EEO/affirmative employment plans. Although the Directive does not have the force of official regulation, it sets forth the procedures which it says agencies must follow in order to have their plans approved by EEOC.

In 1981, EEOC issued Management Directive (MD) 707, the first set of instructions for preparing multiyear and annual affirmative employment plans for minorities and women. These instructions originally covered fiscal years 1982 through 1986, but were extended to fiscal year 1987. MD-707 provided that agencies should set numerical goals where underrepresentation of women and minorities was found. This directive established the term “severe underrepresentation” to describe situations in which an EEO group’s representation in an agency is less than 50 percent of the CLF rate.²

In 1987, EEOC issued MD-714, which provides instructions for the second and current multiyear affirmative action planning cycle. EEOC’s policy intent in issuing MD-714 was to create stronger and more effective affirmative employment programs through a process that provided for

- a systematic analysis of program elements, including workforce analysis by occupational categories, grade grouping, and key jobs that can lead to middle and senior-level positions;
- identification and removal of barriers;
- identification of objectives and actions that lead to positive meaningful results;
- strong agency head commitment;
- management accountability systems for holding senior managers responsible for achieving agency EEO objectives; and
- reporting mechanisms to monitor changes in the agencies’ workforces and progress in resolving problems.

As shown in figure 1, MD-714 provided that agencies should (1) analyze eight program elements, (2) identify barriers to the employment of women and minorities, and (3) develop action plans for eliminating the barriers. As in previous EEOC instructions, MD-714 indicated that each agency should compare the EEO composition of its workforce with that of the CLF and to include this analysis in its affirmative employment plan. The establishment

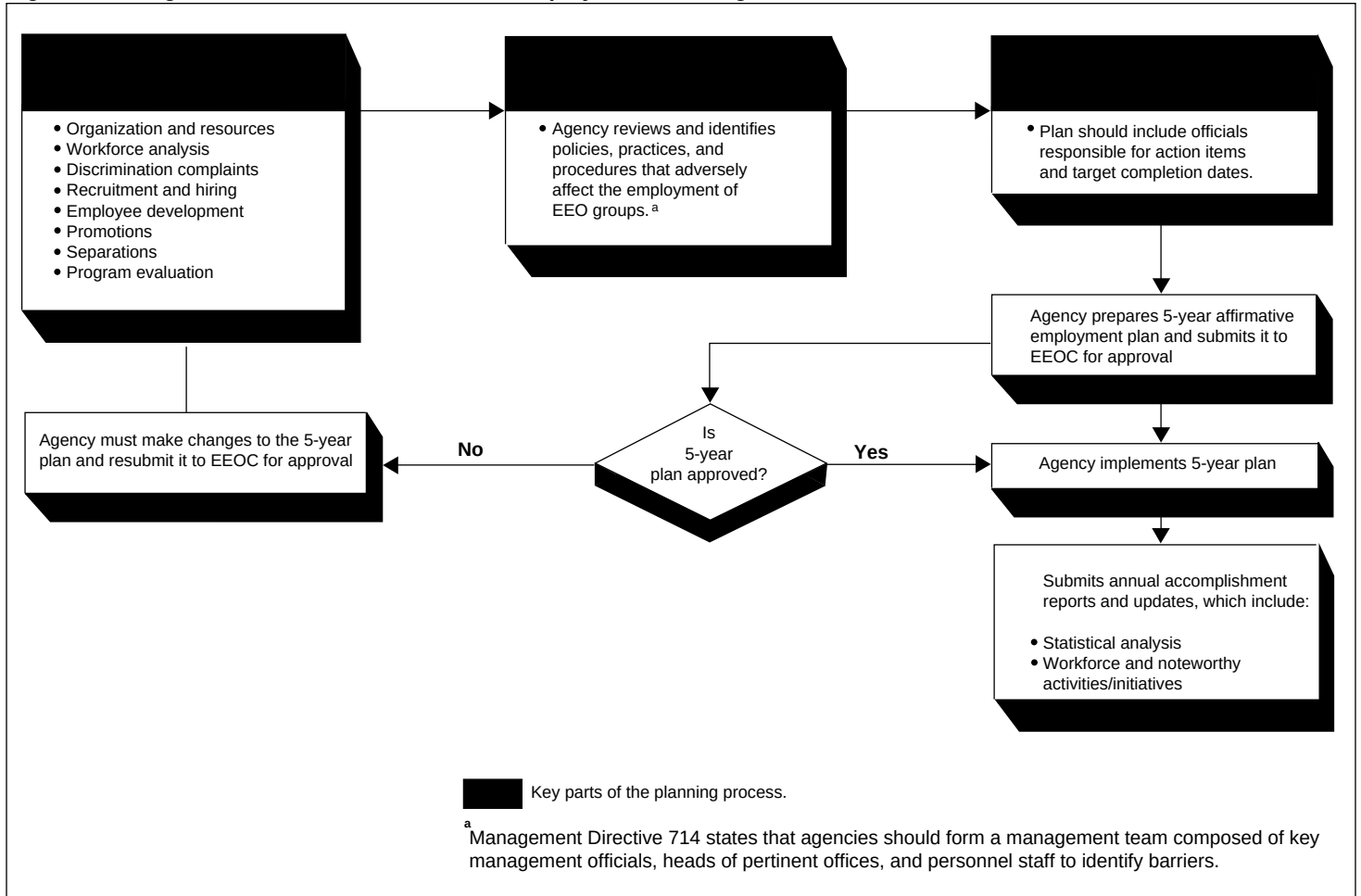
²As previously said, CSRA defined the term underrepresentation. EEOC is no longer using the terms “underrepresentation” and “severe underrepresentation.” We use them in this report because we find them better defined than EEOC’s substitutes. Beginning in 1988, EEOC used “manifest imbalance” to refer to situations where an EEO group was substantially below its representation in the CLF. It also used the term “conspicuous absence” for situations where an EEO group was nearly or totally nonexistent in the workforce. However, currently EEOC uses no numerical criteria for these terms or for measuring the extent of underrepresentation.

of numerical goals is discretionary under this directive. According to EEOC guidance, the major thrust of MD-714 was to get the agencies to identify and remove barriers to the employment and advancement of women and minorities.

Under MD-714, agency heads are responsible for ensuring compliance with affirmative employment program instructions issued by EEOC, establishing agencywide goals and objectives, and ensuring that all Senior Executive Service (SES) members are held accountable for achieving affirmative employment objectives as required under CSRA.

MD-714 was intended to cover fiscal years 1988 through 1992. It too was extended until a new directive is issued. In 1994, EEOC drafted a new directive to replace MD-714. EEOC officials have told us that the draft is being reviewed by the Commission.

Figure 1: Management Directive 714 Affirmative Employment Planning Process and Instructions



Source: EEOC's Management Directive 714.

Objectives, Scope, and Methodology

This report is one in a series that we have prepared on the federal affirmative employment program for the former Chairman of the Senate Committee on Governmental Affairs. In May and October 1991, we reported on the federal affirmative employment planning guidance and the representation of women and minorities in the federal workforce.³ In March 1993 and July 1994, respectively, we reported on the progress of EEO groups in the key job workforces of large and small federal agencies.⁴

As agreed with the Committee, the objectives of this study were to

- determine the representation of women and minorities at the Departments of the Interior, Agriculture, Navy, and State and changes in the representation levels of these groups, particularly at the upper grade levels and in occupations that lead to those grades;
- evaluate whether the agencies' affirmative employment program plans complied with EEOC's instructions, particularly those that address factors affecting women and minority underrepresentation; and
- assess the adequacy of EEOC's and OPM's oversight of the affirmative employment and recruitment programs.

As table 1 shows, the four agencies we were asked to review differed in size, and showed different changes in the numbers of permanent employees in their workforces between 1984, 1992, and 1994.⁵

³Federal Affirmative Action: Better Guidance and Agency Analysis of Underrepresentation Needed (GAO/GGD-91-86, May 10, 1991); Federal Affirmative Action: Better EEOC Guidance and Agency Analysis of Underrepresentation Needed (GAO/T-GGD-91-32, May 16, 1991); and Federal Affirmative Employment: Status of Women and Minority Representation in the Federal Workforce (GAO/T-GGD-92-2, Oct. 23, 1991).

⁴Affirmative Employment: Assessing Progress of EEO Groups in Key Federal Jobs Can Be Improved (GAO/GGD-93-65, Mar. 8, 1993); Federal Affirmative Employment: Better Guidance Needed for Small Agencies (GAO/GGD-94-71, July 21, 1994).

⁵These were the years for which both employment and CLF data were readily available when we did our analysis. The number of permanent employees included all full-time and part-time permanent employees. As a result of congressional and administration initiatives, all of these agencies had smaller workforces at the end of fiscal year 1994.

Table 1: Number of Permanent Employees at the Departments of the Interior, Agriculture, Navy, and State in Fiscal Years 1984, 1992, and 1994

Agency	Fiscal year		
	1984	1992	1994
Interior	58,635	62,007	60,240
Agriculture	96,175	96,932	91,189
Navy	289,705	282,157	244,872
State	12,395	12,152	12,150

Note: Numbers do not include employees whose race or gender information was missing from OPM's CPDF.

Source: OPM's CPDF.

The four agencies also differed in terms of the percentages of their total workforces that were in white-collar and in key white-collar jobs. EEOC defines key jobs as nonclerical occupations with 100 employees or more that are or can lead to middle and senior-level positions. In fiscal year 1992,

- 88.8 percent of Interior's permanent employees were in white-collar jobs, and 33.7 percent in key white-collar jobs.
- 98 percent of Agriculture's permanent employees were in white-collar jobs, and 52.8 percent in key white-collar jobs.
- 68.7 percent of Navy's permanent employees were in white-collar jobs, and 14.8 percent in key white-collar jobs.
- 42.4 percent of State's permanent employees were in white-collar jobs. (State's Foreign Service workforce accounted for 56.7 percent of the agency's total permanent employees).

The analyses presented in chapter 2 address the total, white-collar, and key job workforces at each agency except at the State Department. At State, we examined the Foreign Service workforce in addition to the total and white-collar civil service workforces.⁶

To determine the representation status of women and minorities, we compared each agency's workforce profile with the CLF profile to determine whether the agencies' workforces were representative of the race, ethnic, and gender groups in the CLF. MD-714 and its predecessors instruct that agencies make this comparison for affirmative employment planning purposes. There are different approaches to determining the

⁶We did not do analyses by key job for the State Department's Foreign Service workforce—the focus of our review—because State did not identify key jobs for this segment of its workforce in its affirmative employment plans. These plans provide analyses of State's Foreign Service workforce in terms of “generalists” and “specialists” without reference to key jobs.

appropriate CLF for use in this analysis. The directives encourage agencies to use broad occupational categories—professional, administrative, technical, clerical, other, and blue collar (PATCOB). However, its instructions for the last affirmative planning cycle provided as an alternative the use of occupation specific data. Each approach, as we discussed in a previous report, has advantages and disadvantages.⁷ For example, PATCOB categories can be too general if an occupation being compared requires particular qualifications and educational levels. A disadvantage of the occupation specific data is that it may be difficult to find occupations in the CLF that precisely match the agencies' occupations.

For this report, we made two different comparisons against the CLF. First, we analyzed the agencies' EEO profiles on an overall basis (i.e., all occupations combined) against the national CLF profile. This provided a broad overview of the standing of the different EEO groups in the agencies' total and white-collar workforces. However, this comparison does not take into account the differences in the agencies' occupational mixes and the occupational mix in the CLF. Second, we compared key white-collar occupations that agencies had identified in their affirmative employment plans against specific occupations in the national CLF.⁸ Our analyses covered 10 different EEO groups—white men and women, black men and women, Hispanic men and women, Asian men and women, and Native American men and women.

To assess the degree of representation, we computed representation indexes for overall employment and for key jobs. These indexes were computed by dividing the percentage of each EEO group in each of the four agencies by the corresponding percentage of each EEO group in the CLF and multiplying the result by 100. The indexes can range from 0 to more than 100, with 100 indicating full representation and numbers less than 100 indicating underrepresentation. To the extent an index is much smaller than 100, the underrepresentation is correspondingly more severe.

The federal workforce data we used came from OPM's Central Personnel Data File (CPDF). Our analyses included full-time and part-time permanent employees. CPDF data comes from federal departments and agencies that report to it. We did not verify the accuracy of the CPDF data.

⁷Federal Affirmative Employment: Status of Women and Minority Representation in the Federal Workforce (GAO/T-GGD-92-2, Oct. 23, 1991).

⁸The State Department was excluded from the analyses of key occupations for the reason discussed earlier.

Following EEOC's guidelines, we used the 1990 decennial census CLF data compiled by the U.S. Census Bureau as the benchmark for calculating 1992 representation levels. The use of decennial census data for CLF comparisons is a common approach to measuring the representation of EEO groups in the federal government. However, we recognize that census data, like all other existing benchmarks, have strengths and weaknesses. Census-based CLF data are readily available by EEO group to do analyses of total employment and key jobs (e.g., civil engineers, computer specialists). However, the data become outdated with time⁹ and may require adjustments to compensate for undercounting of minorities. We did not make adjustments to the census data.

EEOC, working with OPM, created a "crosswalk" that matches federal occupations with similar occupations in the decennial census CLF. The crosswalk does not always provide a perfect match between the federal and census occupations, but it is the closest readily available source for making comparisons. We used the crosswalked census occupations for our analysis of agency key jobs.

We analyzed changes in representation levels of different EEO groups at two points in time—the end of fiscal years 1984 and 1992. Fiscal year 1984 was the most distant year for which we had complete data and 1992 the most recent data available. To analyze changes in representation over this period, we used a ratio-based approach.

The ratio-based technique involves comparing ratios of numbers in differing EEO groups. To determine the change in representation levels between 1984 and 1992 for particular EEO groups, we divided the number of employees in the EEO group by the number of white men in each year and then took ratios of those numbers across the years.¹⁰ The term "relative number" used in this report refers to the number of women and minorities for every 100 white men. White men were selected as the benchmark because they dominated the agencies' workforces in 1984 and 1992, especially at General Schedule (GS) grades 14, 15, and senior management levels. It seemed reasonable to consider how the numbers of women and minorities had changed over time relative to them. The ratio-based technique is especially useful in comparing relative changes in workforce representation across EEO groups of very different sizes and

⁹As stated earlier, we did not use current population data because it does not always provide statistically sound numbers for all minority groups when the numbers are small.

¹⁰We introduced this methodology in our March 1993 report.

when the size and growth rates of the total employee population vary during the period studied.

We also used this technique to analyze data on hires, separations, and promotions.¹¹ These personnel events have an effect on the composition of the workforce, and the distribution of EEO groups across grade levels and analyses of these events may provide information to further explain representation trends. For our grade level analysis, we grouped the GS grades as follows: GS grades 1 through 10, 11 through 12, and 13 through 15. We converted the State Department Foreign Service grades to GS-equivalent grades using OPM's guidelines.¹² Our definition of senior management included employees in the SES, State Department's Senior Foreign Service, and State Department's Chief of Mission positions.

To address our second objective—agency compliance with EEOC's instructions—we reviewed relevant statutes, regulations, and EEOC directives. We examined MD-714 and supplemental memorandums issued by EEOC which contain the affirmative employment planning instructions applicable to the period covered in our review.

We discussed the affirmative employment planning instructions with former and current officials from EEOC's Office of Federal Operations in Washington, D.C., and EEOC's Atlanta and Philadelphia District Offices who are responsible for reviewing and approving agencies' affirmative employment plans. (The Atlanta and Philadelphia offices had oversight responsibilities over components of the Navy that we reviewed.) These officials described the factors they considered in reviewing and approving plans and provided us with compliance information for the four agencies we examined. We obtained examples of approval letters and other relevant documentation on the approval process. In addition, we independently reviewed the multiyear affirmative employment plans that the Departments of the Interior, Agriculture, Navy, and State prepared for fiscal years 1988 through 1992 and matched their contents against EEOC's instructions.

¹¹Appendix II explains what is included in the definitions of hires, separations, and promotions for the purposes of this report.

¹²The Foreign Service uses pay plans that identify Foreign Service Officers and Foreign Service Personnel. We consolidated the data and used OPM guidelines to convert the Foreign Service grades to GS-equivalent grades as follows: the Foreign Service grade 9 equals GS-5, grade 8 equals GS-6, grade 7 equals GS-7, grade 6 equals GS-8, grade 5 equals GS-9, grade 4 equals GS-11, grade 3 equals GS-12, grade 2 equals GS-14, and grade 1 equals GS-15.

To determine whether agencies had analyzed each of the eight program elements as required by MD-714, we talked to agency officials about the affirmative employment planning process. We discussed the agencies' multiyear plans with EEO and personnel specialists who described the analysis process and how the documents were prepared. We also asked for and reviewed documentation on the program analyses, comparing the analysis done to the guidance in MD-714. In addition, we interviewed agency supervisors, managers, SES members, and unit heads to document their roles and extent of involvement in affirmative employment planning and confirm whether certain required tasks were completed in the analyses.

To assess the adequacy of EEOC's and OPM's oversight efforts, we reviewed 13 on-site evaluation reports of federal agencies or components that EEOC prepared between 1988 and 1992 to determine program coverage at each site. (EEOC reports included evaluations of the Departments of the Interior and the Navy.) We met with officials in EEOC's Office of Federal Operations to discuss the methodology they used for on-site reviews and their monitoring of agency program implementation. We reviewed EEOC's standard operating procedures for conducting on-site reviews and staff and budget information on the resources that EEOC has allocated to affirmative action planning since fiscal year 1988. In addition, we reviewed EEOC's fiscal year 1990 Annual Report on the Employment of Women, Minorities, and People with Disabilities in the Federal Government.

Likewise, we met with officials from OPM's former Office of Affirmative Recruitment and Employment (now the Office of Diversity) and OPM's Office of Agency Compliance and Evaluation (ACE) (recently merged into the Office of Merit Systems Oversight and Effectiveness) to discuss (1) OPM's responsibilities in monitoring agencies' affirmative recruitment programs; (2) the approach OPM uses to carry out its responsibilities, including the criteria used to evaluate agency FEORP plans; and (3) past and current activities to monitor and evaluate agency affirmative recruitment programs. In addition, we reviewed OPM FEORP reports to Congress for fiscal years 1990 to 1993.

Our audit work was done from February 1992 to March 1995 in accordance with generally accepted government auditing standards. We requested comments on a draft of this report from the heads of Agriculture, EEOC, Interior, OPM, Navy, and State. The Chairman, EEOC; the Director, OPM; the Secretary of the Department of the Interior; and the Deputy Assistant Secretary for Defense (Equal Opportunity) provided

written comments that are discussed in chapters 3 and 4 and reprinted in appendixes III through VI. State's Director of EEO and a program specialist from Agriculture's Office of Personnel provided oral comments.

Agencies Have Made Progress in Reducing the Underrepresentation of Women and Minorities

Federal agencies have been required, as a result of the Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972, to develop and implement affirmative employment programs to eliminate the historical underrepresentation of women and minorities in the workforce. To determine where underrepresentation exists, MD-714 (and its predecessor) provide that federal agencies compare the percentage of a particular minority/gender group in an occupation or job category with the percentage of that same group in the CLF. MD-714 (and its predecessor) further provide that when the federal employment percentage is less than the CLF percentage, underrepresentation exists and should be addressed in the agency's affirmative employment plan. Our analysis of agency compliance with requirements for affirmative employment planning is discussed in chapter 3.

We used two approaches to analyze agency workforce data to determine the representation of women and minorities in the workforce. The first approach involved the use of a ratio-based technique to estimate the relative numbers of women and minorities in the agencies and also the numbers involved in certain personnel events in each year. The technique, which involves comparing ratios of numbers in differing occupational categories, grade levels, or EEO groups, enabled us to perform analyses that are useful for depicting the direction and magnitude of changes over time, and they are especially well suited to comparing the relative changes in workforce representation across groups of very different sizes.

The second approach required comparisons to CLF data, a benchmark external to the agencies. To determine representation levels, we computed representation indexes using agency workforce data and national CLF data from the 1990 census. The indexes indicate the extent to which an EEO group is represented in a workforce as compared to that group's representation in the CLF. The index can range from 0 to 100 plus, with 100 indicating full representation and lower numbers indicating underrepresentation.

Generally, we found that the Departments of the Interior, Agriculture, Navy, and State made progress towards improving the EEO composition of their workforces. The relative numbers of white women and minorities in the agencies' workforces increased between 1984 and 1992.¹ Moreover, the relative number of women and minorities in the agencies' key white-collar jobs increased across all grade levels between 1984 and 1992. Also, the

¹Relative means in relation to white men, the benchmark we used for comparison purposes. White men were the predominant group in the agencies' workforces in the years reviewed.

agencies hired and promoted women and minorities into key white-collar jobs in relative numbers that generally equalled or exceeded their relative numbers employed over the period reviewed. However, white and minority women in all agencies and minority men at Interior in 1992 separated at higher rates than white men. Underrepresentation of women and minorities—especially in key jobs—remained in these agencies. White women in all the agencies and minority women at Agriculture were underrepresented on an overall basis in the total and white-collar workforces in fiscal year 1992 when compared to the national CLF. Most EEO groups continued to be underrepresented in key white-collar jobs in relation to their representation in similar occupations in the CLF.

Appendix I provides more data on the results of our analyses. The following sections focus on the relative changes in women and minority representation overall and in the agencies' key jobs by grade level.

Changes in the Relative Representation of Women and Minorities

In this section, we analyze overall changes in the numbers of women and minorities relative to the numbers of white men. This approach involves comparing ratios of employment numbers for differing EEO groups between 1984 and 1992.

Figures 2.1 through 2.3 show that, in virtually all workforces at each agency, the numbers of white women and minorities employed increased relative to the number of white men.² The increases were generally larger for white and minority women than for minority men. The relative numbers in these figures indicate, in each year, the number of white women, minority men, and minority women there were for every 100 white men. These relative numbers were calculated by dividing the number of employees in each protected EEO group by the number of white men, and multiplying by 100.

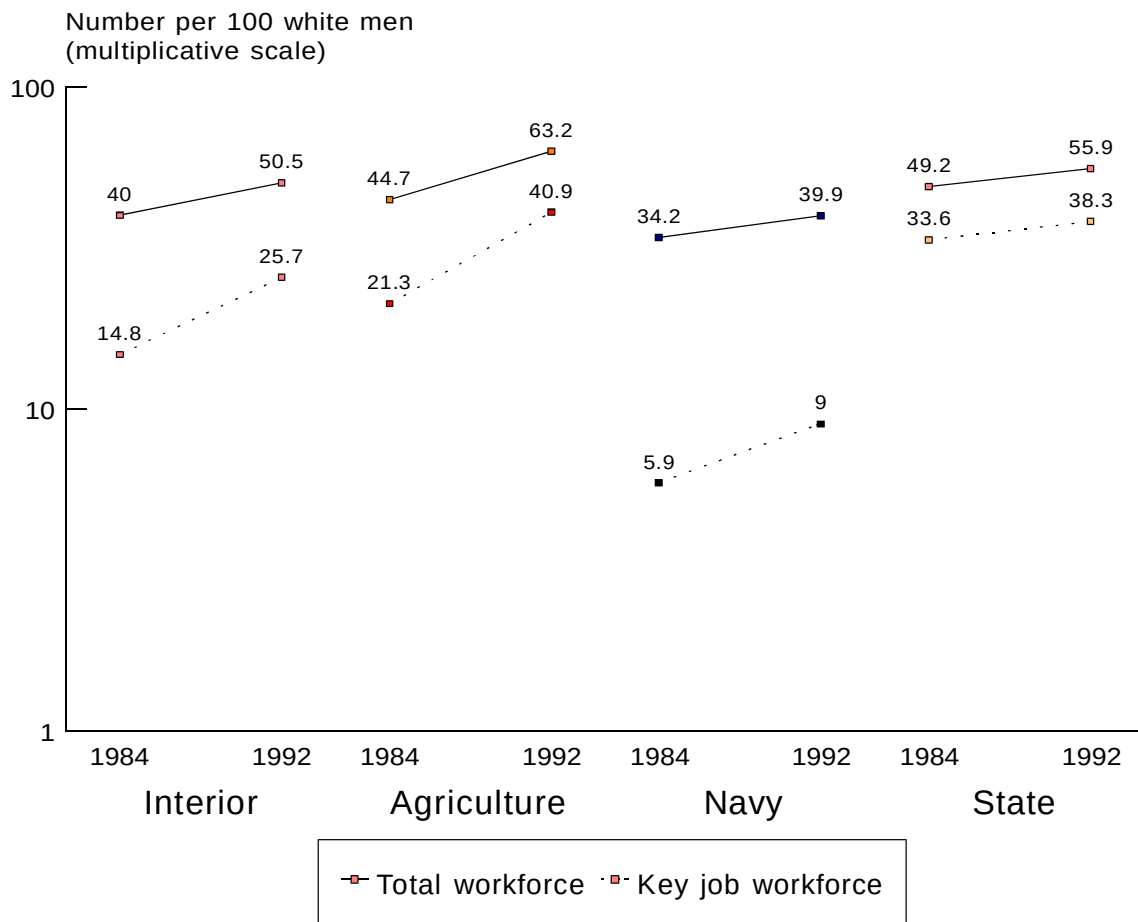
Notwithstanding the increases in relative numbers, in both fiscal year 1984 and fiscal year 1992 white women and minorities were represented in lower relative numbers in the agencies' key white-collar occupations and in the Department of State's Foreign Service workforce than in the agencies' total workforces. As seen in figures 2.1 through 2.3, this condition appears somewhat more pronounced for white and minority women than for minority men.

²As shown in appendix tables I.1 through I.4 there were some exceptions. For example, black men in the total workforce at Navy, white women in the white-collar workforce at Navy, and Hispanic men in the total and white-collar workforces at State showed slight declines in their relative numbers.

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We divided the relative number for the latest fiscal year (1992) by the relative number for the beginning fiscal year (1984) to express the amount of change that had occurred. A resulting ratio of 1.0 indicates no change in percentage or relative number; ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease. Tables 2.1, 2.2, and 2.3 display these results.

Figure 2.1: Relative Numbers of White Women at the Four Agencies in Fiscal Years 1984 and 1992



Source: OPM's CPDF.

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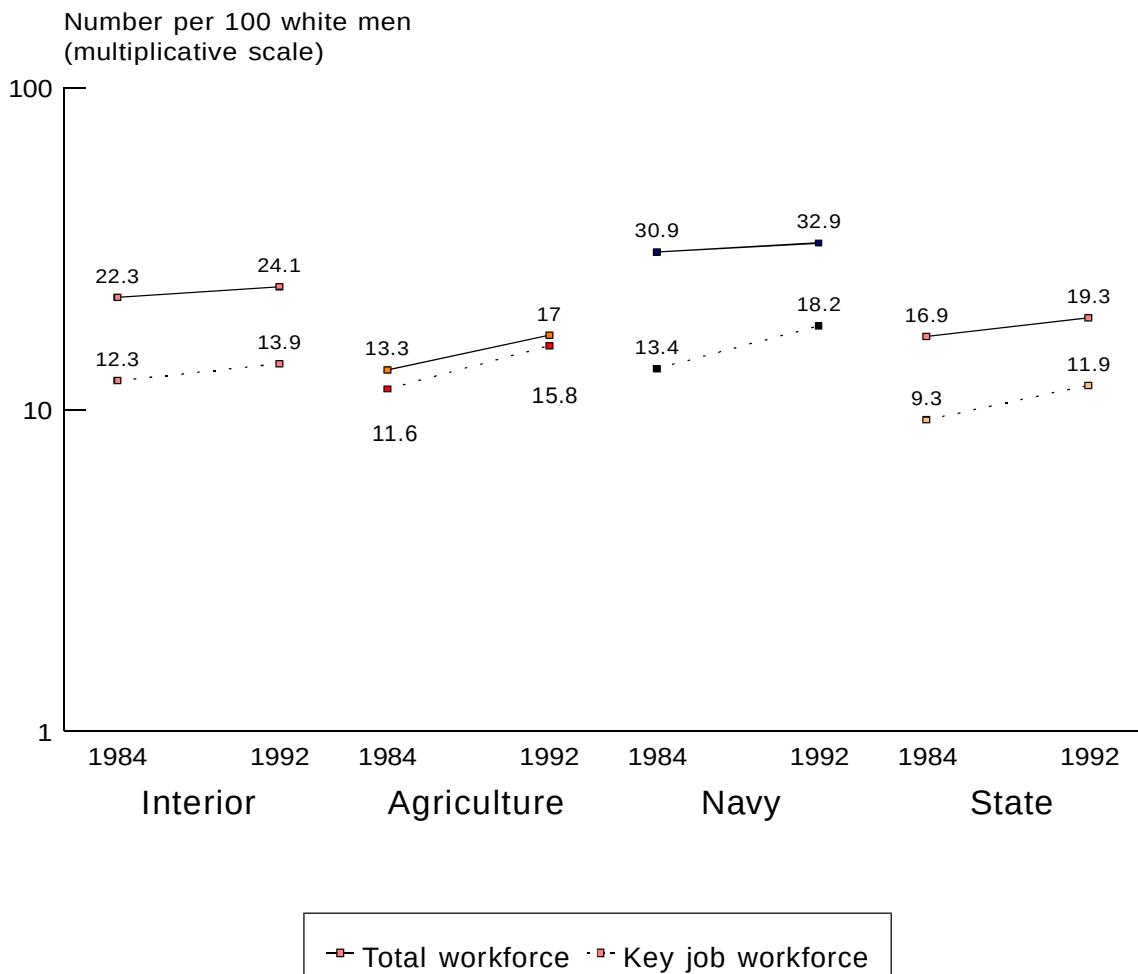
Table 2.1: Ratio of Change for White Women at the Four Agencies in Fiscal Years 1984 and 1992

Agency	Ratio: 1992 to 1984	
	Total workforce	Key job workforce
Interior	1.26	1.74
Agriculture	1.41	1.92
Navy	1.17	1.52
State	1.13	1.14

Note: A ratio of 1.0 indicates no change in percentage or relative number. Ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

Source: OPM's CPDF.

Figure 2.2: Relative Numbers of Minority Men at the Four Agencies in Fiscal Years 1984 and 1992



Source: OPM's CPDF.

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Table 2.2: Ratio of Change for Minority Men at the Four Agencies in Fiscal Years 1984 and 1992

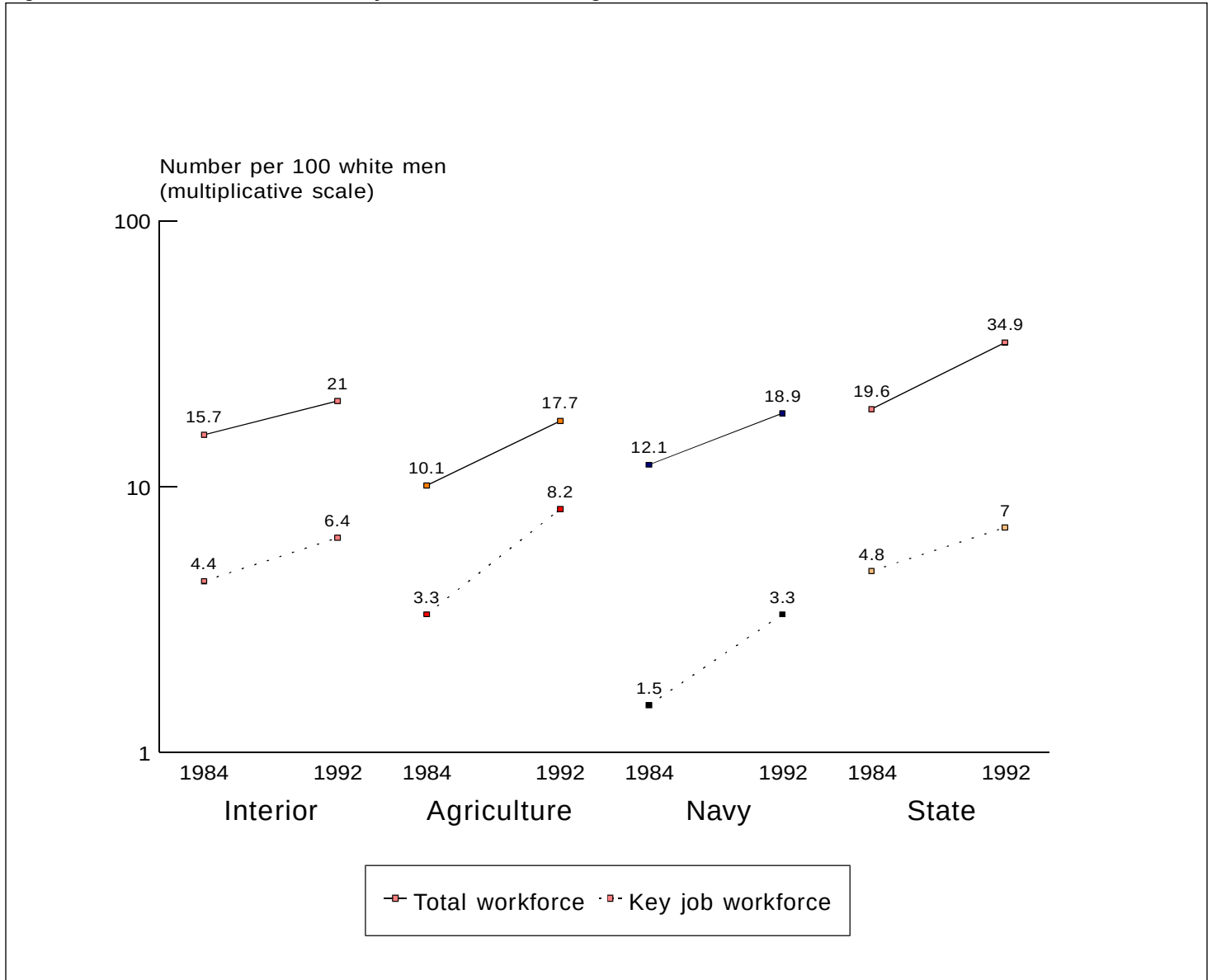
Agency	Ratio: 1992 to 1984	
	Total workforce	Key job workforce
Interior	1.08	1.14
Agriculture	1.28	1.36
Navy	1.06	1.36
State	1.14	1.27

Note: A ratio of 1.0 indicates no change in percentage or relative number. Ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

Source: OPM's CPDF.

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Figure 2.3: Relative Numbers of Minority Women at the Four Agencies in Fiscal Years 1984 and 1992



Source: OPM's CPDF.

Table 2.3: Ratio of Change for Minority Women at the Four Agencies in Fiscal Years 1984 and 1992

Agency	Ratio: 1992 to 1984	
	Total workforce	Key job workforce
Interior	1.32	1.45
Agriculture	1.75	2.50
Navy	1.56	2.13
State	1.78	1.45

Note: A ratio of 1.0 indicates no change in percentage or relative number. Ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

Source: OPM's CPDF.

Changes in the Relative Standing of Women and Minorities in the Agencies' Key Jobs, by Grade Level

How much progress have the agencies made in improving the standing of women and minorities in their key job grade structure between fiscal years 1984 and 1992? The relative number of women and minorities in key white-collar jobs at Interior, Agriculture, and Navy, and in the State Department Foreign Service increased across all GS grades (i.e., GS grades 1 through 10, 11 through 12, and 13 through 15) over the period we reviewed.³ Women and minorities also made strides in the agencies' SES ranks and in State's Foreign Service top positions—Senior Foreign Service Officers and Chiefs of Mission—between fiscal years 1984 and 1992. However, as figures 2.4 through 2.7 and tables 2.4 through 2.7 show as of fiscal year 1992, women and minorities were still less well represented in the agencies' middle and senior management levels (grades 13 and above) than in the lower levels of the agencies' hierarchies.

Relative Representation at Grades 15 and Below

The relative numbers of white women and minorities at Interior, Agriculture, and Navy increased at every grade level.⁴ Increases in relative numbers were, at grade 15 and below in these three agencies, generally larger for white and minority women than for minority men. The only exception was for grades 1 through 10 at Navy, where the increase in the relative number of minority men was greater than that for white women.

³For the State Department Foreign Service we used GS-equivalent grades.

⁴Appendix tables I.5 through I.7 show a decrease in the percentage of specific groups of minority men in key jobs at some grade levels at these three agencies. Namely, at Interior, there was a decrease in the percentage of Asian men at grades 1 through 10, and in both their percentage and relative numbers at grades 13 through 15. There was a decline in the percentage of Native American men at grades 11 to 12 at Interior, and in both their percentage and relative numbers at grades 13 through 15 at Navy. The percentage of black men at grades 1 through 10 decreased at Interior and Agriculture, though their relative numbers increased at those lower grades.

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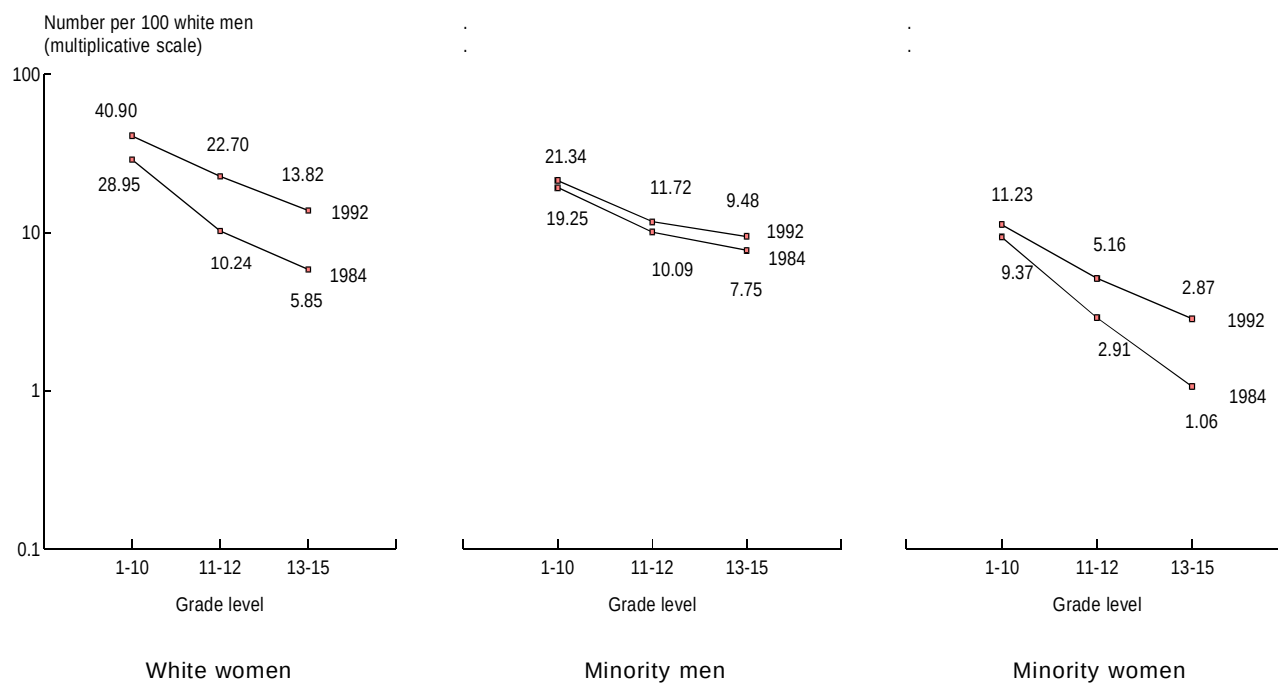
Among State's Foreign Service employees, only white women increased in representation at all three grade levels.⁵ The percentage of minority men increased at grades 13 through 15 but decreased at grades 11 and 12, while the percentage of minority women increased at grades 1 through 10 and 13 through 15 but decreased at grades 11 and 12. The percentage of white men in the Foreign Service workforce decreased at all three grade levels. The relative numbers of white women and minority men either increased or, in the case of minority men and women at grades 11 to 12, remained virtually the same.⁶

⁵Following OPM's definitions, we converted the Foreign Service grades to equivalent GS grades. We used pay plan codes for Foreign Service Officers and personnel.

⁶Although the percentage of minority men decreased in State's Foreign Service workforce at GS-equivalent grades 1 through 10, table I.8 shows that only Asian men decreased in their number relative to white men. Black men and women and Native American men all decreased, both in their percentage and relative numbers, at GS-equivalent grades 11 to 12. None of the specific categories of minorities, men or women, decreased in their representation at GS-equivalent grades 13 through 15, and most in fact increased in representation at those upper levels quite substantially.

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Figure 2.4: Relative Numbers of White Women and Minority Men and Women in Key Jobs at Interior in Fiscal Years 1984 and 1992, by Grade Level



Source: OPM's CPDF.

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Table 2.4: Ratio of Change for White Women and Minority Men and Women at Different Grade Levels in Key Jobs at Interior From Fiscal Year 1984 to Fiscal Year 1992

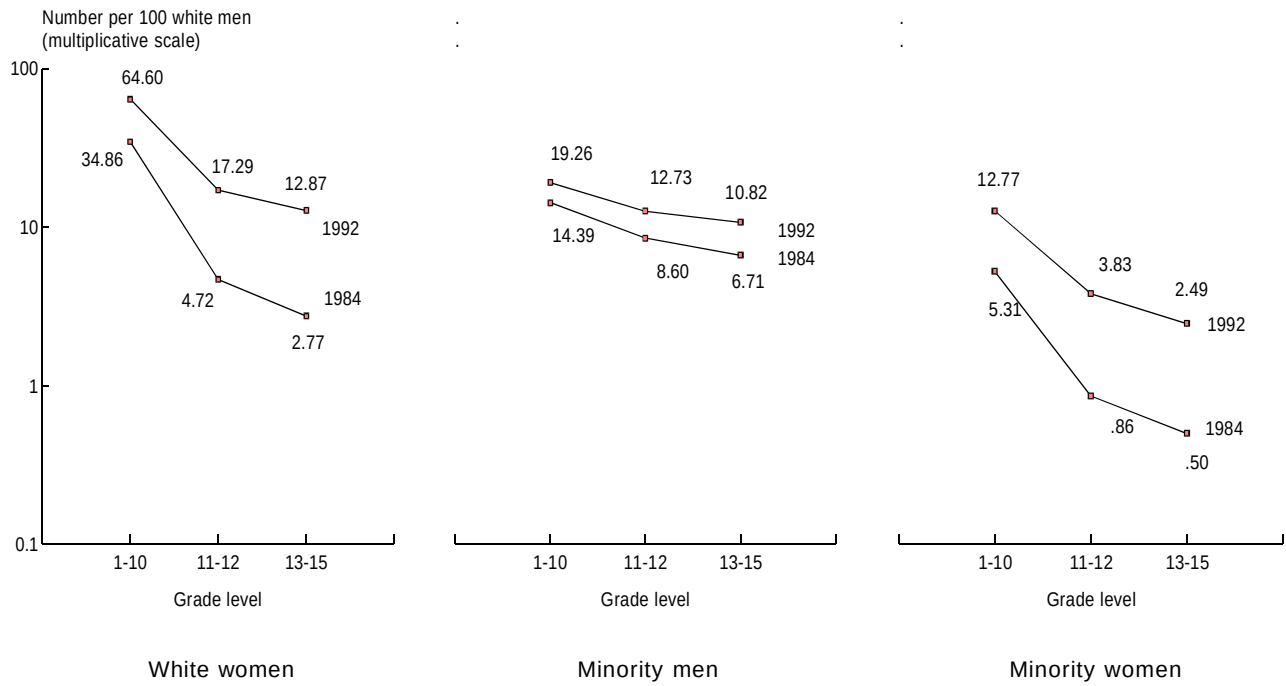
EEO group	Ratio: 1992 to 1984		
	Grades 1-10	Grades 11-12	Grades 13-15
White women	1.41	2.22	2.36
Minority men	1.11	1.16	1.22
Minority women	1.20	1.77	2.71

Note: A ratio of 1.0 indicates no change in percentage or relative number. Ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

Source: OPM's CPDF.

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Figure 2.5: Relative Numbers of White Women and Minority Men and Women in Key Jobs at Agriculture in Fiscal Years 1984 and 1992, by Grade Level



Source: OPM's CPDF.

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Table 2.5: Ratio of Change for White Women and Minority Men and Women at Different Grade Levels in Key Jobs at Agriculture From Fiscal Year 1984 to Fiscal Year 1992

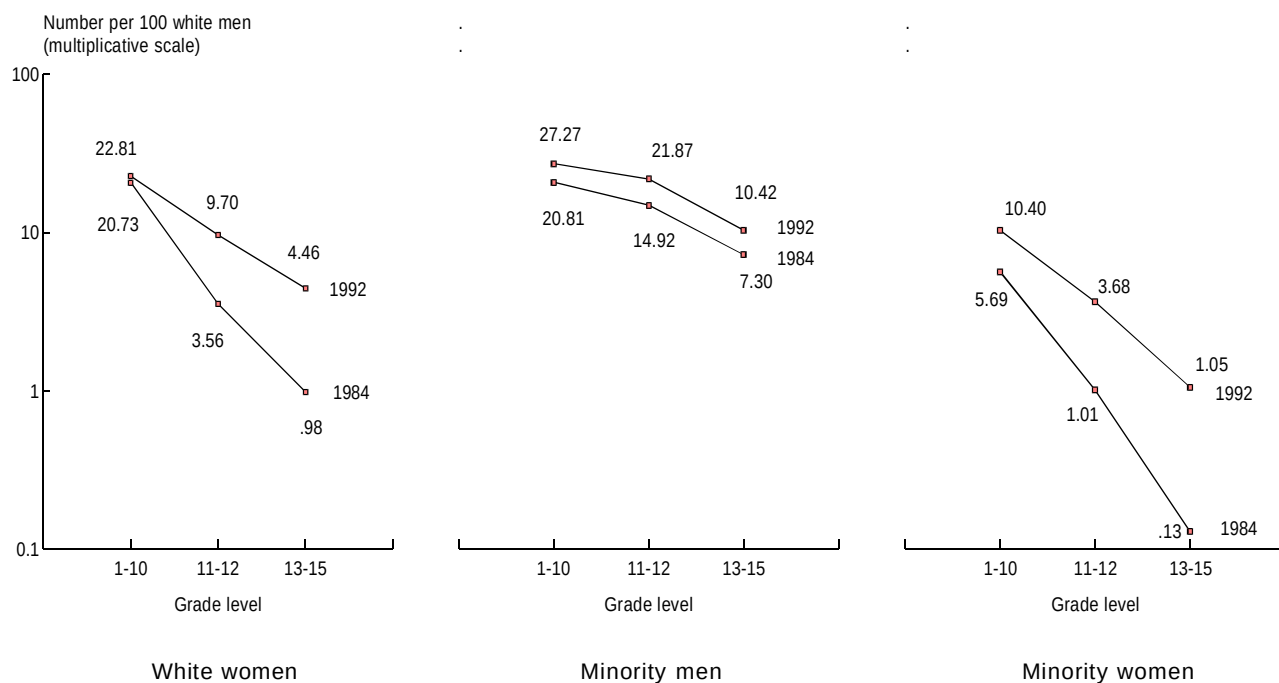
EEO group	Ratio: 1992 to 1984		
	Grades 1-10	Grades 11-12	Grades 13-15
White women	1.85	3.66	4.65
Minority men	1.34	1.48	1.61
Minority women	2.40	4.45	5.53

Note: A ratio of 1.0 indicates no change in percentage or relative number. Ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

Source: OPM's CPDF.

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Figure 2.6: Relative Numbers of White Women and Minority Men and Women in Key Jobs at Navy in Fiscal Years 1984 and 1992, by Grade Level



Source: OPM's CPDF.

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Table 2.6: Ratio of Change for White Women and Minority Men and Women at Different Grade Levels in Key Jobs at Navy From Fiscal Year 1984 to Fiscal Year 1992

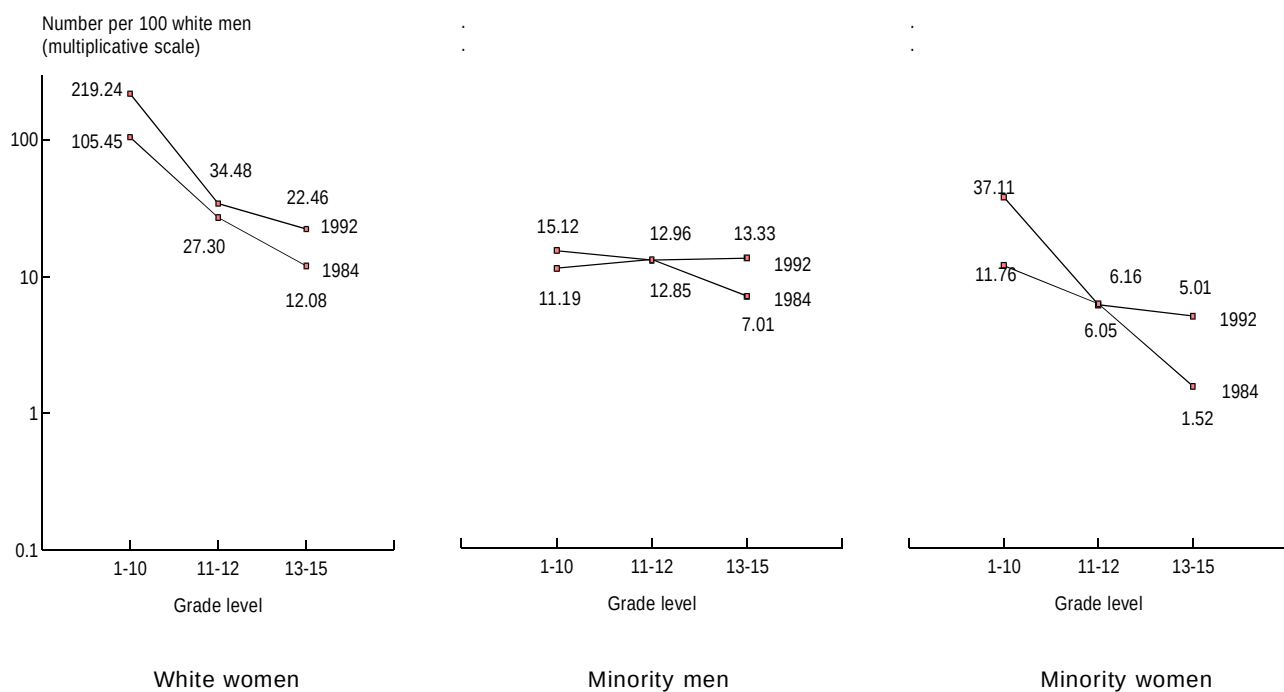
EEO group	Ratio: 1992 to 1984		
	Grades 1-10	Grades 11-12	Grades 13-15
White women	1.10	2.72	4.55
Minority men	1.31	1.47	1.43
Minority women	1.83	3.64	8.08

Note: A ratio of 1.0 indicates no change in percentage or relative number. Ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

Source: OPM's CPDF.

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Figure 2.7: Relative Numbers of White Women and Minority Men and Women in Foreign Service Jobs at State in Fiscal Years 1984 and 1992, by Grade Level



Source: OPM's CPDF.

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Table 2.7: Ratio of Change for White Women and Minority Men and Women at Different Grade Levels in Key Jobs at State From Fiscal Year 1984 to Fiscal Year 1992

EEO group	Ratio: 1992 to 1984		
	Grade 1-10	Grades 11-12	Grades 13-15
White women	2.08	1.26	1.86
Minority men	1.35	0.99	1.90
Minority women	3.16	0.98	3.30

Note: A ratio of 1.0 indicates no change in percentage or relative number. Ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

Source: OPM's CPDF.

Relative Representation in
Agencies' SES and Top
Foreign Service Positions

In general, the relative numbers of white women and minorities in the SES and in the Department of State's top Foreign Service positions—Senior Foreign Service Officers and Chiefs of Mission—increased between 1984 and 1992. The exception was minority men in State's SES and Chiefs of Mission. (See table 2.8.) The size of the increases varied by agency and group. White women experienced the greatest gains in the SES level at all agencies except at Interior, where minority women showed the highest rate. However, as table 2.8 shows, white men continued to dominate the higher ranks of the agencies reviewed, accounting for 75 percent or more of the agencies' top positions in 1992.

Table 2.8: Distribution of Women and Minorities in SES and Top Foreign Service (FS) Positions at the Four Agencies Reviewed

Agency	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Interior									
White men	219	214	-5	84.23	74.83	0.89			
White women	13	25	12	5.00	8.74	1.75	5.94	11.68	1.97
Minority men	26	39	13	10.00	13.64	1.36	11.87	18.22	1.54
Minority women	2	8	6	0.77	2.80	3.64	0.91	3.74	4.11
Total	260	286	26	100.00	100.01				
Agriculture									
White men	287	299	12	91.99	79.52	0.86			
White women	10	47	37	3.21	12.50	3.89	3.48	15.72	4.52
Minority men	12	25	13	3.85	6.65	1.73	4.18	8.36	2.00
Minority women	3	5	2	0.96	1.33	1.39	1.05	1.67	1.59
Total	312	376	64	100.01	100.00				
Navy									

(continued)

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Agency	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
White men	368	392	24	94.12	91.80	0.98			
White women	7	16	9	1.79	3.75	2.10	1.90	4.08	2.15
Minority men	16	18	2	4.09	4.22	1.03	4.35	4.59	1.06
Minority women	0	1	1	0.00	0.23	^a	0.00	0.26	^a
Total	391	427	36	100.00	100.00				
State (SES)									
White men	82	104	22	82.83	78.79	0.95			
White women	10	18	8	10.10	13.64	1.35	12.20	17.31	1.42
Minority men	7	7	0	7.07	5.30	0.75	8.54	6.73	0.79
Minority women	0	3	3	0.00	2.27	^a	0.00	2.88	^a
Total	99	132	33	100.00	100.00				
State (SFS) ^b									
White men	651	585	-66	93.53	87.18	0.93			
White women	24	57	33	3.45	8.49	2.46	3.69	9.74	2.64
Minority men	21	24	3	3.02	3.58	1.19	3.23	4.10	1.27
Minority women	0	5	5	0.00	0.75	^a	0.00	0.85	^a
Total	696	671	-25	100.00	100.00				
State (COM) ^c									
White men	91	95	4	90.10	84.82	0.94			
White women	4	9	5	3.96	8.04	2.03	4.40	9.47	2.15
Minority men	6	5	-1	5.94	4.46	0.75	6.59	5.26	0.80
Minority women	0	3	3	0.00	2.68	^a	0.00	3.16	^a
Total	101	112	11	100.00	100.00				

Note: There were 136 FS-SESs in 1992, but 4 were missing EEO information. There were 672 FS-SFSs in 1992, but 1 was missing EEO information. There were 115 FS-COMs in 1992, but 3 were missing EEO information.

^aThe amount of change (increase or decrease) cannot be computed because there was no one (0.00) in that EEO group at that grade level in the base year (1984).

^bSFS is an abbreviation for Senior Foreign Service.

^cCOM is an abbreviation for Chief of Mission.

Source: OPM's CPDF.

Comparisons of the Agencies' and the Civilian Labor Forces

We compared the EEO profiles of the four agencies' workforces as of September 1992 with the EEO profile of the nation's CLF in 1990 to determine if the agencies' workforces were representative of the CLF. Using an index where less than 100 indicates underrepresentation, we

found that certain EEO groups were often underrepresented on an overall basis (all occupations combined) and in key jobs in 1992 when compared to the CLF. The extent of underrepresentation, as discussed below, varied by agency and EEO group.

Overall Representation of Women and Minorities in Comparison to the CLF

White women in all four agencies, minority men at Agriculture and State, and minority women at Agriculture and Navy, were underrepresented in the total workforces of these agencies in 1992 when compared to 1990 CLF data. In the white-collar workforce, white women were underrepresented in the four agencies reviewed, while minority women were underrepresented only at Agriculture. The other groups were fully represented in both the total and white-collar workforces.⁷ See table 2.9 and figure 2.7.

Table 2.9: Representation of Women and Minorities in Four Agencies Compared to the CLF (as of September 1992)

EEO group	Total workforce								
	Percentage					Representation index			
	Civilian	Interior	Agriculture	Navy	State	Interior	Agriculture	Navy	State
White men	42.6	51.1	50.5	52.2	47.6	120	119	123	112
White women	35.3	25.8	31.9	20.8	26.6	73 ^a	90 ^a	59 ^a	75 ^a
Minority men	11.6	12.3	8.6	17.1	9.2	106	74 ^a	147	79 ^a
Minority women	10.4	10.7	8.9	9.9	16.6	103	86 ^a	95 ^a	160
White-collar workforce									
EEO group	Civilian	Interior	Agriculture	Navy	State	Interior	Agriculture	Navy	State
White men	37.8	49.4	50.2	47.2	47.7	131	133	125	126
White women	44.0	28.8	32.5	28.7	26.9	65 ^a	74 ^a	65 ^a	61 ^a
Minority men	7.6	9.9	8.3	11.0	8.8	130	109	145	116
Minority women	10.6	11.9	9.1	13.1	16.7	112	86 ^a	124	158

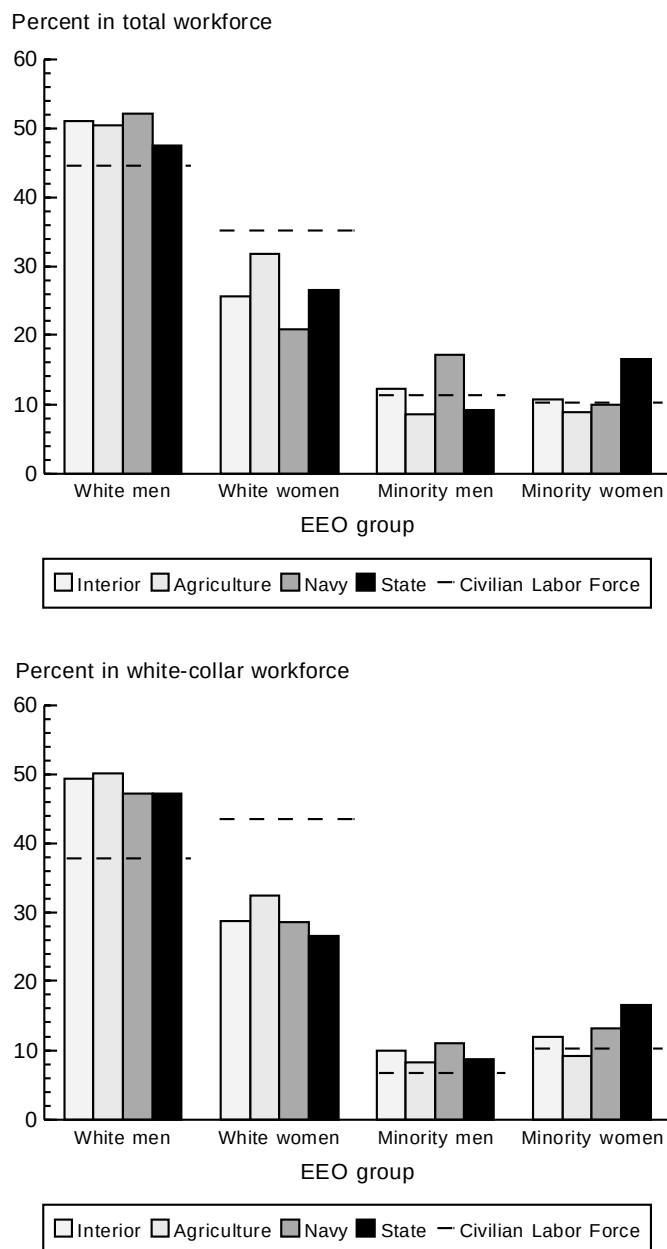
^aNumbers under 100 indicate underrepresentation.

Source: Percentages for each of the four agencies are from OPM's CPDF for fiscal year 1992. CLF data are from the 1990 census.

⁷The percentages in the different EEO groups at State in fiscal year 1992 were arrived at by combining white-collar Civil Service employees and white-collar Foreign Service employees. The EEO composition of those two groups of employees was, however, quite different. White men constituted 63.7 percent of the white-collar Foreign Service workforce, but only 26.5 percent of the white-collar Civil Service workforce. White women, minority men, and minority women constituted 24.4 percent, 7.5 percent, and 4.4 percent of the white-collar Foreign Service workforce, respectively, but 30.1 percent, 10.4 percent, and 33 percent of the white-collar Civil Service workforce.

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Minorities

Figure 2.8: Representation of Women and Minorities in Four Agencies Compared to the CLF as of September 30, 1992



Source: OPM's CPDF data and CLF data.

**Representation of Women
and Minorities in the
Agencies' Key Jobs in
Comparison to Specific
Jobs in the CLF**

Our analysis of 49 key white-collar jobs (18 at Agriculture, 17 at Interior, and 14 at Navy) showed that women and minorities were underrepresented in many of the key jobs that we reviewed at these three agencies in relation to their representation in the CLF for those same occupations.⁸ Table 2.9 shows that white women, blacks, Hispanics, and Asian women were the groups most often severely underrepresented at the agencies reviewed.

⁸The Department of State was not included in this key job analysis because State's affirmative action plan does not provide information on key jobs. State's workforce analysis only distinguishes among the foreign service specialists and generalists and civilian employees.

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Table 2.10: Numbers of Key Jobs at Three Agencies in Which Different EEO Groups Were Underrepresented and Severely Underrepresented

	Agency					
	Agriculture		Interior		Navy	
	Number	Percent	Number	Percent	Number	Percent
Number of key jobs	18		17		14	
Number and percent of key jobs with any underrepresentation	18	100	17	100	14	100
Number and percent of key jobs with underrepresentation of						
White women	13	72	13	76	8	57
Black men	9	50	12	71	8	57
Black women	14	78	14	82	7	50
Hispanic men	13	72	8	47	9	64
Hispanic women	12	67	14	82	9	64
Asian men	13	72	14	82	2	14
Asian women	13	72	13	76	6	43
Native American men	4	22	2	12	6	43
Native American women	6	33	2	12	7	50
Number and percent of key jobs with any severe underrepresentation	16	89	16	94	11	79
Number and percent of key jobs with severe underrepresentation of						
White women	8	44	9	53	4	29
Black men	6	33	10	59	2	14
Black women	7	39	12	71	3	21
Hispanic men	6	33	3	18	1	7
Hispanic women	11	61	10	59	5	36
Asian men	9	50	10	59	0	0
Asian women	7	39	10	59	2	14
Native American men	3	17	1	6	3	21
Native American women	3	17	1	6	6	43

Note: For this table, we considered a key job to be severely underrepresented if the representation index was less than 50.

Source: OPM's CPDF.

Hires, Separations, and Promotions in Fiscal Years 1984 and 1992

Thus far, we have analyzed changes in the percentages and relative numbers of women and minorities employed in the agencies, as of the end of fiscal years 1984 and 1992. Also for 1992, we compared agency workforces with the 1990 CLF. To better understand the agencies' efforts to diversify their workforces, it is important to examine the personnel actions that bring employees into and out of the agencies' workforces, and identify their advancement in the workforces at any point during those 2 years. This section focuses on some of these actions: hires, separations, and promotions. (These terms, as used in this report, are defined and more data on the results of our analyses are included in app. II.) Overall, agencies hired and promoted women and minorities at rates that would increase their share of the agencies' workforces, but separation rates for certain EEO groups were high. This higher rate of separations limited the agencies' overall progress in achieving a representative workforce.

Hires

In general, all four agencies hired women and minorities into their key white-collar occupations or, at State, the Foreign Service workforce, in percentages and relative numbers that exceeded the percentages and relative numbers at which they were employed in fiscal years 1984 and 1992. (See tables II.1 through II.4.) For example, as table II.1 shows, Interior hired 43 white women for every 100 white men hired in fiscal year 1992 into the key white-collar workforce, when it had 26 white women employed per 100 white men. It hired 16 minority men for every 100 white men hired in fiscal year 1992 when there were 14 minority men per 100 white men in the workforce. In other words, white women and minority men at Interior were hired at rates that would (disregarding separations) have increased their relative numbers in the workforce.

As tables II.1 through II.4 show, the exceptions in fiscal year 1984 were minority women at Interior and minority men and women at Agriculture, who were hired in key white-collar jobs in lower relative numbers than those at which they were employed. Similarly, in fiscal year 1992, the relative numbers of women and minorities who were hired in State's Foreign Service did not exceed the relative numbers employed.⁹

⁹These comments pertain to the general categories of minority men and women. However, appendix tables II.1 through II.4 show quite a number of specific groups with low entry rates, or low relative numbers entering, in one or both of the fiscal years for which we have data. In fiscal year 1992, for example, black, Hispanic, and Asian men all entered key jobs at Interior in lower relative numbers than those at which they were employed, though these differences were not very large. At State in fiscal year 1992, black and Hispanic men and women entered in lower relative numbers than those at which they were employed. At Navy in that same fiscal year, black men and Native American women entered in lower relative numbers than those at which they were employed.

Separations

As tables II.1 through II.4 also show, the relative numbers at which the agencies hired women and minorities were generally greater than the relative numbers at which members of these groups were separated from the agencies. This was true in fiscal year 1992 for women and minorities at all four agencies, except for white women at State. In 1984 the exceptions were minority women at Interior and minority men at Agriculture. However, tables II.1 through II.4 show that there were many instances in which the separation rates exceeded the rates at which women and minorities were employed.

High separation rates for white women were apparent in all agencies except at State in fiscal year 1984, and in all four agencies in 1992. For example, 49 white women per 100 white men separated from Agriculture in fiscal year 1992, when there were 41 white women employed per 100 white men. The separation rates for minority women were high in fiscal year 1992 at Interior, Agriculture, and Navy.¹⁰ Interior was the only agency in which the relative number of minority men separating from key white-collar jobs exceeded the relative number employed in fiscal year 1992. These situations signal a pattern that if continued would be detrimental to continued progress to achieve a representative workforce.

Promotions

Promotions do not add or subtract from the workforce population, but can affect the distribution of different groups across the agencies' grade structure. In fact, because considerably larger segments of the workforces were promoted in a given year than were hired or separated, promotions have the potential to make a considerably greater impact on the distribution of women and minorities than do either hires or separations.

Our analysis showed that, in all four agencies, the relative numbers of white women and minority men and women promoted were greater than the relative numbers employed in key white-collar or Foreign Service jobs both in fiscal years 1984 and 1992. The only specific EEO groups with lower promotion rates than employment rates in fiscal year 1992 were Asian men at Interior and State and Native American men at Navy and State.

¹⁰At Interior in fiscal year 1992, Asian men and women and Native American women were the only minority groups not separating in higher relative numbers than those at which they were employed. At Agriculture in that year black women and Native American men and women were separating in higher relative numbers than those at which they were employed, while at Navy in fiscal year 1992 black and Asian women, Hispanic men, and Native American men were separating in higher relative numbers. At State, only black and Native American men were separating in higher relative numbers than those at which they were employed in 1992.

Conclusions

In general, the four agencies we reviewed increased their employment of women and minorities between fiscal years 1984 and 1992. Even in those workforces in which the percentages of white women and minority men declined, the decreases were usually less than those of white men. Consequently, in almost all cases, the number of women and minorities increased relative to the numbers of white men.

In fiscal year 1992, women and minorities (1) were represented in lower relative numbers in the agencies' key jobs and in State's Foreign Service jobs than in the agencies' total workforces, (2) were often underrepresented when compared to the CLF, and (3) remained less well represented in higher grades than in lower grades.

For the most part, women and minorities in the agencies reviewed experienced favorable hiring and promotion rates in fiscal years 1984 and 1992, which contributed to the increases in their employment numbers. That is, agencies hired and promoted women and minorities at rates that often exceeded their relative numbers employed. However, in three agencies (all except State), white and minority women were separated in relative numbers that exceeded the relative numbers at which they were employed in 1992. This was true also of minority men at Interior. These conditions limited agencies' progress in diversifying their workforces. EEOC instructions provide that agencies should analyze their workforces to identify representation problems, causes, and actions needed to address them. The next chapter discusses how well agencies' affirmative employment planning efforts followed EEOC instructions.

Agencies' Affirmative Employment Planning

The affirmative employment planning program analyses that the Departments of the Interior, Agriculture, Navy, and State undertook for fiscal years 1988 through 1992 reporting cycle did not completely address all eight program elements included in EEOC's MD-714 planning and reporting instructions. Several factors contributed to this condition. The agencies often lacked the data necessary to identify problems. According to agency EEO officials, senior managers were rarely involved in affirmative employment planning and saw the preparation of plans as something someone else (e.g., the EEO Director) was supposed to accomplish.

Agencies' Planning Program Analyses Efforts Did Not Fully Comply With EEOC Directives

Agencies' affirmative employment planning program analyses efforts did not adhere to EEOC's MD-714 directive in several ways. The agencies did not include the complete program analyses MD-714 instructs them to do to identify the fundamental causes of underrepresentation. In addition, those agencies that established numerical goals for improving EEO representation failed to relate them to specific underrepresentation problems as EEOC instructions provide.

Compliance With Program Analysis Instructions

Under MD-714, the first step an agency should take to develop an affirmative employment multiyear plan is to do a comprehensive program analysis of eight program elements: workforce composition, recruitment and hiring, employee development, promotions, separations, discrimination complaints, organization and resources, and program evaluation. According to the MD-714, after conducting a program analysis of the affirmative employment program within the agency, problems and barriers shall then be identified. According to an EEOC memorandum on affirmative employment planning, agencies should maintain documentation to support their identification of barriers and development of objectives.

None of the agency program analyses we reviewed fully addressed the eight program elements.¹ Interior fully analyzed only one of the eight program elements; Agriculture, three; State, three; and Navy, two. None of the four agencies fully addressed four of eight program elements (recruitment and hiring, promotions, separations, and program evaluation). Handling discrimination complaints was the only program element that all four agencies fully analyzed.

¹We determined that an agency's program analysis was in partial compliance with EEOC's instructions if (1) the analysis did not contain information addressing the majority of MD-714 program analysis questions and requirements and (2) the agency officials responsible for the affirmative employment program plans had no documentation or answers to the questions and requirements listed in MD-714.

For example, the workforce composition component of Interior's analyses did not address EEO representation levels by key jobs as required by MD-714. In addition, Interior combined all the women and minority groups in its grade level analysis. A breakdown of grade level data by EEO group is called for by MD-714. A breakdown by EEO group is particularly important at Interior because of its high concentration of Native Americans and underrepresentation of other EEO groups. An official from Interior's Office of Equal Opportunity said that analyzing workforce data by key jobs and grade requires significant manual effort. He added that the department lacks the computer capability and staff resources to conduct detailed analyses.

Only one of the four agencies' analysis addressed all the relevant information on employee development programs. For example, two key training questions listed in MD-714 and not addressed in the agencies' analyses were:

- "Has a survey of current skills and training of the agency's workforce been conducted to determine the availability of employees from the EEO Groups, having skills required to meet agency staffing needs?"
- "Have studies been conducted on time-in-grade to determine the reasons for any differentials which may exist by minority status and sex?"

EEOC stated that the program analysis questions in MD-714 are considered as guidance and not specific requirements. However, EEOC's memorandum on federal affirmative employment planning dated January 21, 1988, suggests otherwise. The memorandum states that "The program analysis is the foundation upon which the agency's entire plan will be based. Therefore, each agency should ensure that it performs a comprehensive assessment of how the agency's efforts are directed toward the eight major program elements. The analysis must provide complete rationale for responses to the questions that follow each element. It is not necessary that the analysis be limited to just those questions." The memorandum also states that agencies should maintain documentation which supports the agency's identification of barriers and development of objectives.

However, agency officials from two of the agencies we reviewed also said that they considered the questions in MD-714 as guidance rather than requirements that must be met. Agency officials also said that EEOC did not always ask agencies to provide comprehensive answers to the program analysis questions when it reviewed their plans.

Another reason for the incomplete analysis of the program elements is that agencies did not fully analyze personnel event data (e.g., data on recruitment, hires, training, promotions, and separations). We discuss this issue later within this chapter. In prior reports we have recommended that EEOC expand the agency workforce analysis requirements to include (1) major occupation workforce data by grade level or grade groupings, and (2) analysis of hiring, training and development, promotion, and separation data.² We believe that these additional analyses are critical to fully understanding the causes for trends in underrepresentation and overcoming barriers to achieving a representative workforce. We also have recommended that EEOC provide agencies with better guidance on what constitutes a major occupation and additional guidance on what to analyze. EEOC agreed with these recommendations and has addressed them in its proposed new management directive.

Incomplete Barrier Identification

MD-714 provides that agencies should examine their personnel and management policies, practices, and procedures to determine whether they limit or act as barriers to the representative employment of women and minorities. MD-714 instructs agencies to identify barriers in their multiyear affirmative employment plans and to provide narrative describing the barriers. While the agency plans we reviewed often acknowledged that agencies had made some progress in the areas of recruitment, hiring, and promotion of EEO groups, none included any explanation of the fundamental causes of underrepresentation where it existed.

The State Department initiated studies to validate its procedures for examining and hiring Foreign Service employees partly in response to our 1989 report.³ Our report recommended, among other things, that the Secretary of State analyze personnel processes to determine (1) whether the Foreign Service written examination was a valid predictor of success, (2) why minorities and women were eliminated at a higher rate than white men by the final review panel process, and (3) why women and minorities were disparately assigned to certain functional work areas.

²Federal Affirmative Action: Better EEOC Guidance and Agency Analysis of Underrepresentation Needed (GAO/GGD-91-86, May 1991); Federal Affirmative Employment: Status of Women and Minority Representation in the Federal Workforce (GAO/T-GGD-92-2, Oct. 23, 1991).

³State Department: Minorities and Women Are Underrepresented in the Foreign Service (GAO/NSIAD-89-146, Jun. 1989).

The State Department has taken steps to address these first two recommendations. State's multiyear plan acknowledged that the Foreign Service written exam had adversely affected EEO groups. According to the Director, Office of Recruitment, Examination, and Employment, the State Department is validating the requirements of Foreign Service positions and correlating them with the test used to determine whether revisions are needed. The Director said that the Uniform Guidelines on Employee Selection Procedures do not require that the agency automatically discard or change the exam; they only require that State determine whether the exam is a valid indicator of job performance.⁴ According to State officials, they have implemented, in 1994, a new system for assigning functional work areas which addresses the allegations of disproportionate assignment of women and minorities to certain areas.

The affirmative employment plans we reviewed generally acknowledged that the agencies lacked information on employee skills and training. With the exception of the State Department, the plans did not say whether or not procedures were in place to ensure appropriate training opportunities were available to all employees. For example, the State Department's multiyear affirmative employment plan stated that the agency lacked sufficient managerial and supervisory emphasis on the use of career training and employee development counseling opportunities. State's plan also said that some supervisors do not have enough time to provide adequate career counseling due to performance of regular duties and many supervisors and employees were unaware of career ladders and the training needed to encourage upward movement. State's plan listed specific actions to address these barriers, such as establishing mandatory EEO/supervisory training for supervisory personnel and a mentor program to provide additional career development information.

Navy's multiyear affirmative employment plan acknowledged the underrepresentation of women and minorities in engineering positions and cited that insufficient numbers are applying, but offered no explanation on the root causes of this problem. The agencies' plans that we reviewed acknowledged the lack of data and analyses to identify barriers to promotion or entry into senior management positions. Finally, the agencies' plans contained little if any discussion of the reasons employees separated from the agencies and whether institutional policies affected the retention of women and minorities.

⁴The Uniform Guidelines were adopted by the Civil Service Commission (now OPM), the Department of Justice, the Department of Labor, the Department of the Treasury, and EEOC in 1978. The Uniform Guidelines require federal agencies to analyze whether personnel testing and selection procedures for hiring, job assignments, promotions, training, and separations adversely affect EEO groups.

The section labelled "barriers" in the agencies' plans dealt primarily with administrative program management issues, such as the need to provide managers with EEO awareness training and the need for EEO data collection and evaluation systems. While these are important aspects of the affirmative employment program, none of the multiyear plans focused on the root causes of underrepresentation or the specific remedies required to correct the problem. Agency personnel and EEO specialists at three of the four agencies we reviewed told us that the affirmative employment plans were deficient because they were treated as a paperwork requirement instead of as plans of action to be taken seriously by the agencies' managers. Officials at the other agency we reviewed attributed the multiyear plan's limitations mainly to data limitations.

While the multiyear plans offered little information on the underlying causes of underrepresentation, our interviews with senior managers and EEO and personnel staff at the four agencies disclosed a number of barriers they said limited representative employment. At the Departments of the Interior, Agriculture, and Navy, these included:

- senior managers' apathy to their units' affirmative employment goals and objectives;
- selecting officials' stereotyped thinking (e.g., the beliefs that women do not want to travel on their jobs or cannot meet the physical work requirements of traditionally "men only" jobs); and
- absence of penalties for managers and supervisors who fail to maintain an environment free of discrimination.

EEOC identified similar barriers and negative attitudes towards women and minorities in its 1990 on-site reviews of Interior's and Navy's affirmative employment programs. For example, EEOC's report cited an interview with one senior manager who said that "minorities are not willing to reinvest their time and money into their careers." This manager also said that "whites have the credentials and are more qualified than the minority applicants."

Regarding barriers to the entry of women and minorities into the Foreign Service, the former Director of the Office of Recruitment, Examination, and Employment at the State Department told us that women and minorities generally had not considered the Foreign Service as a career option early in their school training and thus frequently had not pursued the academic curriculum necessary to successfully complete the Foreign Service examination. This official said that the State Department was

trying to address this barrier by providing more information to applicants on how to prepare for the Foreign Service exam. The State Department—which until recently had not extensively recruited women and minorities at the college level—also recognizes the need to increase recruiting efforts.

Numerical Goals Not Linked to Specific Underrepresentation Problems

While the establishment of numerical goals as an aid for achieving full representation is discretionary under MD-714, EEOC officials have said that such goal setting is one of a number of valuable management tools and a reflection of management's commitment to overcoming underrepresentation. Goal setting also provides measurable objectives for managers when recruiting, hiring, and promoting staff. MD-714 states that numerical goals, when used, should have a reasonable relation to the extent of underrepresentation in the agencies' workforces, the number of vacancies, and the availability of candidates.

Three of the four agencies we reviewed established numerical goals in their multiyear affirmative employment plans as a means of improving the representation of women and minorities in their workforces. The Department of the Interior did not do so, although some of its agencies, such as the Fish and Wildlife Service, did establish numerical goals.

The numerical goals that Agriculture and Navy established may have been misdirected because they were not based on the degree of underrepresentation of EEO groups in job categories and major occupations as MD-714 provides. For example, EEOC noted that Agriculture had set overall goals for women or minorities rather than for the specific EEO groups that were underrepresented. EEOC also found that Agriculture set numerical goals in occupational series that had no representation problems. In contrast, Agriculture established no numerical goals for certain EEO groups (e.g., Hispanics) that its affirmative employment plan identified as being severely underrepresented.

Navy identified severe underrepresentation of women and minorities in science and engineering positions in its 1988 multiyear plan, but did not establish specific goals for increasing the number of women and minorities in these occupations until fiscal year 1993. Furthermore, while Navy's 1988 multiyear plan established a departmentwide goal of increasing the employment of Hispanics by 5 percent, it did not outline specific actions needed to achieve this goal also until fiscal year 1993.

In its 1990 report of Navy's program, EEOC stated that it found no evidence that Navy was aggressively recruiting Hispanics. EEOC also said that Navy's goal for increasing Hispanic representation was below the Hispanic representation in the CLF. Navy's fiscal year 1992 accomplishment report and 1993 affirmative employment update indicate that Navy is beginning to plan activities to recruit and employ Hispanics (e.g., increased participation of Hispanics in cooperative programs and Junior Fellowship programs).

The State Department has established numerical hiring goals for EEO groups in its Foreign Service and Civil Service. However, its multiyear plan did not include goals for the advancement of women and minorities into senior-level positions.

Data Deficiencies Hampered Agencies' Program and Barrier Analyses

Adequate, reliable data with which to identify EEO problems and their causes are clearly essential to building affirmative employment plans. The agencies we reviewed were unable to adequately analyze the barriers to the representative employment of women and minorities because for the most part they lacked the requisite data on recruitment, hiring, training, job assignments, promotions, and separations.

Recruitment data, or applicant flow data as they are commonly known, refer to the gender, race, and ethnic origin of job applicants.⁵ None of the agencies we reviewed gathered applicant flow data on an agencywide basis. Applicant flow data are needed to determine whether an agency's recruiting efforts are generating sufficient numbers of women and minority applicants. Hiring data accounts for the number of persons selected for the positions available.

Agency officials said they lacked the data partly because they are unclear about EEOC's requirements for collecting and analyzing personnel event data. We found that while the Uniform Guidelines require that agencies maintain data on recruitment, hiring, training and development, job assignments, promotions, and separations, MD-714 does not require that these data be collected, analyzed, and reported in the affirmative employment plans.

Recognizing the importance of recruitment, hiring, promotion, and separations data, EEOC is revising its affirmative employment planning

⁵Agencies can request that applicants provide this information on a voluntary basis.

instructions to require agencies to collect, analyze, and report this information in the next affirmative employment planning cycle.

Agencies also face practical difficulties in obtaining personnel event data. For example, EEO and personnel specialists we interviewed generally said that they lacked the computer capability to gather and analyze agencywide data on applicant flow, training, employee development, and separations. Developing the computer capability is an issue of priority that each agency has to examine itself since it takes time and money.

Collecting applicant flow data has been a problem because agencies must get approval from appropriate sources for the use of a form designed to collect such data. As discussed in our October 1991 testimony,⁶ agencies no longer have a governmentwide form for gathering applicant flow data because OPM's authorization for the use of a form specifically designed for that purpose expired in December 1983. In 1989, EEOC proposed a directive that would have required agencies to collect the data, but, at OPM's request, did not issue the proposed directive. OPM made the request because at that time it was considering collecting these data governmentwide as part of its new effort to automate its hiring process. We recommended in October 1991 that OPM act in cooperation with EEOC to examine options for collecting and analyzing applicant flow data and take prompt appropriate action.

In August 1994, an OPM official from the Office of the Director told us that OPM was still discussing with EEOC the alternatives for collecting the data. OPM also told us that it has discussed with EEOC the costs of developing an applicant flow system and that OPM will not proceed without EEOC's support. However, in June 1995, the Director, OPM, stated that the agency was opposed to collecting applicant flow data because collecting this data is burdensome, ineffective, and costly. OPM also stated that agencies should be held accountable for their selections and not be allowed to use the composition of applicant pools as an excuse to deflect accountability from deciding officials.

In July 1995, the Chairman, EEOC, disagreed with the Director of OPM's views about the need for and collection of applicant flow data. The Chairman said that collection of applicant flow data is necessary to hold agency officials accountable. He also said collection of applicant flow data

⁶Federal Affirmative Employment: Status of Women and Minority Representation in the Federal Workforce (GAO/T-92-2, Oct. 23, 1991).

is required by regulation that is binding on both public and private sector employees.

While EEOC's draft revised management directive requires agencies to collect applicant flow data, EEOC still has not developed procedural guidance for collecting the data. If agencies continue to face difficulties in getting approval for the use of a form to collect applicant flow data, they may not be able to comply with EEOC's proposed directive.

Limited Senior Management Involvement in Plan Development

MD-714 provides that a management team consisting of line management officials, EEO staff, personnel staff, and heads of other pertinent offices should meet to review and identify the agency policies, practices, and procedures that cause underrepresentation problems. However, the personnel and EEO officials and line managers we talked to said that their agencies' affirmative employment multiyear plans and annual updates were prepared by personnel and/or EEO office staff at the departmental level with little or no input from line managers and senior officials.⁷ According to the officials we interviewed, line managers and senior officials with authority to make personnel decisions regarding employment, job assignments, training, promotions, and terminations were rarely involved in the process of identifying barriers and actions to improve the representation of women and minorities in their agencies. The agency officials we talked to also said that line managers and senior officials' involvement, when it occurred, was limited to providing data or cursory review of draft plans prepared by the EEO or personnel staff offices.

Our review of the agencies' affirmative employment multiyear plans showed that senior officials and managers were not made responsible for implementing planned affirmative employment actions. For example, Interior's multiyear affirmative employment plan assigned the responsibility for implementing the action items identified in the plan to the Offices of Equal Opportunity and/or Personnel. Senior officials, line managers, and supervisors were given no affirmative action tasks to carry out.

EEO staff we talked to at Interior, Agriculture, and Navy characterized the affirmative employment plans as "administrative tasks" or "paper exercises" done to fulfill EEOC's requirement that agencies submit a plan.

⁷EEO and/or personnel staff at the departmental level usually consolidated plans submitted to them by component agencies. In general, the component plans were also prepared by EEO and/or personnel staff.

They said that senior officials and line managers did not actively participate in preparing the plans. Navy and Interior EEO officials told us that senior officials and line managers in their agencies did not see affirmative employment as one of their key responsibilities because they were not held accountable for planning and carrying out affirmative action.

Agency Heads' Accountability for Achieving a Representative Workforce

Agency heads have been required for many years, by law and regulation, to establish programs to end discrimination and to promote affirmative employment. Accountability suggests that goals will be established, performance will be measured and reported, and that this information in turn will be used to monitor progress towards achieving the agencies' EEO objectives. However, at present no formal mechanisms are in place to evaluate agency heads on the results of their agencies' EEO/affirmative employment programs.

The National Performance Review (NPR) recognized a need to hold federal top managers accountable for EEO/affirmative employment program outcomes and identified ways to address these needs. Specifically, the NPR called for charging "all federal agency heads with the responsibility for ensuring equal opportunity and increasing representation of qualified women, minorities, and persons with disabilities into all levels and job categories, including middle and senior management positions."⁸ The NPR recommended, among other things, that the President mandate through an Executive Order that each agency head build EEO and affirmative employment elements "into the agency's strategic business plan and include effective measurements for impact and change."⁹ A draft of the Executive Order aimed at addressing this recommendation was under review in August 1995.

Federal agencies may or may not have formal organizational strategic plans. However, the Government Performance and Results Act (GPRA) of 1993 requires that by September 30, 1997, the head of each agency submit to the Director, Office of Management and Budget (OMB) and to Congress a strategic plan containing a statement of goals and objectives, including outcome-related goals for the agency's major functions and operations. The plan should also contain a description of the program evaluations

⁸From Red Tape to Results: Creating a Government that Works Better and Costs Less. Report of the National Performance Review, Sept. 7, 1993.

⁹Accompanying Reports of the National Performance Review, September 1993.

used in establishing or revising general goals and objectives.¹⁰ This long-term strategic plan provides a framework for integrating human resources management issues—of which EEO and affirmative employment are a part—into the agencies' organizational plans and strategies. It provides the basis for holding agency heads accountable for human resource management effectiveness.

It is unknown how the current reexamination of federal affirmative action programs will affect the administration's plans for holding agency heads accountable for results in EEO/affirmative employment programs.

Conclusions

The multiyear affirmative employment planning program analyses we reviewed did not adhere to all of EEOC's instructions. The planning analysis did not fully analyze program elements such as recruitment and hiring, promotions, employee development, and separations.

Agency officials told us they did not collect personnel event data and analyze it as part of the process of identifying barriers to EEO, in part because they did not consider this to be a planning requirement. EEOC has not clearly stated what data and analyses the multiyear plans should contain and focused agencies' attention on identifying the causes of underrepresentation problems. We have made a number of recommendations to EEOC in past reports for improving the guidance it provides to agencies. EEOC's proposed management directive incorporates many of our past recommendations and, if implemented, would clarify agency affirmative employment responsibilities.

Finally, the agency EEO officials we talked to said that senior officials and senior managers had little involvement in formulating their agencies' multiyear affirmative employment plans and annual updates. Our review of these plans showed that the plans assigned them no specific affirmative employment responsibilities. Management participation in multiyear plan development and execution is a part of the affirmative employment planning process outlined in MD-714.

¹⁰GPRA also requires agencies to prepare annual performance plans beginning with fiscal year 1999 and performance reports on the previous year's performance beginning March 2000. To this end, the act requires agencies to establish performance indicators for measuring relevant outputs, services, and outcomes of each program and to compare the actual program results with the established performance goals. GPRA requires that at least 10 agencies participate in pilot projects during fiscal years 1994, 1995, and 1996. As of January 31, 1994, 52 pilot projects for performance plans and performance reports had been designated in 21 departments and agencies. One of these departments (Agriculture) submitted a pilot performance plan covering the representation of EEO groups.

While agency heads are responsible by law for implementing programs to eliminate the underrepresentation of women and minorities in the workforce, no formal mechanism is currently in place to hold them directly accountable for the success of those programs. The strategic plans required by GPRA provide a framework for integrating human resources management with agency business plans and strategies. These plans provide a vehicle for including affirmative goals and objectives in organizational plans and ultimately holding top managers accountable for EEO results. However, the strategic plans are not required until 1997. One way being considered to expedite this process is through the NPR recommendation that the President mandate through an Executive Order that each agency head build EEO and affirmative employment elements into his or her agency's strategic business plans.

It is unknown how the current reexamination of federal affirmative action programs will affect the administration's plans for holding agency heads accountable for results in EEO/affirmative employment programs.

OPM and EEOC Oversight of Agencies' Affirmative Recruitment and Employment Program Performance

OPM and EEOC did not provide sufficient oversight to ensure that agencies' affirmative recruitment and employment programs were effectively correcting imbalances in their workforces. We found, for example, that OPM did not apply all the requirements set forth in regulations when reviewing FEORP plans. Moreover, while OPM increased the number of its on-site reviews in fiscal year 1993, these reviews provided only limited information on the success of agencies' recruitment efforts. While EEOC's on-site reviews addressed substantive issues, these reviews, prior to June 1993, were limited in number. According to EEOC officials, they revised their evaluation approach as of June 1993 to increase their frequency and number.

OPM Review of Agencies' FEORP Plans

5 CFR 720.205 requires that an agency's FEORP plan include: (1) annual determinations of underrepresented EEO groups and indexes for measuring progress in eliminating underrepresentation; (2) listings of occupational categories suitable for external and internal recruitment; (3) descriptions of recruitment programs established to increase women and minority candidates from internal and external sources; (4) descriptions of methods the agency intends to use to identify and develop women and minority candidates from each underrepresented group; (5) an indication of how these methods differ from and expand upon prior agency efforts; (6) the expected number of job vacancies to be filled in the current year and future years by grade or job category; (7) identification of knowledge, skills, and abilities that can be obtained at lower grade levels in the same or similar occupational series to prepare candidates from underrepresented EEO groups for higher job progression; (8) descriptions of planned efforts to identify jobs that can be redesigned to improve opportunities for women and minorities; and (9) priority listings for special recruitment activities.

OPM did not use all of these requirements when reviewing agency affirmative recruitment plans. Officials from OPM's former Office of Recruitment and Employment told us OPM considered a plan to be adequate if it (1) identified recruitment priorities by targeted groups, grade levels, and occupations; (2) described recruitment methods and sources; and (3) provided target dates for accomplishing recruitment activities. According to these officials, this information, along with the agencies' accomplishment reports and OPM trend data on agencies' employment profile, is sufficient for them to evaluate agencies' FEORP activities.

We reviewed the yearly FEORP plans prepared by Interior, Agriculture, Navy, and State for fiscal years 1991 through 1993. These plans generally lacked information required in CFR 720.205. Specifically, the plans did not address items 5 through 8 listed above. These requirements were developed because they would contribute to a strong affirmative recruitment program.

OPM Has Increased Its On-Site Review Activity but Its Reviews Have Not Addressed Program Effectiveness

OPM increased its on-site FEORP program evaluations from an average of 5 on-site reviews per year over fiscal years 1989-1992 to 27 on-site reviews in fiscal year 1993, reaching its goal of reviewing at least one-third of the agencies covered by FEORP. According to OPM officials, the on-site reviews were not designed to set expectations or evaluate an agency's progress in terms of recruiting numbers. Rather, their purpose was to provide agencies with information about OPM activities, answer questions, and suggest ways of improving the agencies' affirmative recruitment programs. OPM officials said that OPM has used a "non-threatening" approach to administering the FEORP program. OPM officials stressed that EEOC bears the primary oversight responsibility for affirmative recruitment and employment and that OPM's primary role is to provide technical assistance to help agencies develop innovative programs that will correct imbalances in their workforces.

In 1990, at the request of the Office of Affirmative Recruiting and Employment, OPM's Office of Agency Compliance and Evaluation (ACE) reviewed the FEORP program. ACE's review covered agency FEORP activities at 185 major installations employing about 316,000 civilian employees.¹ ACE's review findings were similar to those included in the on-site reviews performed by the Office of Affirmative Recruiting and Employment—namely, that agencies were involved in a variety of efforts to increase the identification and outreach of women and minorities. However, ACE's review also revealed that half of the installations-level personnel at these agencies were not familiar with their agencies' FEORP plans and that installation personnel did not see connections between FEORP plans and affirmative employment program plans.²

¹ACE was responsible for assessing the federal government's effectiveness in personnel management and ensuring that agencies were in compliance with personnel laws and regulations. In January 1995, it was reduced and merged with other oversight activities into the Office of Merit Systems Oversight and Effectiveness.

²FEORP was one of seven issues that ACE examined in its fiscal year 1990 governmentwide personnel management reviews. According to ACE officials, prior to fiscal year 1989, ACE conducted very limited process reviews of agency/installation FEORP programs. Reports for those years would only mention FEORP if problems were found.

One of OPM's functions under FEORP is to help increase the number of women and minorities in applicant pools, at all grade levels. In principle, increased representation of women and minorities in applicant pools should eventually result in more hiring from these groups. However, OPM evaluations have not specifically examined the extent to which agency recruitment efforts have indeed increased the number of women and minorities in their applicant pools. OPM is responsible (under 5 CFR 720.203) for assisting agencies in determining whether applicant pools used in filling jobs in a category of employment where underrepresentation exists include sufficient candidates from any underrepresented groups. As discussed in chapter 3, neither the agencies nor OPM collect applicant pool data. Without these data, agencies and OPM cannot measure the effectiveness of affirmative recruitment efforts.

EEOC On-Site Reviews of Agency Affirmative Employment Programs

According to officials in EEOC's Office of Federal Operations, EEOC is responsible for overseeing about 121 federal agencies and more than 900 field installations. EEOC's standard operating procedures for conducting on-site reviews, issued in 1990, stated that EEOC would target 23 agencies for review during the multiyear planning cycle, and the remaining agencies on a case-by-case basis.³ EEOC had completed 14 of the scheduled 23 on-site reviews between 1988 and June 1993.

EEOC officials from the Office of Federal Sector Programs said EEOC had revised the scoping approach and, if its budget allowed, would be able to do more reviews each year. Subsequently, EEOC officials informed us that as of June 1995, the agency had completed 36 more on-site reviews. The officials explained that, while considerable staff resources and time were used in the past to examine a relatively small number of large complex departments such as Navy and Interior, EEOC's revised approach focuses on components of large departments and small agencies. EEOC expects to reach a 60-day goal for completing an on-site review which, if achieved, would allow for more reviews in a given year. EEOC officials also said that with additional experience in conducting on-site reviews, EEOC will more likely schedule large and complex agencies for review.

The Director of Affirmative Employment, Federal Programs, also said that his staff spends most of its time reviewing annual updates and

³According to the procedures, EEOC would select agencies for review based on factors such as workforce changes, underrepresentation of women and minorities, discrimination complaint activity, status of affirmative employment plans, historical record of noncompliance with EEOC regulations, agency requests, and/or EEOC's field personnel suggestions.

accomplishment reports and providing written responses to the agencies, and less time on evaluating the effectiveness of the programs.

EEOC, like other agencies, has faced the challenge of meeting expanded oversight responsibilities with limited staff resources. At the end of fiscal year 1993, EEOC had 36 employees monitoring the affirmative employment programs of 121 agencies and 900 field offices. EEOC officials from the Office of Federal Sector Programs said that their staffing levels have remained virtually unchanged since 1988.

EEOC's on-site reviews have addressed significant program issues. In addition to analyzing the changes in the employment and advancement of women and minorities, EEOC examined agency management support and accountability; program guidance, coordination, and monitoring; and agency practices. As a result, EEOC's on-site reports contained numerous and significant recommendations. For example, EEOC's report on the Department of the Interior's affirmative employment program contained 43 specific recommendations for improvements in almost all aspects of Interior's program. EEOC recommended, among other things, that Interior set specific objectives to address the underrepresentation of EEO groups, establish time frames for accomplishing objectives, and hold responsible officials accountable for their implementation.

EEOC's report on Navy's program recommended that Navy address the underrepresentation of women and minorities in its SES and upper grade levels; evaluate its Merit Promotion Program for adverse impact on women, minorities, and people with disabilities; establish uniform EEO performance standards for managers and supervisors, including civilian affirmative employment and EEO responsibilities in military evaluation reports; and accelerate the separations analysis needed to address the high rate at which minorities and women are separated from Navy. Navy agreed to implement all of EEOC's recommendations.

EEOC generally followed the criteria it developed for evaluating the agencies' programs. The criteria, as stated in MD-714, consists of evaluating an agency affirmative employment program on the basis of positive changes in the participation of EEO groups in the work force; successful hiring and internal movement activity; successful completion of the affirmative employment action plan; completeness and accuracy of required information; and effectiveness of the agency's internal monitoring and evaluation system.

Conclusions

Oversight of affirmative recruitment and employment programs helps to (1) ensure that agencies are taking the necessary steps to eliminate the underrepresentation of women and minorities as required by law, and (2) provide these agencies with meaningful feedback and assistance on how to improve their programs.

We found that in reviewing agencies' FEORP plans, OPM does not require agencies to follow all the requirements set forth in regulations. And, while OPM increased the number of its on-site reviews in fiscal year 1993, its reviews have not fully addressed the success of agencies' recruitment efforts. Determining the effect of the recruitment program will require that OPM assist agencies in collecting and analyzing recruitment data. In October 1991, we recommended that OPM act in coordination with EEOC to examine options for collecting and analyzing applicant flow data and take prompt appropriate action.

EEOC's on-site reviews have addressed significant program issues but have been limited in number. As a result, many agencies were not getting critical information on how to improve their programs. EEOC has since increased the number of reviews, adding 36 reviews since June 1993.

Agency Comments and Our Evaluation

In a letter dated June 14, 1995, the Deputy Assistant Secretary of Defense (Equal Opportunity) concurred with our findings and conclusions and provided updated information on the Navy's affirmative employment efforts (see app. III). In a letter dated June 5, 1995, the Director of Interior's Office of Equal Opportunity said that our analysis was useful and provided additional updated information (see app. IV). The Director of OPM, in a letter dated June 20, 1995, said that our report underscores the findings of the National Performance Review that there is duplication between the requirements and oversight roles of OPM and EEOC and that current requirements place too much emphasis on process rather than results (see app V).

The Department of State's Director of EEO and a personnel specialist from the Department of Agriculture's Office of Personnel provided oral comments on a draft of this report in July 1995 meetings. Both provided technical suggestions that we have incorporated, where appropriate.

In a letter dated July 7, 1995, the Chairman, EEOC, disagreed with our assertions that (1) federal agencies had not followed EEOC's instructions in their analyses of affirmative employment programs and had submitted

incomplete plans, and (2) EEOC had approved the incomplete plans, thereby indicating that EEOC was not providing the oversight necessary to ensure that the proper affirmative action program analyses were being done (see app. VI).

In support of its position, EEOC articulated an interpretation of MD-714's reporting requirements that was different from the one we had been provided by EEOC officials during the course of past reviews. According to the interpretation EEOC articulated in its comments, MD-714 provides agencies leeway in determining which program elements to report in their plans. Under this interpretation, we agree that the plans that our draft report had characterized as incomplete could instead be viewed as complete. We have revised the report to reflect this interpretation and to incorporate additional technical suggestions, as appropriate.

A more important issue than the completeness of the plans is the underlying analyses upon which the plans are based. In its comments, EEOC said that the program analysis questions in MD-714 are also considered as guidance and not specific requirements. However, EEOC's January 21, 1988, memorandum to federal agencies on affirmative employment planning says otherwise. The memorandum states that "The program analysis is the foundation upon which the agency's entire plan will be based. Therefore, each agency should ensure that it performs a comprehensive assessment of how the agencies' efforts are directed toward the eight major program elements. The analysis must provide complete rationale for responses to the questions that follow each element. It is not necessary that the analysis be limited to just those questions." The memorandum also states that agencies should maintain documentation which supports the agency's identification of barriers and development of objectives.

Thus, while agencies need not report on all eight program elements in their plans, current MD-714 guidance requires that agencies use those elements in their analyses and maintain supporting documentation. Because reports may not include all of the relevant information, it is important for EEOC to perform on-site reviews which include evaluations of agencies' program analyses. We believe that, as discussed in Chapter 4, EEOC's increased rate of completed on-site reviews, if continued and done effectively, should help provide the necessary oversight for agency affirmative employment programs.

On the issue of collecting data on job applicants, OPM's and EEOC's comments reflect different points of view. OPM said that it is opposed to collecting data from job applicants concerning their race and national origin because it believes that the collection of such data would be costly, ineffective, and a reporting burden. OPM also said that agencies should be held accountable for the compositions of their selections. In contrast, EEOC said that it believes the collection of applicant flow data is necessary to hold agency officials accountable and is also required by regulation. We have previously found that agencies frequently believed applicant flow data was useful and recommended reestablishing collection of that data.

Tables Showing Representation Levels and Progress Made by Specific EEO Groups at Four Agencies

The tables in this appendix parallel those provided in chapter 2 and supplement the information provided in that chapter by disaggregating the minority men and women into specific minority groups (i.e., black men and women, Hispanic men and women, Asian men and women, and Native American men and women). The following notes are provided to assist readers in understanding the tables in this appendix.

In tables I.1 through I.8, percentages were calculated, in both fiscal years 1984 and 1992, by dividing the number of workers in each EEO group by the total workforce, or in the segment of that workforce being considered, and multiplying the result by 100. Relative numbers were calculated in both years by dividing the number of workers in each protected EEO group by the number of white men, and multiplying the result by 100. The relative numbers indicate, in each year, how many white women, black men, black women, etc., there were for every 100 white men. Changes in percentages and relative numbers were obtained by dividing the percentages and relative numbers in 1992 by the percentages or relative numbers in 1984. A ratio of 1.0 indicates no change in percentage or relative number; ratios greater than 1.0 indicate an increase in percentages or relative numbers, while numbers less than 1.0 indicate a decrease.

In table I.9, representation indexes were computed by dividing the percentage in each EEO group in each of the four agencies by the corresponding percentage in each EEO group in the CLF. Index values that equal or exceed 100 indicate that the EEO group is fully represented, while index values less than 100 indicate that the EEO group is underrepresented in the agency relative to the CLF.

Appendix I
Tables Showing Representation Levels and
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Tables II.1 through II.4 compare percentages and relative numbers in the different EEO groups who were hired in the different agencies in fiscal years 1984 and 1992, who separated from those agencies, and who were promoted in both years, to the percentages who were employed in those agencies.¹ Percentages and relative numbers were calculated as in previous tables. Percentages and relative numbers of hires in an agency that are lower than the corresponding percentages and relative numbers employed in a given year indicate potentially troublesome entry levels, from an affirmative employment perspective. The same is true of lower percentages and relative numbers promoted, and higher percentages and relative numbers separating from a given agency in a given year.

¹The number of hires refers to the number of employees who entered the agencies at any point during fiscal years 1984 and 1992. As discussed in app. II, the data on hires presented in this report included both appointments and conversions. The numbers employed refer to the number of employees on-board in the agencies at the end of fiscal years 1984 and 1992.

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Table I.1: Numbers, Percentages, and Relative Numbers of Specific EEO Groups at the Department of the Interior in Fiscal Years 1984 and 1992

Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Total workforce									
White men	32,935	31,693	-1,242	56.17	51.11	0.91			
White women	13,187	16,005	2,818	22.49	25.81	1.15	40.04	50.50	1.26
Black men	1,879	1,825	-54	3.20	2.94	0.92	5.71	5.76	1.01
Black women	1,618	1,970	352	2.76	3.18	1.15	4.91	6.22	1.27
Hispanic men	1,255	1,540	285	2.14	2.48	1.16	3.81	4.86	1.28
Hispanic women	811	1,191	380	1.38	1.92	1.39	2.46	3.76	1.53
Asian men	465	496	31	0.79	0.80	1.01	1.41	1.57	1.11
Asian women	280	384	104	0.48	0.62	1.29	0.85	1.21	1.42
Native American men	3,740	3,788	48	6.38	6.11	0.96	11.36	11.95	1.05
Native American women	2,465	3,115	650	4.20	5.02	1.20	7.48	9.83	1.31
Total^a	58,635	62,007		99.99	99.99				
White-collar workforce									
White men	26,782	27,182	400	54.76	49.38	0.90			
White women	12,474	15,830	3,356	25.50	28.76	1.13	46.58	58.24	1.25
Black men	1,053	1,175	122	2.15	2.13	0.99	3.93	4.32	1.10
Black women	1,489	1,936	447	3.04	3.52	1.16	5.56	7.12	1.28
Hispanic men	935	1,132	197	1.91	2.06	1.08	3.49	4.16	1.19
Hispanic women	781	1,179	398	1.60	2.14	1.34	2.92	4.34	1.49
Asian men	391	455	64	0.80	0.83	1.04	1.46	1.67	1.14
Asian women	263	383	120	0.54	0.70	1.30	0.98	1.41	1.44
Native American men	2,356	2,706	350	4.82	4.92	1.02	8.80	9.96	1.13
Native American women	2,388	3,071	683	4.88	5.58	1.14	8.92	11.30	1.27
Total^a	48,912	55,049		100.00	100.02				
Blue-collar workforce									
White men	5,003	4,507	-496	64.76	64.82	1.00			
White women	110	175	65	1.42	2.52	1.77	2.20	3.88	1.76
Black men	776	650	-126	10.04	9.35	0.93	15.51	14.42	0.93
Black women	55	34	-21	0.71	0.49	0.69	1.10	0.75	0.68
Hispanic men	290	407	117	3.75	5.85	1.56	5.80	9.03	1.56
Hispanic women	3	12	9	0.04	0.17	4.25	0.06	0.27	4.50

(continued)

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Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Asian men	50	41	-9	0.65	0.59	0.91	1.00	0.91	0.91
Asian women	0	1	1	0.00	0.01	^b	0.00	0.02	^b
Native American men	1,373	1,082	-291	17.77	15.56	0.88	27.44	24.01	0.88
Native American women	66	44	-22	0.85	0.63	0.74	1.32	0.98	0.74
Total	7,726	6,953		99.99	99.99				
Key job workforce									
White men	13,296	14,285	989	76.09	68.46	0.90			
White women	1,965	3,676	1,711	11.25	17.62	1.57	14.78	25.73	1.74
Black men	271	356	85	1.55	1.71	1.10	2.04	2.49	1.22
Black women	129	223	94	0.74	1.07	1.45	0.97	1.56	1.61
Hispanic men	433	556	123	2.48	2.66	1.07	3.26	3.89	1.19
Hispanic women	57	163	106	0.33	0.78	2.36	0.43	1.14	2.65
Asian men	180	204	24	1.03	0.98	0.95	1.35	1.43	1.06
Asian women	50	99	49	0.29	0.47	1.62	0.38	0.69	1.82
Native American men	745	882	137	4.26	4.23	0.99	5.60	6.17	1.10
Native American women	347	422	75	1.99	2.02	1.02	2.61	2.95	1.13
Total^a	17,473	20,866		100.01	100.00				
Nonkey job workforce									
White men	13,486	12,897	-589	42.90	37.73	0.88			
White women	10,509	12,154	1,645	33.43	35.56	1.06	77.93	94.24	1.21
Black men	782	819	37	2.49	2.40	0.96	5.80	6.35	1.09
Black women	1,360	1,713	353	4.33	5.01	1.16	10.08	13.28	1.32
Hispanic men	502	576	74	1.60	1.69	1.06	3.72	4.47	1.20
Hispanic women	724	1,016	292	2.30	2.97	1.29	5.37	7.88	1.47
Asian men	211	251	40	0.67	0.73	1.09	1.56	1.95	1.25
Asian women	213	284	71	0.68	0.83	1.22	1.58	2.20	1.39
Native American men	1,611	1,824	213	5.12	5.34	1.04	11.95	14.14	1.18
Native American women	2,041	2,649	608	6.49	7.75	1.19	15.13	20.54	1.36
Total^a	31,439	34,183		100.01	100.01				

^aPercentages may not add to 100 due to rounding.

^bThe amount of change (increase or decrease) cannot be computed because there was no one (0.00) in that EEO group at that grade level in the base year (1984).

Source: OPM's CPDF.

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Tables Showing Representation Levels and
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Table I.2: Numbers, Percentages, and Relative Numbers of Specific EEO Groups at the Department of Agriculture in Fiscal Years 1984 and 1992

Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Total workforce									
White men	57,209	48,992	-8,217	59.48	50.54	0.85			
White women	25,595	30,958	5,363	26.61	31.94	1.20	44.74	63.19	1.41
Black men	3,641	3,427	-214	3.79	3.54	0.93	6.36	7.00	1.10
Black women	3,948	5,370	1,422	4.11	5.54	1.35	6.90	10.96	1.59
Hispanic men	2,329	2,683	354	2.42	2.77	1.14	4.07	5.48	1.35
Hispanic women	991	1,662	671	1.03	1.71	1.66	1.73	3.39	1.96
Asian men	811	1,066	255	0.84	1.10	1.31	1.42	2.18	1.54
Asian women	404	736	332	0.42	0.76	1.81	0.71	1.50	2.11
Native American men	810	1,148	338	0.84	1.18	1.40	1.42	2.34	1.65
Native American women	437	890	453	0.45	0.92	2.04	0.76	1.82	2.39
Total^a	96,175	96,932		99.99	100.00				
White-collar workforce									
White men	55,017	47,643	-7,374	59.08	50.16	0.85			
White women	25,473	30,885	5,412	27.35	32.51	1.19	46.30	64.83	1.40
Black men	3,209	3,168	-41	3.45	3.34	0.97	5.83	6.65	1.14
Black women	3,895	5,340	1,445	4.18	5.62	1.34	7.08	11.21	1.58
Hispanic men	2,171	2,549	378	2.33	2.68	1.15	3.95	5.35	1.35
Hispanic women	988	1,657	669	1.06	1.74	1.64	1.80	3.48	1.93
Asian men	795	1,048	253	0.85	1.10	1.29	1.45	2.20	1.52
Asian women	403	736	333	0.43	0.77	1.79	0.73	1.54	2.11
Native American men	748	1,081	333	0.80	1.14	1.43	1.36	2.27	1.67
Native American women	430	883	453	0.46	0.93	2.02	0.78	1.85	2.37
Total^a	93,129	94,990		99.99	99.99				
Blue-collar workforce									
White men	2,143	1,348	-795	71.89	69.45	0.97			
White women	110	73	-37	3.69	3.76	1.02	5.13	5.42	1.06
Black men	431	259	-172	14.46	13.34	0.92	20.11	19.21	0.96
Black women	50	30	-20	1.68	1.55	0.92	2.33	2.23	0.96
Hispanic men	158	134	-24	5.30	6.90	1.30	7.37	9.94	1.35
Hispanic women	3	5	2	0.10	0.26	2.60	0.14	0.37	2.64

(continued)

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Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Asian men	16	18	2	0.54	0.93	1.72	0.75	1.34	1.79
Asian women	1	0	-1	0.03	0.00	0.00	0.05	0.00	0.00
Native American men	62	67	5	2.08	3.45	1.66	2.89	4.97	1.72
Native American women	7	7	0	0.23	0.36	1.57	0.33	0.52	1.58
Total^a	2,981	1,941		100.00	100.00				
Key job workforce									
White men	37,444	31,020	-6,424	73.43	60.62	0.83			
White women	7,968	12,700	4,732	15.62	24.82	1.59	21.28	40.94	1.92
Black men	1,848	1,803	-45	3.62	3.52	0.97	4.94	5.81	1.18
Black women	724	1,347	623	1.42	2.63	1.85	1.93	4.34	2.25
Hispanic men	1,427	1,644	217	2.80	3.21	1.15	3.81	5.30	1.39
Hispanic women	271	613	342	0.53	1.20	2.26	0.72	1.98	2.75
Asian men	529	684	155	1.04	1.34	1.29	1.41	2.21	1.57
Asian women	122	276	154	0.24	0.54	2.25	0.33	0.89	2.70
Native American men	547	771	224	1.07	1.51	1.41	1.46	2.49	1.71
Native American women	116	315	199	0.23	0.62	2.70	0.31	1.02	3.29
Total^a	50,996	51,173		100.00	100.01				
Nonkey job workforce									
White men	17,573	16,623	-950	41.71	37.94	0.91			
White women	17,505	18,185	680	41.55	41.50	1.00	99.61	109.40	1.10
Black men	1,361	1,365	4	3.23	3.12	0.97	7.74	8.21	1.06
Black women	3,171	3,993	822	7.53	9.11	1.21	18.04	24.02	1.33
Hispanic men	744	905	161	1.77	2.07	1.17	4.23	5.44	1.29
Hispanic women	717	1,044	327	1.70	2.38	1.40	4.08	6.28	1.54
Asian men	266	364	98	0.63	0.83	1.32	1.51	2.19	1.45
Asian women	281	460	179	0.67	1.05	1.57	1.60	2.77	1.73
Native American men	201	310	109	0.48	0.71	1.48	1.14	1.86	1.63
Native American women	314	568	254	0.75	1.30	1.73	1.79	3.42	1.91
Total^a	42,133	43,817		100.02	100.01				

^aPercentages may not add to 100 due to rounding.

Source: OPM's CPDF.

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Tables Showing Representation Levels and
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Table I.3: Numbers, Percentages, and Relative Numbers of Specific EEO Groups at the Department of the Navy in Fiscal Years 1984 and 1992

Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Total workforce									
White men	163,488	147,244	-16,244	56.43	52.19	0.92			
White women	55,903	58,732	2,829	19.30	20.82	1.08	34.19	39.89	1.17
Black men	27,010	22,004	-5,006	9.32	7.80	0.84	16.52	14.94	0.90
Black women	13,678	17,599	3,921	4.72	6.24	1.32	8.37	11.95	1.43
Hispanic men	7,380	7,252	-128	2.55	2.57	1.01	4.51	4.93	1.09
Hispanic women	2,047	3,466	1,419	0.71	1.23	1.73	1.25	2.35	1.88
Asian men	15,153	17,739	2,586	5.23	6.29	1.20	9.27	12.05	1.30
Asian women	3,704	6,111	2,407	1.28	2.17	1.70	2.27	4.15	1.83
Native American men	983	1,375	392	0.34	0.49	1.44	0.60	0.93	1.55
Native American women	359	635	276	0.12	0.23	1.92	0.22	0.43	1.95
Total^a	289,705	282,157	-7,548	100.00	100.03				
White-collar workforce									
White men	84,367	91,522	7,155	49.82	47.21	0.95			
White women	52,219	55,553	3,334	30.83	28.66	0.93	61.90	60.70	0.98
Black men	7,261	8,506	1,245	4.29	4.39	1.02	8.61	9.29	1.08
Black women	11,582	15,875	4,293	6.84	8.19	1.20	13.73	17.35	1.26
Hispanic men	2,467	3,565	1,098	1.46	1.84	1.26	2.92	3.90	1.34
Hispanic women	1,833	3,249	1,416	1.08	1.68	1.56	2.17	3.55	1.64
Asian men	5,606	8,616	3,010	3.31	4.44	1.34	6.64	9.41	1.42
Asian women	3,307	5,722	2,415	1.95	2.95	1.51	3.92	6.25	1.59
Native American men	391	666	275	0.23	0.34	1.48	0.46	0.73	1.59
Native American women	320	574	254	0.19	0.30	1.58	0.38	0.63	1.66
Total^a	169,353	193,848	24,495	100.00	100.00				
Blue-collar workforce									
White men	78,365	55,719	-22,646	65.78	63.10	0.96			
White women	3,646	3,178	-468	3.06	3.60	1.18	4.65	5.70	1.23
Black men	19,496	13,497	-5,999	16.37	15.28	0.93	24.88	24.22	0.97
Black women	2,067	1,724	-343	1.74	1.95	1.12	2.64	3.09	1.17
Hispanic men	4,875	3,686	-1,189	4.09	4.17	1.02	6.22	6.62	1.06
Hispanic women	212	217	5	0.18	0.25	1.39	0.27	0.39	1.44

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Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Asian men	9,453	9,123	-330	7.94	10.33	1.30	12.06	16.37	1.36
Asian women	393	389	-4	0.33	0.44	1.33	0.50	0.70	1.40
Native American men	585	709	124	0.49	0.80	1.63	0.75	1.27	1.69
Native American women	39	61	22	0.03	0.07	2.33	0.05	0.11	2.20
Total^a	119,131	88,303	-30,828	100.01	99.99				
Key job workforce									
White men	28,685	32,103	3,418	82.77	76.64	0.93			
White women	1,695	2,894	1,200	4.89	6.91	1.41	5.91	9.02	1.53
Black men	1,026	1,359	333	2.96	3.24	1.09	3.58	4.23	1.18
Black women	236	416	180	0.68	0.99	1.46	0.82	1.30	1.59
Hispanic men	651	1,073	422	1.88	2.56	1.36	2.27	3.34	1.47
Hispanic women	59	145	86	0.17	0.35	2.06	0.21	0.45	2.14
Asian men	2,063	3,257	1,194	5.95	7.78	1.31	7.19	10.15	1.41
Asian women	138	468	330	0.40	1.12	2.80	0.48	1.46	3.04
Native American men	93	151	58	0.27	0.36	1.33	0.32	0.47	1.47
Native American women	10	23	13	0.03	0.05	1.67	0.03	0.07	2.33
Total^a	34,656	41,889	7,233	100.00	100.00				
Nonkey job workforce									
White men	55,682	59,419	3,737	41.34	39.10	0.95			
White women	50,524	52,659	2,135	37.51	34.65	0.92	90.74	88.62	0.98
Black men	6,235	7,147	912	4.63	4.70	1.02	11.20	12.03	1.07
Black women	11,346	15,459	4,113	8.42	10.17	1.21	20.38	26.02	1.28
Hispanic men	1,816	2,492	676	1.35	1.64	1.21	3.26	4.19	1.29
Hispanic women	1,774	3,104	1,330	1.32	2.04	1.55	3.19	5.22	1.64
Asian men	3,543	5,359	1,816	2.63	3.53	1.34	6.36	9.02	1.42
Asian women	3,169	5,254	2,085	2.35	3.46	1.47	5.69	8.84	1.55
Native American men	298	515	217	0.22	0.34	1.55	0.54	0.87	1.61
Native American women	310	551	241	0.23	0.36	1.57	0.56	0.93	1.66
Total^a	134,697	151,959	17,262	100.00	99.99				

^aPercentages may not add to 100 due to rounding.

Source: OPM's CPDF.

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Table I.4: Numbers, Percentages, and Relative Numbers of Specific EEO Groups at the Department of State in Fiscal Years 1984 and 1992

Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Total workforce									
White men	6,673	5,786	-887	53.84	47.61	0.88			
White women	3,285	3,233	-52	26.50	26.60	1.00	49.23	55.88	1.14
Black men	669	673	4	5.40	5.54	1.03	10.03	11.63	1.16
Black women	1,088	1,628	540	8.78	13.40	1.53	16.30	28.14	1.73
Hispanic men	324	269	-55	2.61	2.21	0.85	4.86	4.65	0.96
Hispanic women	112	195	83	0.90	1.60	1.78	1.68	3.37	2.01
Asian men	109	148	39	0.88	1.22	1.39	1.63	2.56	1.57
Asian women	99	173	74	0.80	1.42	1.78	1.48	2.99	2.02
Native American men	23	25	2	0.19	0.21	1.11	0.34	0.43	1.26
Native American women	12	22	10	0.10	0.18	1.80	0.18	0.38	2.11
Total^a	12,394	12,152	-242	100.00	99.99				
White-collar workforce									
White men	1,056	1,366	310	26.80	26.50	0.99			
White women	1,406	1,553	147	35.68	30.13	0.84	133.14	113.69	0.85
Black men	343	401	58	8.70	7.78	0.89	32.48	29.36	0.90
Black women	927	1,467	540	23.52	28.46	1.21	87.78	107.39	1.22
Hispanic men	76	71	-5	1.93	1.38	0.72	7.20	5.20	0.72
Hispanic women	51	113	62	1.29	2.19	1.70	4.83	8.27	1.71
Asian men	28	61	33	0.71	1.18	1.66	2.65	4.47	1.69
Asian women	46	109	63	1.17	2.11	1.80	4.36	7.98	1.83
Native American men	4	4	0	0.10	0.08	0.80	0.38	0.29	0.76
Native American women	4	9	5	0.10	0.17	1.70	0.38	0.66	1.74
Total^a	3,941	5,154	1,213	100.00	99.98				

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Workforce	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Foreign service workforce									
White men	5,568	4,387	-1,181	67.68	63.67	0.94			
White women	1,872	1,678	-194	22.75	24.35	1.07	33.62	38.25	1.14
Black men	253	218	-35	3.08	3.16	1.03	4.54	4.97	1.09
Black women	147	149	2	1.79	2.16	1.21	2.64	3.40	1.29
Hispanic men	168	194	26	2.04	2.82	1.38	3.02	4.42	1.46
Hispanic women	59	79	20	0.72	1.15	1.60	1.06	1.80	1.70
Asian men	80	87	7	0.97	1.26	1.30	1.44	1.98	1.38
Asian women	53	64	11	0.64	0.93	1.45	0.95	1.46	1.54
Native American men	19	21	2	0.23	0.30	1.30	0.34	0.48	1.41
Native American women	8	13	5	0.10	0.19	1.90	0.14	0.30	2.14
Total^a	8,227	6,890	-1,337	100.00	99.99				

^aPercentages may not add to 100 due to rounding.

Source: OPM's CPDF.

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Table I.5: Numbers, Percentages, and Relative Numbers of Specific EEO Groups in Key White-Collar Jobs by Grade Levels at the Department of the Interior in Fiscal Years 1984 and 1992

Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Grades 1-10									
White men	3958	4166	208	63.46	57.64	0.91			
White women	1146	1704	558	18.37	23.58	1.28	28.95	40.90	1.41
Black men	145	166	21	2.32	2.30	0.99	3.66	3.98	1.09
Black women	80	112	32	1.28	1.55	1.21	2.02	2.69	1.33
Hispanic men	233	271	38	3.74	3.75	1.00	5.89	6.51	1.11
Hispanic women	49	106	57	0.79	1.47	1.86	1.24	2.54	2.05
Asian men	56	64	8	0.90	0.89	0.99	1.41	1.54	1.09
Asian women	29	40	11	0.47	0.55	1.17	0.73	0.96	1.32
Native American men	328	388	60	5.26	5.37	1.02	8.29	9.31	1.12
Native American women	213	210	-3	3.42	2.91	0.85	5.38	5.04	0.94
Total^a	6,237	7,227		100.01	100.01				
Grades 11-12									
White men	6016	6470	454	81.14	71.64	0.88			
White women	616	1469	853	8.31	16.27	1.96	10.24	22.70	2.22
Black men	80	115	35	1.08	1.27	1.18	1.33	1.78	1.34
Black women	36	78	42	0.49	0.86	1.76	0.60	1.21	2.02
Hispanic men	160	223	63	2.16	2.47	1.14	2.66	3.45	1.30
Hispanic women	8	45	37	0.11	0.50	4.55	0.13	0.70	5.38
Asian men	72	93	21	0.97	1.03	1.06	1.20	1.44	1.20
Asian women	17	49	32	0.23	0.54	2.35	0.28	0.76	2.71
Native American men	295	327	32	3.98	3.62	0.91	4.90	5.05	1.03
Native American women	114	162	48	1.54	1.79	1.16	1.89	2.50	1.32
Total^a	7,414	9,031		100.01	99.99				
Grades 13-15									
White men	3,199	3,554	355	87.21	79.26	0.91			
White women	187	491	304	5.10	10.95	2.15	5.85	13.82	2.36
Black men	43	72	29	1.17	1.61	1.38	1.34	2.03	1.51
Black women	12	33	21	0.33	0.74	2.24	0.38	0.93	2.45
Hispanic men	37	59	22	1.01	1.32	1.31	1.16	1.66	1.43
Hispanic women	0	10	10	0.00	0.22	^b	0.00	0.28	^b

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Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Asian men	51	46	-5	1.39	1.03	0.74	1.59	1.29	0.81
Asian women	3	10	7	0.08	0.22	2.75	0.09	0.28	3.11
Native American men	117	160	43	3.19	3.57	1.12	3.66	4.50	1.23
Native American women	19	49	30	0.52	1.09	2.10	0.59	1.38	2.34
Total^a	3,668	4,484		100.00	100.01				

^aPercentages may not add to 100 due to rounding.

^bThe amount of change (increase or decrease) cannot be computed because there was no one (0.00) in that EEO group at that grade level in the base year (1984).

Source: OPM's CPDF.

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Table I.6: Numbers, Percentages, and Relative Numbers of Specific EEO Groups in Key White-Collar Jobs by Grade Levels at the Department of Agriculture in Fiscal Years 1984 and 1992

Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Grades 1-10									
White men	20,828	15,878	-4,950	64.70	50.86	0.79			
White women	7,261	10,257	2,996	22.56	32.85	1.46	34.86	64.60	1.85
Black men	1,253	1,077	-176	3.89	3.45	0.89	6.02	6.78	1.13
Black women	644	1,057	413	2.00	3.39	1.70	3.09	6.66	2.16
Hispanic men	1,106	1,153	47	3.44	3.69	1.07	5.31	7.26	1.37
Hispanic women	255	507	252	0.79	1.62	2.05	1.22	3.19	2.61
Asian men	241	292	51	0.75	0.94	1.25	1.16	1.84	1.59
Asian women	93	180	87	0.29	0.58	2.00	0.45	1.13	2.51
Native American men	397	536	139	1.23	1.72	1.40	1.91	3.38	1.77
Native American women	114	283	169	0.35	0.91	2.60	0.55	1.78	3.24
Total^a	32,192	31,220		100.00	100.01				
Grades 11-12									
White men	12,723	11,152	-1,571	87.58	74.71	0.85			
White women	601	1,928	1,327	4.14	12.92	3.12	4.72	17.29	3.66
Black men	478	557	79	3.29	3.73	1.13	3.76	4.99	1.33
Black women	71	236	165	0.49	1.58	3.22	0.56	2.12	3.79
Hispanic men	271	393	122	1.87	2.63	1.41	2.13	3.52	1.65
Hispanic women	13	92	79	0.09	0.62	6.89	0.10	0.83	8.30
Asian men	227	290	63	1.56	1.94	1.24	1.78	2.60	1.46
Asian women	24	68	44	0.17	0.46	2.71	0.19	0.61	3.21
Native American men	118	180	62	0.81	1.21	1.49	0.93	1.61	1.73
Native American women	2	31	29	0.01	0.21	21.00	0.02	0.28	14.00
Total^a	14,528	14,927		100.01	100.01				
Grades 13-15									
White men	3,784	3,855	71	90.96	79.26	0.87			
White women	105	496	391	2.52	10.20	4.05	2.77	12.87	4.65
Black men	115	167	52	2.76	3.43	1.24	3.04	4.33	1.42
Black women	9	54	45	0.22	1.11	5.05	0.24	1.40	5.83
Hispanic men	46	94	48	1.11	1.93	1.74	1.22	2.44	2.00
Hispanic women	3	14	11	0.07	0.29	4.14	0.08	0.36	4.50

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Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Asian men	61	101	40	1.47	2.08	1.42	1.61	2.62	1.63
Asian women	5	27	22	0.12	0.56	4.67	0.13	0.70	5.38
Native American men	32	55	23	0.77	1.13	1.47	0.85	1.43	1.68
Native American women	0	1	1	0.00	0.02	^b	0.00	0.03	^b
Total^a	4,160	4,864		100.00	100.01				

^aPercentages may not add to 100 due to rounding.

^bThe amount of change (increase or decrease) cannot be computed because there was no one (0.00) in that EEO group at that grade level in the base year (1984).

Source: OPM's CPDF.

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Table I.7: Numbers, Percentages, and Relative Numbers of Specific EEO Groups in Key White-Collar Jobs by Grade Levels at the Department of the Navy in Fiscal Years 1984 and 1992

Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Grades 1-10									
White men	5,118	2,644	-2,474	67.92	62.31	0.92			
White women	1,061	603	-458	14.08	14.21	1.01	20.73	22.81	1.10
Black men	378	237	-141	5.02	5.59	1.11	7.39	8.96	1.21
Black women	163	138	-25	2.16	3.25	1.50	3.18	5.22	1.64
Hispanic men	203	155	-48	2.69	3.65	1.36	3.97	5.86	1.48
Hispanic women	40	39	-1	0.53	0.92	1.74	0.78	1.48	1.90
Asian men	465	305	-160	6.17	7.19	1.17	9.09	11.54	1.27
Asian women	83	91	8	1.10	2.14	1.95	1.62	3.44	2.12
Native American men	19	24	5	0.25	0.57	2.28	0.37	0.91	2.46
Native American women	5	7	2	0.07	0.17	2.43	0.10	0.26	2.60
Total^a	7,535	4,243	-3,292	99.99	100.00				
Grades 11-12									
White men	13,524	17,203	3,679	83.69	73.94	0.88			
White women	482	1,668	1,186	2.98	7.17	2.41	3.56	9.70	2.72
Black men	440	818	378	2.72	3.52	1.29	3.25	4.76	1.46
Black women	65	226	161	0.40	0.97	2.43	0.48	1.31	2.73
Hispanic men	338	677	339	2.09	2.91	1.39	2.50	3.94	1.58
Hispanic women	19	85	66	0.12	0.37	3.08	0.14	0.49	3.50
Asian men	1,209	2,186	977	7.48	9.40	1.26	8.94	12.71	1.42
Asian women	47	310	263	0.29	1.33	4.59	0.35	1.80	5.14
Native American men	31	81	50	0.19	0.35	1.84	0.23	0.47	2.04
Native American women	5	12	7	0.03	0.05	1.67	0.04	0.07	1.75
Total^a	16,160	23,266	7,106	99.99	100.01				
Grades 13-15									
White men	7,742	9,799	2,057	92.24	86.26	0.94			
White women	76	437	361	0.91	3.85	4.23	0.98	4.46	4.55
Black men	175	254	79	2.09	2.24	1.07	2.26	2.59	1.15
Black women	7	49	42	0.08	0.43	5.38	0.09	0.50	5.56
Hispanic men	72	174	102	0.86	1.53	1.78	0.93	1.78	1.91
Hispanic women	0	16	16	0.00	0.14	^b	0.00	0.16	^b

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Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Asian men	288	567	279	3.43	4.99	1.45	3.72	5.79	1.56
Asian women	3	35	32	0.04	0.31	7.75	0.04	0.36	9.00
Native American men	30	26	-4	0.36	0.23	0.64	0.39	0.27	0.69
Native American women	0	3	3	0.00	0.03	^b	0.00	0.03	^b
Total^a	8,393	11,360	2,967	100.01	100.01				

^aPercentages may not add to 100 due to rounding.

^bThe amount of change (increase or decrease) cannot be computed because there was no one (0.00) in that EEO group at that grade level in the base year (1984).

Source: OPM's CPDF.

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Table I.8: Numbers, Percentages, and Relative Numbers of Specific EEO Groups in Foreign Service Jobs by Grade Levels at the Department of State in Fiscal Years 1984 and 1992

Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Grades 1-10									
White men	1,046	291	-755	43.78	26.92	0.61			
White women	1,103	638	-465	46.17	59.02	1.28	105.45	219.24	2.08
Black men	55	21	-34	2.30	1.94	0.84	5.26	7.22	1.37
Black women	60	45	-15	2.51	4.16	1.66	5.74	15.46	2.69
Hispanic men	39	17	-22	1.63	1.57	0.96	3.73	5.84	1.57
Hispanic women	26	33	7	1.09	3.05	2.80	2.49	11.34	4.55
Asian men	18	4	-14	0.75	0.37	0.49	1.72	1.37	0.80
Asian women	29	24	-5	1.21	2.22	1.83	2.77	8.25	2.98
Native American men	5	2	-3	0.21	0.19	0.90	0.48	0.69	1.44
Native American women	8	6	-2	0.33	0.56	1.70	0.76	2.06	2.71
Total^a	2,389	1,081	-1,308	99.98	100.00				
Grades 11-12									
White men	1,868	1,720	-148	68.30	65.20	0.95			
White women	510	593	83	18.65	22.48	1.21	27.30	34.48	1.26
Black men	117	77	-40	4.28	2.92	0.68	6.26	4.48	0.72
Black women	70	51	-19	2.56	1.93	0.75	3.75	2.97	0.79
Hispanic men	70	85	15	2.56	3.22	1.26	3.75	4.94	1.32
Hispanic women	29	28	-1	1.06	1.06	1.00	1.55	1.63	1.05
Asian men	45	51	6	1.65	1.93	1.17	2.41	2.97	1.23
Asian women	16	20	4	0.59	0.76	1.29	0.86	1.16	1.35
Native American men	10	8	-2	0.37	0.30	0.81	0.54	0.47	0.87
Native American women	0	5	5	0.00	0.19	^b	0.00	0.29	^b
Total^a	2,735	2,638	-97	100.02	99.99				
Grades 13-15									
White men	1,912	1,696	-216	82.91	71.02	0.86			
White women	231	381	150	10.02	15.95	1.59	12.08	22.46	1.86
Black men	70	102	32	3.04	4.27	1.40	3.66	6.01	1.64
Black women	17	46	29	0.74	1.93	2.61	0.89	2.71	3.04
Hispanic men	47	82	35	2.04	3.43	1.68	2.46	4.83	1.96
Hispanic women	4	18	14	0.17	0.75	4.41	0.21	1.06	5.05

(continued)

Appendix I
Tables Showing Representation Levels and
Progress Made by Specific EEO Groups at
Four Agencies

Grade level	Number			Percent			Relative number		
	1984	1992	Change	1984	1992	Change	1984	1992	Change
Asian men	13	31	18	0.56	1.30	2.32	0.68	1.83	2.69
Asian women	8	19	11	0.35	0.80	2.29	0.42	1.12	2.67
Native American men	4	11	7	0.17	0.46	2.71	0.21	0.65	3.10
Native American women	0	2	2	0.00	0.08	^b	0.00	0.12	^b
Total^a	2,306	2,388	82	100.00	99.99				

^aPercentages may not add to 100 due to rounding.

^bThe amount of change (increase or decrease) cannot be computed because there was no one (0.00) in that EEO group at that grade level in the base year (1984).

Source: OPM's CPDF.

Appendix I
Tables Showing Representation Levels and
Progress Made by Specific EEO Groups at
Four Agencies

Table I.9: Percentages of Different EEO Groups in the CLF and the Total and White-Collar Workforces in Four Agencies and Representation Indexes Derived From Them

Total workforce	Percent					Representation index			
	Civilian	Interior	Agriculture	Navy	State	Interior	Agriculture	Navy	State
EEO group									
White men	42.6	51.1	50.5	52.2	47.6	120	119	123	112
White women	35.3	25.8	31.9	20.8	26.6	73	90	59	75
Black men	4.9	2.9	3.5	7.8	5.5	59	71	159	112
Black women	5.4	3.2	5.5	6.2	13.4	59	102	115	248
Hispanic men	4.8	2.5	2.8	2.6	2.2	52	58	54	46
Hispanic women	3.3	1.9	1.7	1.2	1.6	58	52	36	48
Asian men	1.5	0.8	1.1	6.3	1.2	53	73	420	80
Asian women	1.3	0.6	0.8	2.2	1.4	46	62	169	108
Native American men	0.3	6.1	1.2	0.5	0.2	2,033	400	167	67
Native American women	0.3	5.0	0.9	0.2	0.2	1,667	300	67	67
White-collar workforce									
EEO group	Civilian	Interior	Agriculture	Navy	State	Interior	Agriculture	Navy	State
White men	37.8	49.4	50.2	47.2	63.7	131	133	125	169
White women	44.0	28.8	32.5	28.7	24.4	65	74	65	55
Black men	3.1	2.1	3.3	4.4	3.2	68	106	142	103
Black women	5.7	3.5	5.6	8.2	2.2	61	98	144	39
Hispanic men	2.7	2.1	2.7	1.8	2.8	78	100	67	104
Hispanic women	3.1	2.1	1.7	1.7	1.2	68	55	55	39
Asian men	1.6	0.8	1.1	4.4	1.3	50	69	275	81
Asian women	1.6	0.7	0.8	3.0	0.9	44	50	188	56
Native American men	0.2	4.9	1.1	0.3	0.3	2,450	550	150	150
Native American women	0.3	5.6	0.9	0.3	0.2	1,867	300	100	67

Source: Percentages for each of the four agencies are from OPM's CPDF, for fiscal year 1992. CLF data are from the 1990 census.

Definitions of Hires, Separations, and Promotions and Tables Showing the Results of Our Analyses

OPM’s CPDF uses different codes to identify the various types of personnel actions that bring employees onto and off of agencies’ employment rolls and into different grade levels. This appendix contains the definitions of the personnel actions we used in analyzing the number of hires, separations, and promotions, as well as tables showing our analysis.

Definitions

In this report we combined data on appointments and conversions, which we refer to as hires. Appointments are personnel actions that bring individuals onto an agency’s payroll. Our analysis included the following types of appointments: career, career-conditional, excepted, reinstatement-career, and reinstatement-career-conditional. A conversion action changes an employee from one type of appointment to another type of appointment. We used data on conversions to career and career-conditional appointments.

Our analysis of separations from employment in the four agencies included both voluntary and involuntary separations. Voluntary separations consisted of voluntary retirement, special option retirement, resignation, termination due to sponsor relocation, and termination due to military service. Involuntary separations comprised the following categories: mandatory retirement, retirement due to disability, retirement in lieu of involuntary action, resignation in lieu of involuntary action, removal, termination due to disability, expiration of appointment, involuntary termination, termination, discharge during probation/trial period, and discharge. Our definition of separation excluded termination due to transfer from one agency to another and separation due to death.

The promotions data that we analyzed comprised both permanent and temporary (term) promotions. We included promotions obtained competitively and noncompetitively.

Results of Our Analyses

The following tables show that all four agencies generally hired and promoted women and minorities in higher relative numbers than those at which they were employed in 1984 and 1992. However, the separations rates for some of these groups exceeded the rates at which these groups were employed in 1992.

Appendix II
Definitions of Hires, Separations, and
Promotions and Tables Showing the Results
of Our Analyses

Table II.1: Numbers, Percentages, and Relative Numbers of Specific EEO Groups Employed, Hired, Separated From, and Promoted in Key White-Collar Jobs at the Department of the Interior in Fiscal Years 1984 and 1992

	Employed	Hired	Separated	Promoted
1984				
Number				
White men	13,296	444	690	1,514
White women	1,965	114	154	459
Black men	271	6	18	39
Black women	129	2	16	16
Hispanic men	433	21	19	86
Hispanic women	57	2	5	15
Asian men	180	5	9	10
Asian women	50	1	3	8
Native American men	745	50	59	90
Native American women	347	6	34	36
Total	17,473	651	1,007	2,273
Percentage				
White men	76.09	68.20	68.52	66.61
White women	11.25	17.51	15.29	20.19
Black men	1.55	0.92	1.79	1.72
Black women	0.74	0.31	1.59	0.70
Hispanic men	2.48	3.23	1.89	3.78
Hispanic women	0.33	0.31	0.50	0.66
Asian men	1.03	0.77	0.89	0.44
Asian women	0.29	0.15	0.30	0.35
Native American men	4.26	7.68	5.86	3.96
Native American women	1.99	0.92	3.38	1.58
Total^a	100.01	100.00	100.01	99.99
Relative number				
White men				
White women	14.78	25.68	22.32 ^b	30.32
Black men	2.04	1.35 ^b	2.61 ^b	2.58
Black women	0.97	0.45 ^b	2.32 ^b	1.06
Hispanic men	3.26	4.73	2.75	5.68
Hispanic women	0.43	0.45	0.72 ^b	0.99
Asian men	1.35	1.13 ^b	1.30	0.66 ^b
Asian women	0.38	0.23 ^b	0.43 ^b	0.53
Native American men	5.60	11.26	8.55 ^b	5.94
Native American women	2.61	1.35 ^b	4.93 ^b	2.38 ^b

(continued)

Appendix II
Definitions of Hires, Separations, and
Promotions and Tables Showing the Results
of Our Analyses

	Employed	Hired	Separated	Promoted
1992				
Number				
White men	14,285	800	471	2,028
White women	3,676	340	142	839
Black men	356	19	12	67
Black women	223	13	8	46
Hispanic men	556	29	20	116
Hispanic women	163	13	8	47
Asian men	204	11	5	25
Asian women	99	6	2	20
Native American men	882	66	35	157
Native American women	422	33	13	98
Total	20,866	1,330	716	3,443
Percentage				
White men	68.46	60.15	65.78	58.90
White women	17.62	25.56	19.83	24.37
Black men	1.71	1.43	1.68	1.95
Black women	1.07	0.98	1.12	1.34
Hispanic men	2.66	2.18	2.79	3.37
Hispanic women	0.78	0.98	1.12	1.37
Asian men	0.98	0.83	0.70	0.73
Asian women	0.47	0.45	0.28	0.58
Native American men	4.23	4.96	4.89	4.56
Native American women	2.02	2.48	1.82	2.85
Total^a	100.00	100.00	100.01	100.02
Relative number				
White men				
White women	25.73	42.50	30.15 ^b	41.37
Black men	2.49	2.38 ^b	2.55 ^b	3.30
Black women	1.56	1.63	1.70 ^b	2.27
Hispanic men	3.89	3.63 ^b	4.25 ^b	5.72
Hispanic women	1.14	1.63	1.70 ^b	2.32
Asian men	1.43	1.38 ^b	1.06	1.23 ^b
Asian women	0.69	0.75	0.42	0.99
Native American men	6.17	8.25	7.43 ^b	7.74
Native American women	2.95	4.13	2.76	4.83

(Table notes on next page)

Appendix II
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^aPercentages may not add to 100 due to rounding.

^bIndicates that the relative number that entered the workforce at the Department of Interior was less than the relative number employed or that the relative number that separated from the workforce at Interior was greater than the relative number employed or that the relative number promoted in the workforce at Interior was less than the relative number employed.

Source: OPM's CPDF data.

Table II.2: Numbers, Percentages, and Relative Numbers of Specific EEO Groups Employed In, Hired, Separated From, and Promoted in Key White-Collar Jobs at the Department of Agriculture in Fiscal Years 1984 and 1992

	Employed	Hired	Separated	Promoted
1984				
Number				
White men	37,444	1,744	2,135	4,219
White women	7,968	772	610	2,016
Black men	1,848	42	86	222
Black women	724	30	30	185
Hispanic men	1,427	55	67	200
Hispanic women	271	10	9	61
Asian men	529	20	19	80
Asian women	122	10	5	28
Native American men	547	21	41	70
Native American women	116	4	7	27
Total	50,996	2,708	3,009	7,108
Percentage				
White men	73.43	64.40	70.95	59.36
White women	15.62	28.51	20.27	28.36
Black men	3.62	1.55	2.86	3.12
Black women	1.42	1.11	1.00	2.60
Hispanic men	2.80	2.03	2.23	2.81
Hispanic women	0.53	0.37	0.30	0.86
Asian men	1.04	0.74	0.63	1.13
Asian women	0.24	0.37	0.17	0.39
Native American men	1.07	0.78	1.36	0.98
Native American women	0.23	0.15	0.23	0.38
Total^a	100.00	100.01	100.00	99.99
Relative number				
White men				
White women	21.28	44.27	28.57 ^b	47.78
Black men	4.94	2.41 ^b	4.03	5.26
Black women	1.93	1.72 ^b	1.41	4.38
Hispanic men	3.81	3.15 ^b	3.14	4.74

(continued)

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	Employed	Hired	Separated	Promoted
Hispanic women	0.72	0.57 ^b	0.42	1.45
Asian men	1.41	1.15 ^b	0.89	1.90
Asian women	0.33	0.57	0.23	0.66
Native American men	1.46	1.20 ^b	1.92 ^b	1.66
Native American women	0.31	0.23 ^b	0.33 ^b	0.64
1992				
Number				
White men	31,020	1,036	1,184	3,346
White women	12,700	756	582	3,020
Black men	1,803	93	54	255
Black women	1,347	80	52	344
Hispanic men	1,644	105	53	213
Hispanic women	613	42	20	157
Asian men	684	42	14	93
Asian women	276	19	9	72
Native American men	771	40	38	120
Native American women	315	27	18	85
Total	51,173	2,240	2,024	7,705
Percentage				
White men	60.62	46.25	58.50	43.43
White women	24.82	33.75	28.75	39.20
Black men	3.52	4.15	2.67	3.31
Black women	2.63	3.57	2.57	4.46
Hispanic men	3.21	4.69	2.62	2.76
Hispanic women	1.20	1.88	0.99	2.04
Asian men	1.34	1.88	0.69	1.21
Asian women	0.54	0.85	0.44	0.93
Native American men	1.51	1.79	1.88	1.56
Native American women	0.62	1.21	0.89	1.10
Total^a	100.01	100.02	100.00	100.00
Relative number				
White men				
White women	40.94	72.97	49.16 ^b	90.26
Black men	5.81	8.98	4.56	7.62
Black women	4.34	7.72	4.39 ^b	10.28
Hispanic men	5.30	10.14	4.48	6.37
Hispanic women	1.98	4.05	1.69	4.69
Asian men	2.21	4.05	1.18	2.78
Asian women	0.89	1.83	0.76	2.15

(continued)

Appendix II
Definitions of Hires, Separations, and
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	Employed	Hired	Separated	Promoted
1992				
Native American men	2.49	3.86	3.21 ^b	3.59
Native American women	1.02	2.61	1.52 ^b	2.54

^aPercentages may not add to 100 due to rounding.

^bIndicates that the relative number that entered the workforce at the Department of Agriculture was less than the relative number employed or that the relative number that separated from the workforce at Agriculture was greater than the relative number employed or that the relative number promoted in the workforce at Agriculture was less than the relative number employed.

Source: OPM's CPDF data.

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Definitions of Hires, Separations, and
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of Our Analyses

Table II.3: Numbers, Percentages, and Relative Numbers of Specific EEO Groups Employed In, Hired, Separated From, and Promoted in Key White-Collar Jobs at the Department of the Navy in Fiscal Years 1984 and 1992

	Employed	Hired	Separated	Promoted
1984				
Number				
White men	28,685	2,384	1,790	5,503
White women	1,695	308	139	807
Black men	1,026	113	68	278
Black women	236	34	13	94
Hispanic men	651	85	45	191
Hispanic women	59	8	7	24
Asian men	2,063	252	117	472
Asian women	138	28	6	74
Native American men	93	14	5	12
Native American women	10	0	1	2
Total	34,656	3,226	2,191	7,457
Percentage				
White men	82.77	73.90	81.70	73.80
White women	4.89	9.55	6.34	10.82
Black men	2.96	3.50	3.10	3.73
Black women	0.68	1.05	0.59	1.26
Hispanic men	1.88	2.63	2.05	2.56
Hispanic women	0.17	0.25	0.32	0.32
Asian men	5.95	7.81	5.34	6.33
Asian women	0.40	0.87	0.27	0.99
Native American men	0.27	0.43	0.23	0.16
Native American women	0.03	0.00	0.05	0.03
Total^a	100.00	99.99	99.99	100.00
Relative number				
White men				
White women	5.91	12.92	7.77 ^b	14.66
Black men	3.58	4.74	3.80 ^b	5.05
Black women	0.82	1.43	0.73	1.71
Hispanic men	2.27	3.57	2.51 ^b	3.47
Hispanic women	0.21	0.34	0.39 ^b	0.44
Asian men	7.19	10.57	6.54	8.58
Asian women	0.48	1.17	0.34	1.34
Native American men	0.32	0.59	0.28	0.22 ^b
Native American women	0.03	0.00 ^b	0.06 ^b	0.04

(continued)

Appendix II
Definitions of Hires, Separations, and
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	Employed	Hired	Separated	Promoted
1992				
Number				
White men	32,103	531	1,333	4,046
White women	2,894	102	160	747
Black men	1,359	21	59	244
Black women	416	16	18	112
Hispanic men	1,073	31	47	222
Hispanic women	145	9	6	50
Asian men	3,257	78	106	572
Asian women	468	15	28	152
Native American men	151	5	14	17
Native American women	23	0	0	8
Total	41,889	808	1,771	6,170
Percentage				
White men	76.64	65.72	75.27	65.58
White women	6.91	12.62	9.03	12.11
Black men	3.24	2.60	3.33	3.95
Black women	0.99	1.98	1.02	1.82
Hispanic men	2.56	3.84	2.65	3.60
Hispanic women	0.35	1.11	0.34	0.81
Asian men	7.78	9.65	5.99	9.27
Asian women	1.12	1.86	1.58	2.46
Native American men	0.36	0.62	0.79	0.28
Native American women	0.05	0.00	0.00	0.13
Total^a	100.00	100.00	100.00	100.01
Relative number				
White men				
White women	9.02	19.21	12.00 ^b	18.46
Black men	4.23	3.95 ^b	4.43 ^b	6.03
Black women	1.30	3.01	1.35 ^b	2.77
Hispanic men	3.34	5.84	3.53 ^b	5.49
Hispanic women	0.45	1.69	0.45	1.24
Asian men	10.15	14.69	7.95	14.14
Asian women	1.46	2.82	2.10 ^b	3.76
Native American men	0.47	0.94	1.05 ^b	0.42 ^b
Native American women	0.07	0.00 ^b	0.00	0.20

(Table notes on next page)

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^aPercentages may not add to 100 due to rounding.

^bIndicates that the relative number that entered the workforce at the Department of the Navy was less than the relative number employed or that the relative number that separated from the workforce at Navy was greater than the relative number employed or that the relative number promoted in the workforce at Navy was less than the relative number employed.

Source: OPM's CPDF data.

Table II.4: Numbers, Percentages, and Relative Numbers of Specific EEO Groups Employed In, Hired, Separated From, and Promoted in Foreign Service Jobs at the Department of State in Fiscal Years 1984 and 1992

	Employed	Hired	Separated	Promoted
1984				
Number				
White men	5,568	286	6	828
White women	1,872	114	0	314
Black men	253	16	0	23
Black women	147	13	0	27
Hispanic men	168	23	0	38
Hispanic women	59	8	0	11
Asian men	80	6	0	13
Asian women	53	6	0	8
Native American men	19	0	0	4
Native American women	8	0	0	0
Total	8,227	472	6	1,266
Percentage				
White men	67.68	60.59	100.00	65.40
White women	22.75	24.15	0.00	24.80
Black men	3.08	3.39	0.00	1.82
Black women	1.79	2.75	0.00	2.13
Hispanic men	2.04	4.87	0.00	3.00
Hispanic women	0.72	1.69	0.00	0.87
Asian men	0.97	1.27	0.00	1.03
Asian women	0.64	1.27	0.00	0.63
Native American men	0.23	0.00	0.00	0.32
Native American women	0.10	0.00	0.00	0.00
Total^a	100.00	99.98	100.00	100.00
Relative number				
White men				
White women	33.62	39.86	0.00	37.92
Black men	4.54	5.59	0.00	2.78 ^b
Black women	2.64	4.55	0.00	3.26
Hispanic men	3.02	8.04	0.00	4.59

(continued)

Appendix II
Definitions of Hires, Separations, and
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	Employed	Hired	Separated	Promoted
Hispanic women	1.06	2.80	0.00	1.33
Asian men	1.44	2.10	0.00	1.57
Asian women	0.95	2.10	0.00	0.97
Native American men	0.34	0.00 ^b	0.00	0.48
Native American women	0.14	0.00 ^b	0.00	0.00 ^b
1992				
Number				
White men	4,387	458	248	529
White women	1,678	140	111	282
Black men	218	19	14	31
Black women	149	9	8	21
Hispanic men	194	19	8	32
Hispanic women	79	6	2	11
Asian men	87	12	1	10
Asian women	64	11	3	11
Native American men	21	3	3	2
Native American women	13	3	0	2
Total	6,890	680	398	931
Percentage				
White men	63.67	67.35	62.31	56.82
White women	24.35	20.59	27.89	30.29
Black men	3.16	2.79	3.52	3.33
Black women	2.16	1.32	2.01	2.26
Hispanic men	2.82	2.79	2.01	3.44
Hispanic women	1.15	0.88	0.50	1.18
Asian men	1.26	1.76	0.25	1.07
Asian women	0.93	1.62	0.75	1.18
Native American men	0.30	0.44	0.75	0.21
Native American women	0.19	0.44	0.00	0.21
Total^a	99.99	99.98	99.99	99.99
Relative number				
White men				
White women	38.25	30.57 ^b	44.76 ^b	53.31
Black men	4.97	4.15 ^b	5.65 ^b	5.86
Black women	3.40	1.97 ^b	3.23	3.97
Hispanic men	4.42	4.15 ^b	3.23	6.05
Hispanic women	1.80	1.31 ^b	0.81	2.08

(continued)

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Definitions of Hires, Separations, and
Promotions and Tables Showing the Results
of Our Analyses

	Employed	Hired	Separated	Promoted
1992				
Asian men	1.98	2.62	0.40	1.89 ^b
Asian women	1.46	2.40	1.21	2.08
Native American men	0.48	0.66	1.21 ^b	0.38 ^b
Native American women	0.30	0.66	0.00	0.38

^aPercentages may not add to 100 due to rounding.

^bIndicates that the relative number that entered the workforce at the Department of State was less than the relative number employed or that the relative number that separated from the workforce at State was greater than the relative number employed or that the relative number promoted in the workforce at State was less than the relative number employed.

Source: OPM's CPDF data.

Comments From the Department of Defense



FORCE MANAGEMENT
POLICY

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000



JUN 14 1995

Ms. Nancy Kingsbury
Director, Federal Human Resource
Management Issues
General Government Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Ms. Kingsbury:

This is the Department of Defense (DoD) response to the General Accounting Office (GAO) draft report, "EQUAL EMPLOYMENT OPPORTUNITY: Women and Minority Representation at Interior, Agriculture, Navy, and State," dated May 16, 1995 (GAO Code 966497), OSD Case 9942. The Department concurs with the report.

One technical correction was provided to the GAO under separate cover. We would, however, like to address the discussion in the GAO draft report of the 1989 Equal Employment Opportunity Commission's (EEOC) on-site review of the Department of the Navy's (DON) Equal Employment Opportunity Program and provide a program update. The EEOC offered specific recommendations regarding the DON's need to address underrepresentation of women and minorities in Senior Executive Service (SES) and upper grade levels and evaluate its Merit Promotion Program for adverse impact on EEO groups. The DON agreed to implement all of the EEOC recommendations.

Specifically, the Secretary of the Navy established a Standing Committee on Military and Civilian Women in the Navy. One of the two working groups established focused on professional development, and eighty initiatives were established to ensure the integration of women into the work force. All of the measures were approved by the Secretary, and many have been implemented. These include 1-day career workshops for women in grades GS-14 and GS-15 at geographic locations throughout the DON. The workshops included sessions on executive competencies and training required to be more competitive for senior level positions. Similar workshops were also conducted for Hispanic men and women in grades GS-13 to GS-15. African American members of the SES also conducted a similar seminar for African American GS-15 level employees.

Several specific actions were initiated to increase the representation of minorities and women in science and engineering positions. A barrier analysis identified the lack of candidates at the entry level for these occupational categories as an impediment to recruiting. The Cooperative Education Program (CO-OP) was targeted. The DON recruitment for this program has been heavily weighted to engineering and has been successful in attracting minorities and women to the program. The DON has been successful in converting these student employees to



career status at the end of their CO-OP appointment. Other DON programs have been developed to financially assist Historically Black Colleges and Universities and Minority Institutions in retaining promising students who are potential DON recruits for science and engineering occupations. A Science Scholars Programs was developed with a traditionally women's college to give technically competent women an opportunity to better prepare to enter or re-enter the mainstream of science.

Further, the DON funds and participates in the DoD Science and Engineering Apprenticeship Program for high school students. This program encourages the enthusiasm and capabilities of high school students and teachers who show strong aptitude for or interest in science and engineering. About 12 percent of the students in this "pipeline" program are African Americans and Hispanics; 40 percent are women.

In 1992, the DON Advisory Council on Hispanic Employment (ACHE) was chartered by the Deputy Assistant Secretary of the Navy for Civilian Personnel Policy and Equal Employment Opportunity [DASN (CPP/EEO)]. The ACHE is comprised of line managers at the GM-13 to SES levels. The council advises the DASN (CPP/EEO) on the problems and barriers faced by Hispanics in DON employment and recommends solutions. The ACHE has co-sponsored with the Office of Civilian Personnel Management, two career development workshops for Hispanics in grades GS-13 through GS-15. The ACHE also sponsors the DON Hispanic Five Point Program Recognition Award to recognize individuals for their commitment and support of the DON Five Point Hispanic Program.

The EEOC recommended that the DON establish uniform EEO performance standards for managers and supervisors, including civilian affirmative employment and EEO responsibilities in military evaluation reports. The DON took immediate action to strengthen the requirements for Equal Employment Opportunity/Affirmative Employment Program (EEO/AEP) performance of executives and managers. The Secretary of the Navy developed and disseminated uniform mandatory performance standards. He also transmitted an advice and guidance message to ensure that the results of existing management accountability systems (e.g., performance management and Inspector General reviews) were in keeping with EEO standards. Further the DASN (CPP/EEO), in a letter to SES members, discussed their roles and responsibilities and the EEOC report. In addition, the Chief of Naval Personnel approved the inclusion of civilian EEO/AEP accomplishments in military managers' fitness reports.

The final EEOC recommendation cited by the GAO draft report was the DON acceleration of its analysis of separations, particularly the high rate at which minorities and women are separated. The DON extracted data to conduct the recommended analysis and provided the results, with recommendations, to the EEOC.

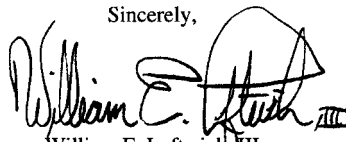
The DoD is pleased to report that in 1995, the Secretary of the Navy approved the establishment of eight EEO initiatives (Enclosure 1), seven of which specifically address underrepresentation of minorities and women employed in the DON.

Appendix III
Comments From the Department of Defense

Finally, on May 10, 1995, the DoD issued an Action Agenda for Civilian EEO Progress in the DoD (Enclosure 2). This document includes 25 action steps, clustered in 9 categories, which are intended to improve the representation of minorities, women, and persons with disabilities in grades GS/GM-13 and above. The Action Agenda represents the first guidance which requires all DoD Components to implement DoD-wide EEO objectives. The DoD Component must issue guidance implementing the Action Agenda within their organizations by July 10, 1995.

The Department appreciates the opportunity to comment on the draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "William E. Leftwich, III". The signature is stylized with a large, looped "W" and a cursive "Leftwich".

William E. Leftwich, III
Deputy Assistant Secretary of Defense
(Equal Opportunity)

Enclosures:
As stated

Comments From the Department of the Interior



United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, D.C. 20240

June 5, 1996

Ms. Nancy Kingsbury
Director
Federal Human Resource Management Issues
U. S. General Accounting Office
441 G. Street, N.W. - Room 3858
Washington, D.C. 20548

Dear Ms. Kingsbury:

I have reviewed the draft GAO Report "EQUAL EMPLOYMENT OPPORTUNITY: Women and Minority Representation at Interior, Agriculture, Navy, and State." Although the eight year period covered in the report ended several years ago, I am pleased that the Department of the Interior (DOI) is generally shown to be improving. Since the end of the period covered by your report, DOI has substantially strengthened our diversity efforts, and made a number of significant other improvements in the affirmative employment program (AEP) noted below.

DOI obtained a variance from the Equal Employment Opportunity Commission to allow us to compute our representation based on occupation-specific analysis and, where appropriate, to subtract from these calculations the large number of American Indians and Alaskan Natives hired by the Bureau of Indian Affairs under rules allowing Indian preference. With this approach we were able to identify the precise amount of under-representation for each AEP group for each populous occupation, as shown for the first time in our FY 1995 AEP Report. With these figures we can now establish a proportionate link between our goals and specific under-representation problems.

The FY 95 AEP Report also identified the steps needed to manage the recruitment and selection process for better results. This will involve shifting the responsibility for most AEP goal accomplishment to line managers. There is now real accountability of SES managers for AEP accomplishment, and enforcement of this accountability. DOI has recently started the Automated Vacancy Announcement Distribution System (AVADS), the computer support needed to track the race, ethnic origin, gender and/or disability of applicants for vacancies.

With these improvements, we anticipate even better representation in the future. But the limiting factor for the rate of change in the next few years will probably be the number of opportunities

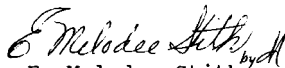
Appendix IV
Comments From the Department of the
Interior

- 2 -

for new hires. DOI decreased its work force by 7% in FY 1994, and further reductions are anticipated. Thus, we anticipate shifting greater emphasis to issues regarding training, glass ceiling, and internal movement.

Thank you for your useful analysis. Please do not hesitate to contact me on (202)208-5693 or Mercedes Flores on (202)208-6120, if you have any further inquiry.

Sincerely,

A handwritten signature in cursive script, appearing to read "E. Melodee Stith", followed by a small "by M" in the right margin.

E. Melodee Stith
Director
Office for Equal Opportunity

Comments From the Office of Personnel Management



OFFICE OF THE DIRECTOR

**UNITED STATES
OFFICE OF PERSONNEL MANAGEMENT**

WASHINGTON, D.C. 20415

JUN 20 1995

Ms. Nancy R. Kingsbury
Director
Federal Human Resource Management Issues
U.S. General Accounting Office
Washington, DC 20548

Dear Ms. Kingsbury:

The Office of Personnel Management has completed its review of the draft report; "Equal Employment Opportunity: Women and Minority Representation at Interior, Agriculture, Navy and State."

The report underscores the findings of the National Performance Review. There is much duplication between the requirements and oversight roles of OPM and the Equal Employment Opportunity Commission. Current requirements place too much emphasis on process rather than on result.

I am actually gratified that OPM's review of agency FEORP plans has focussed, not on checking off whether each specific requirement was met, but rather that the agency is committed to eliminating underrepresentation, that it is making progress to that end, and that it continues to experiment with innovative recruitment approaches. This focus is especially important as agencies downsize and work to eliminate management overhead positions.

The issue of collecting data from job applicants about their race and national origin is especially sensitive. This agency is opposed to collecting such data for several reasons. The first concerns accountability. We believe that agencies should be held accountable for the compositions of their selections. The composition of the applicant pool is little more than an excuse; an attempt to deflect accountability away from deciding officials and onto personnel support staff. The FEORP program itself suffers from this misplaced accountability.

The second reason we oppose collecting this data on job applicants is that it is a reporting burden. We have recently

See pp. 6, 65.

Appendix V
Comments From the Office of Personnel
Management

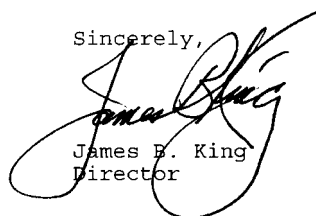
eliminated the standard job application form, the SF 171, because it was a burden on applicants. We do not want to create a new standard form, especially one that will discourage some applicants.

Thirdly, we regard collection of this data as costly and ineffective. The Government does not need to spend scarce resources printing, storing, distributing, and reading new forms. We do not need to invest in software to analyze the data and statisticians to interpret it. Our past experience is that the data is inherently unreliable because the collection is based on applicants' voluntary cooperation and self-identification.

There is no dispute that the effectiveness of affirmative recruitment can be measured by the composition of the applicant pools. But in our zeal to recruit a representative workforce, we must keep faith with the merit principle that actions are taken without regard to a person's race or national origin. Collecting this data can give rise to a perception that race is a selection factor.

If you would like to meet to discuss our views, please contact Leonard Klein at (202)-606-0800. Thank you for an opportunity to review and comment.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. King", is written over the typed name and title.

James E. King
Director

Comments From the Equal Employment Opportunity Commission



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, DC 20507

JUL 7 1995

Office of
the Chairman

Nancy Kingsbury
Director
Federal Human Resource Management
Issues
United States General Accounting Office
Washington, D.C. 20548

Dear Ms. Kingsbury:

We met with your staff on June 21, 1995, regarding your proposed report entitled Equal Employment Opportunity: Women and Minority Representation at Interior, Agriculture, Navy, and State and provided your staff with very specific comments. We hope that the final version of the report reflects all of those specific concerns raised during the meeting. Below are our general concerns regarding your two key findings concerning the Equal Employment Opportunity Commission (EEOC).

The two key findings are that Federal agencies did not follow EEOC's instructions in their analyses of affirmative employment programs and that EEOC approved agency plans which did not adhere to EEO MD-714. Based on these findings, GAO concluded that EEOC did not provide the oversight necessary to ensure that agencies' affirmative employment programs can effectively correct imbalances in the agencies' workforces. The Commission disagrees with these findings and the conclusion.

With respect to the finding that Federal agencies did not follow EEOC's instructions, the draft report cited as one example, on page 9, that, "none of the agencies' plans included the barrier analysis EEOC instructed agencies to do to explain the fundamental cause of underrepresentation and identify corrective action." When we objected that all four plans did contain barrier analysis, your staff agreed but stated that they did not conform with EEO MD-714 (13)(a)(1) which provides the requirements for program analysis of organization and resources. We disagree. This section does not apply to the analysis of barriers. Barrier identification and analysis are to be conducted after a program analysis of the affirmative employment program. The directive requires that agencies select problems and barriers within their control that can be eliminated within the five-year cycle and that affect PATCOB categories and major occupations. The directive also requires identification of specific actions to eliminate each problem and barrier.

See pp. 7, 8,
72-3.

Appendix D also provides examples of barrier analysis. Subsequent to the meeting, we again verified that the plans of the four agencies met the requirements of EEO MD-714.

The draft report also stated that the four agency plans did not conform to EEO MD-714 because they were incomplete. This is incorrect. All four agencies submitted multi-year plans between FY 1988 and FY 1990. EEOC reviewed and approved all the plans. The plans were in conformance with EEO MD-714 in that they contained the required program analysis and all program elements including objectives and action items, work force data, major occupational data, grade level data and plans for the prevention of sexual harassment. Your staff indicated during the meeting that the draft report had used the terms "plans" and "accomplishment reports" interchangeably. As we pointed out, this error could be the reason that the proposed report mistakenly found that agencies were not following EEO MD-714.

Agencies were required to submit a multi-year affirmative employment program plan for the cycle of the management directive. In developing a multi-year plan, agencies are required to analyze the eight program elements. The final plan may include some or all of these elements. Agencies are also required to submit an annual accomplishment report and plan update. The annual reporting requirements are not the same as for the multi-year plan. The annual accomplishment report need only include statistical data and analysis of the agency's work force by PATCOB, grade groupings, and major occupations, and should describe progress in achieving objectives and action items, and noteworthy activities or initiatives.

As noted in previous meetings with your staff, the program analysis questions in EEO MD-714 are considered as guidance and not specific requirements. Federal agencies vary in size and composition of work force, and their plans may vary from each other. Therefore, EEOC has to allow some latitude in each agency's implementation of their affirmative employment plan.

We are troubled that the report develops conclusions based upon an incorrect assessment of EEOC's oversight of Federal agency affirmative employment programs. As noted above and during the meeting, we feel that there are several areas of the report that need to be revised.

During the June 21, 1995 meeting, your staff also provided us with a copy of a letter from the Office of Personnel Management (OPM) dated June 20, 1995. The following responds to your request for our views on that letter. In it, OPM stated that it opposed collecting applicant flow data about race and national origin on the stated grounds that 1) it is more important to hold officials accountable for the composition of their selections

than to focus on the applicant pool, 2) it is burdensome for applicants to supply the data, and 3) the data collection is costly and ineffective.

There are significant problems with the OPM's arguments. Most notably, collection of the data is required by the regulations set forth at 29 C.F.R. Part 1607. *See* §1607.4 and 1607.15A(2). Those regulations are binding on employers in both the public and private sectors and were issued jointly by several federal agencies, notably including OPM's predecessor, the Civil Service Commission. Thus, OPM cannot unilaterally free itself or other agencies of the obligations.

Of equal consequence, private sector employers are required to collect the data. The public rightfully expects that the government will adhere to the same obligations that it imposes on others.

Finally, we are puzzled about the foundation for some of OPM's assertions. For example, OPM contends that it is more important to hold officials accountable for their selections than to track applicant flow. Often, however, knowledge about the applicant pool will be necessary to be able to hold officials accountable. In addition, it is difficult to understand how applicants are burdened by providing the information. They need do no more than check a box or fill in a blank. We know of no basis for assuming, as OPM apparently does, that applicants may be deterred from applying by the mere existence of questions about race or ethnicity. If there is such evidence, it should be countered by educating applicants about the uses and limits on the use of the information.

If you have any questions please contact Aletha L. Brown, Acting Inspector General, (202) 663-4379.

Sincerely,



Gilbert F. Casellas
Chairman

Major Contributors to This Report

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