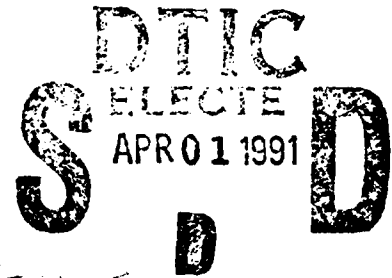


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**EQUAL EMPLOYMENT OPPORTUNITY
IN THE DEPARTMENT OF DEFENSE:**

**ENHANCING MANAGERIAL
RESPONSIBILITY**

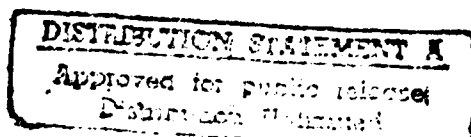
Submitted to:



**Department of Defense
Office of the Assistant Secretary for
Civilian Employment and Equal Employment Opportunity
The Pentagon
Washington, D.C.**

Submitted by:

**DYNAMIC CONCEPTS, INC.
2176 Wisconsin Avenue, N.W.
Washington, D.C. 20007**



March 31, 1989

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March 31, 1989

EQUAL EMPLOYMENT OPPORTUNITY IN THE DEPARTMENT OF DEFENSE:
ENHANCING MANAGERIAL RESPONSIBILITY

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EXECUTIVE SUMMARY

EQUAL EMPLOYMENT OPPORTUNITY IN THE DEPARTMENT OF DEFENSE: ENHANCING MANAGERIAL RESPONSIBILITY

This study is the result of on-site research conducted at eight military installations in the Department of Defense (DOD). Its objective is to determine the extent to which Equal Employment Opportunity (EEO) is incorporated in the performance appraisals of managers in the Senior Executive Service (SES), GM 13-15 managers and Federal Wage System Supervisors (FWS). Research at each of the eight military installations in study included both interviews with managers to obtain their perceptions and understanding of the EEO role in their performance appraisals and a review of actual managerial performance appraisals conducted in appraisal years 1985, 1986 and 1987.

The study reviews federal and DOD EEO policies, particularly those requiring the inclusion of EEO objectives in the performance appraisals of managers. The EEO policies of the military departments are also reviewed to determine what policies are applicable to the military installations examined in the study.

The results of the individual interviews with managers indicated that EEO is generally a separate critical element in

management performance appraisals; that managers' supervisors generally discuss EEO expectations with them; that EEO is generally given equal weight with other performance critical elements; that the mode of documenting EEO accomplishments of managers relies heavily on the self-assessment of managers; that managers' accomplishments in EEO are dispersed, but focused largely on recruitment and selection of women and minorities; that most managers believe that a mere filing of a discrimination charge against a manager should not reflect on managerial performance reviews, but that a finding of such discrimination should be included in managerial appraisals. Managers generally support the inclusion of the prevention of sexual harassment in the EEO critical element. However, a significant number of such managers were not sure that sexual harassment issues are an appropriate component of EEO policy.

Managers provided a variety of recommendations for improving the inclusion of EEO in their performance appraisals to include EEO. These include training, developing closer relationships with external organizations focused on minorities, women and those with disabilities, stronger leadership from the commander or chief's office for EEO-based performance ratings and more regular information-sharing about the progress and accomplishments of EEO.

Analysis of the written performance appraisals of managers for the three test years failed to corroborate interview

findings. EEO was not always established as a separate critical element in managerial performance appraisals; performance standards were seldom clear, specific in their documentary requirements or related to the agency's affirmative action objectives. Some managers received the highest possible performance reviews without clear reference to their EEO accomplishments. The availability and quality of performance appraisal records varied widely at the installations.

Based on both the written interviews and the reviews of actual management performance appraisals, the study provides a variety of recommendations for enhancing EEO accountability among DOD managers. These recommendations include establishing EEO as a separate critical element for covered managers; developing clear and strong performance standards with specific documentation requirements and relationship to agency affirmative action objectives; incorporating all eight categories of affirmative action (namely recruitment, selection, training, awards/incentives, promotions, separations, terminations and out reach) in the performance standards; requiring documented accomplishment in EEO as a basis for high performance ratings; establishing clear reporting standards and requirements; use of external minority and women oriented institutions and organizations, working with the disabled to advance EEO objectives cited specifically in managerial performance appraisals; inclusion of sexual harassment prevention as an EEO component and developing direct involvement of commanders and

chiefs of units and installations in the implementation of managerial performance appraisals.

Recommendations are developed both at the DOD-wide and service-wide levels. These two overlapping levels of recommendations are designed to reinforce policy implementation at the installation level. The study urges that recommendations build upon the existing strengths of the system. Moreover, a series of EEO workshops for appropriate managers should precede and therefore facilitate implementation of study recommendations.

**EQUAL EMPLOYMENT OPPORTUNITY IN THE DEPARTMENT OF DEFENSE:
ENHANCING MANAGERIAL RESPONSIBILITY**

I. STATEMENT OF THE PROBLEM

The objectives of this report are:

- A. To describe and discuss the results of on-site reviews of EEO compliance as reflected in written managerial performance appraisal records at eight military installations in the metropolitan Washington, D.C. area;
- B. To describe and to discuss the results of interviews with managers in the Senior Executive Service (SES), GM 13-15 classification and in the Federal Wage System (FWS) category. In these interviews managers were questioned on their understanding and perception of the extent to which EEO is and should be incorporated in managerial performance appraisals; and
- C. Based on examination of managerial performance appraisals and surveys of managers at eight military installations, to provide recommendations for enhancing EEO accountability among managers throughout the Department of Defense (DOD).

EEO is essential to DOD's mission to provide for the national security of all Americans. It is a critical instrument for assuring that civilian employees regardless of race, sex, or

disabling conditions*, play a part in providing for the defense of our nation. The need for EEO results from both the efforts of the nation to address the historical exclusion and degradation of minorities, women and persons with disabilities and the determination of public policy-makers to correct and compensate for such wrongs. The statutes and regulations of the United States relating to the advancement of equal employment opportunity for all Americans attempt to address glaring disparities in the occupational, income, educational and socioeconomic status of minorities, women, and persons with disabilities. In addition, cases involving discrimination by public employers have been tried under Title VII of the Civil Rights Act of 1964 (the Equal Employment Opportunity Act of 1972 extended the protections of Title VII to public employers) and as a constitutional claim under the Equal Protection Clause of the 14th Amendment. That clause says that no state shall "deny to any person within its jurisdiction the equal protection of the laws."¹

* Because findings related to managers with disabilities were statistically insignificant, no separate data description or analysis is provided for them in this study.

¹John Nalbandian, "The U.S. Supreme Court's Consensus on Affirmative Action," Public Administration Review, v. 49, n. 1, January/February 1989, p. 38. See also, Griggs v. Duke Power Company, 401 U.S. 424 (1971).

Recent reports unequivocally document continued inequities in the incomes, employment and general economic status of minority Americans.² These reports cite the critical importance of affirmative action programs in assuring employment opportunities for qualified minorities, particularly in federal, state and local government. Indeed, as Krislov and others indicate, government is the principal source of employment for blacks and a major source of contracts and awards for minority-owned and women-owned business.³

The problem of assuring full labor force participation of minority groups, women and persons with disabilities is more than the problem of formulating and promulgating clear and sound equal employment opportunity policies. Among the most significant problems of EEO enforcement is the assurance of management leadership and support in making agencies accountable for the implementation of EEO policies, procedures and practices.

Agency managers are the technical, professional and political leadership of government agencies and their constituent subunits. They can enhance or frustrate, make clear or vague the

²See, for example, Congressional Task Force on the Future of Afro-Americans, The Future of Afro-Americans to the Year 2000 (Washington, D.C.: Congress of the United States, 1988).

³Samuel Krislov, The Negro and Federal Employment (Minneapolis, Minnesota: The University of Minnesota Press, 1967); and Lawrence C. Howard, Lenneal J. Henderson and Deryl Hunt, Eds., Public Administration and Public Policy: A Minority Perspective (Pittsburgh, Pennsylvania: Public Policy Press, 1977).

advancement of EEO. Their leadership and interaction with their managerial colleagues and subordinates can assure that support for EEO reaches and properly motivates all key elements of the agency's mission and programs. Managers help to determine whether EEO will be a substantial and significant contribution to the DOD workforce and mission, merely perfunctory or even a source of conflict and agitation within their agencies.

Consequently, the problem addressed in this report is how managers in military installations can creatively, constructively and explicitly comply with DOD EEO policies, regulations and procedures. Building upon the existing base of EEO experience, the report focuses on the incorporation and use of EEO critical elements in the managerial performance appraisals of senior managers at DOD military installations.

II. THE EEO POLICY BACKGROUND

Given societal inequities between minorities and the remainder of American society and between women and men, federal EEO policies are directed to instituting regulations in DOD agencies that forbid employment discrimination and that require affirmative action to correct the past effects of discrimination. These actions include eight categories of activities discussed later in this section.

The objectives of this section are two-fold: First, to describe and discuss requirements of selected U.S. Department of Defense agencies to include equal employment opportunity (EEO)

considerations in the performance appraisals of Senior Executive Service, GM and Federal Wage Systems managers; and second, to provide a brief assessment of these requirements.

This section reviews the EEO/Performance Appraisal policies and procedures within the Department of Defense, in particular the Departments of the Army, Navy, Air Force and the Defense Logistics Agency, using as a sample eight (8) installations in the metropolitan Washington, D.C. area.

The basis for most of the policies and procedures developed by the Defense components are derived from Title VII of the Civil Rights Act of 1964 (as amended in 1972) and the Civil Service Reform Act of 1978. Most of the Defense components promulgated EEO policies and procedures prior to the Department of Defense Directive No. 1440.1, Equal Employment Opportunities for Civilian Employees in the Department of Defense, dated May 27, 1987. In addition to reviewing these two statutes, the EEO policies and procedures of the Defense components and DOD Directive 1440.1, Equal Opportunity for Civilian Employees in the Department of Defense, we also reviewed performance appraisal forms used in 1985, 1986 and 1987 by these Defense components. This review establishes the relationship between policy/procedural requirements for EEO components in performance appraisals and actual rating practices.

A. DEPARTMENT OF DEFENSE DIRECTIVE #1440.1

Equal Employment Opportunities for Civilian Employees in the Department of Defense, dated May 27, 1987

This directive relates to the DOD civilian Equal Employment Opportunity Program and applies specifically to the Defense components, to the Office of the Secretary of Defense and activities supported administratively by that office, the Military Departments, the Organization of the Joint Chiefs of Staff, the Unified and Specified Commands, the Defense Agencies, the Army and Air Force Exchange Service, the National Guard Bureau, the Uniformed Services University of the Medical Programs of the Uniformed Services, and the DOD Dependent Schools. The directive applies worldwide to all civilian employees and applicants for civilian employment. Military personnel are not covered by this directive. They are covered by DOD Directive 1350.2, "Military Equal Employment Opportunity in the Department of Defense."

The directive sets forth the policy of the Department not to discriminate on the basis of race, color, religion, sex, national origin, handicapping condition, or age. It states that DOD recognizes EEO programs, as an integral part of the readiness equation, will develop and implement Affirmative Action Programs (AAPs), and will eliminate barriers and practices which impede equal employment opportunities. In addition to setting forth Department policy and reporting requirements on the subject of EEO, the directive goes on to spell out the duties and

responsibilities of the various officials and managers responsible for the EEO program. It is in this context that it is mandated that all Heads of DOD Components, or their designees, shall "require that all supervisors, managers, and other Components personnel, military and civilian, with EEO responsibilities be evaluated on the performance of those responsibilities."

Overall, this document is comprehensive and clearly establishes that EEO is to be a critical element of the performance appraisal of all DOD managers and supervisors.

B. POLICY MEMORANDUM FROM THE SECRETARY OF DEFENSE ON CIVILIAN EEO

Dated March 9, 1988

Among the list of recipients of this policy memorandum were the Secretaries of the Military Departments, the Chairman of the Joint Chiefs of Staff, Under Secretary of Defense, Assistant Secretaries of Defense, the Directors of the Defense Agencies. The memorandum sets forth the commitment of the Secretary of Defense to equal employment opportunity at DOD. It instructs the recipients to engage in a number of activities to improve the Affirmative Action Program of the Department. The memorandum concludes by directing, "all officials to whom responsibility is delegated for implementation of...equal employment opportunity and affirmative action programs must have their efforts in that connection included in their performance evaluations along with

other criteria." The memorandum goes on to state that critical elements for SES members, and Performance Management Review System (PMRS) personnel "should include specific EEO performance standards" where it is appropriate.

This document clearly establishes that it is the intent and expectation of the Secretary of Defense that EEO is to be a critical element of the performance appraisals of all DOD managers and supervisors with EEO responsibilities.

C. OTHER DIRECTIVES BEARING ON EEO CRITERIA IN PERFORMANCE APPRAISALS

Title VII of the Civil Rights Act of 1964, as amended, encourages employers that are subject to the Act to alter employment systems to implement the purposes of Title VII. These changes often manifest themselves in the form of affirmative action. The Equal Employment Opportunity Commission (EEOC) has, on occasion, set forth affirmative action plans which are part of Commission conciliation or settlement agreements. Some such plans have included the provision that supervisors who were found to have violated the Act would be "graded" or evaluated on their ability to accord EEO in the area of jurisdiction in the workplace (29 CFR 1608).

D. THE DEPARTMENT OF THE ARMY

Department of the Army Interim Change I05 to Army Regulation 690-400, Chapter 430, April 1988.

This Department of the Army regulation states that, "EEO will be a critical element in all supervisory positions with responsibility for carrying out local affirmative action plan requirements. Also, EEO will be a critical element in managing official positions where program management actions directly affect EEO. The Commander shall provide for appropriate involvement of EEO officials in determining which supervisors and managers should have EEO as a critical element, and preparing model standards for the EEO critical element, and in advising the rating officials on evaluation of performance." The Department of the Army makes clear the involvement of the EEO Officer in determining which supervisor and manager should have EEO as a critical element, and in advising the rating officials on evaluation of performance.

The Army provides large volumes of material which are guidelines and instructions for employment performance and utilization. These documents are frequently updated and amended through dated interim changes. In an interim change dated 23 May 1986, installation Commanders are instructed to "develop specific operating procedures governing PSRB's under their jurisdiction. These operating procedures must be in writing and will include matters such as scope of operations and review of performance standards, follow-up actions, reporting requirements, frequency of meetings, record keeping, and administrative support". Such instructions are designed to hold managers accountable for documenting the performance of supervisors. The same directive

requires that EEO and affirmative action as established as an important Army goal and a significant aspect of supervisory and managerial positions. The directive states that "...To achieve this goal, EEO will be a critical element in all supervisory positions with responsibility for carrying out local affirmative action plan requirements".

E. THE DEPARTMENT OF THE NAVY

Chief of Naval Operations Instructions 12720.2,

February 2, 1982

These instructions indicate that EEO elements are to be listed as critical elements in work standards for all managerial and supervisory personnel. However, these instructions were effectively cancelled by a letter issued on March 21, 1986. This letter of cancellation is not intended to relax EEO requirements for performance appraisals, but as yet, no superceding instructions have been issued. Nevertheless, instructions for completing performance appraisal forms for GS/GM 13-15 include in Part II "...Supervisory positions must include an objective describing the employee's supervisory responsibilities (i.e., performance management, equal employment opportunity...)". The revision date of the form is 11-85.

In listing Instructions for Completing Performance Appraisal Review System (PARA Form), equal employment opportunity is not specifically listed as a critical element on the form itself.

The form is dated (4-87) and is a form used in the appraisal of supervisors (NAVSO 12430). A penned notation states - PARS (New) GS&FWS. The implied assumption is that this form replaces the title form dated 11-85.

Instructions for Completing OPNAV 124030 SES/GS 13-15

Performance Appraisal has a written notation: SES (old GM). The instruction form is not dated but is attached to the performance appraisal form OPNAV 12430 which bears the date 3-82. The instruction form specifies "...Although SES members don't identify critical elements, they should identify significant objectives. Supervisory positions with significant personnel management decision making responsibilities must include an EEO objective".

The list of standards for critical elements appended to the form entitled GM-Managers and Supervisors has the notation APAS (new GM). The form is dated 6-87 and lists EEO as a critical element under personnel management. A reference states that "This element is applicable only to employees who technically and administratively supervise at least three subordinates. Do not rate this element if employee is not a supervisor".

THE U.S. MARINE CORPS - QUANTICO

Although no separate documents submitted by the U.S. Marine Corps identified EEO elements as being incorporated in the annual

performance appraisals of managers, it is our understanding that the Marine Corps uses the Department of Navy guidelines for including EEO in managerial performance appraisals.

F. DEPARTMENT OF THE AIR FORCE

Air Force Regulation 40-452, Performance Management Program,
July 1, 1984*

This regulation establishes the performance appraisal, pay and recognition program for the Air force. That portion of the regulations (Sections 2-6 to 2-9(c)), contains a section entitled Identifying Special Supervisory Performance Elements (Section 2-9). This section provides that for "managers and supervisors" an EEO element must be included in their performance plans as "a specific requirement when it is set forth in the organization's Affirmative Action Plan, or is required of the supervisor according to the ...EEO program..."

If this is the extent of the Air Force's policy and performance appraisal guidance on EEO as an element of performing plans, then it would appear to be inadequate judging from the policy, standards, and guidance set forth by the other agencies studied Army, Navy and the Defense Logistics. The Agency requirement set forth is not clear as to breadth of applicability

* This regulation has been significantly modified by a large number of guidance letters which do not impact directly on EEO and managerial performance appraisals.

as is weak as a manifestation of DOD policy as set forth in the Departmental Directive and the Secretary's memo discussed above. Further, there would appear to be a need for additional guidance as to the use of the EEO standard in performance plans much like the DLA and Army have done.

G. THE DEFENSE LOGISTICS AGENCY

The Defense Logistics Agency (DLA) regulation number 1434.1 describes its Performance Appraisal for the Performance Management Review System (PMS). The purpose and scope and policy for performance appraisals are described in detail in this directive. Definitions and procedures are also indicated in detail. It is important to note that two systems exist within DLA so as not to distort how EEO is rated within DLA. The report only references the Performance Management System (PMS), which covers employees in GS-1 through GS-15 positions and wage grade equivalents. PMS employees generally occupy nonsupervisory/nonmanagerial positions and generally do not have EEO responsibilities. Those who do have supervisory responsibilities are rated on their EEO responsibilities. The other performance appraisal system is the Performance Management and Recognition System (PMRS) which covers supervisory and managerial employees in grades 13 through 15. The regulations for both PMS and PMRS employees provide guidance to rating officials regarding the circumstances under which EEO should be established as a critical element or as a part of the personnel

management element or supervisory element. A key part of the policy is the section on "Special Features for Performance Plans". Paragraph I.B. of this section of the policy describes the Equal Employment Opportunity requirements. EEO is described as a critical element in "some supervisory positions". Supervisory positions with EEO requirements are, "dependent upon the level of the positions, the number of positions supervised, and the extent to which the occupant of the position is directly involved in, or has the opportunity to, implement EEO goals". In such instances, EEO must be included among the performance standards on which managers are rated.

The second part of the EEO component specifies that when establishing performance standards for affirmative action/EEO, such factors as attrition rates, current levels of EEO achievement, use of specialized recruitment sources, should be taken into consideration. DLA limits its EEO requirements to recruitments. However, it should be recognized that there are eight critical areas of affirmative action and they should be clearly identified in EEO policies. These areas include recruitment, selection, assignment, outreach, promotion, training, awards and separations. When rating performance of this function, there should be no adverse impact on the rating of an employee who has no opportunity to make measurable progress.

In DLA regulation No. 1446, Equal Employment Opportunity (EEO) Program, dated April 18, 1984, the agency directs that all DLA personnel understand their responsibilities in achieving EEO goals. The same directive makes it incumbent on the heads of HQ DLA PSEs to assure that all subordinate supervisors are taking appropriate action in support of DLA's objective to achieve a fully integrated workforce at all levels. Equal Employment Managers (EEM) are to maintain surveillance over the personnel programs with identified problems concerning under-representation and to ensure EEO performance evaluation of supervisors.

H. ASSESSMENT AND OBSERVATIONS

On the basis of our review and assessment of the materials provided by Defense agencies on EEO/performance appraisal requirements, we offer the following observations:

1. Most agencies, following DOD Directive #1440.1, have developed and implemented requirements establishing EEO as a critical element in the performance appraisal of managers. Although the U.S. Marine Corp base at Quantico has submitted no documents identifying EEO as a critical element in managerial performance appraisals, we understand that they comply with Navy performance appraisals/EEO requirements.

2. Although variations in EEO/performance appraisal policies, procedures and forms are evident, the Alternative Performance Appraisal System (APAS) used by NAFVAC does not appear to strictly comply with DOD Directive #1440.1; and
3. This policy and procedure overview provides the context for discussion of the results of on-site interviews with key managers and for review of selected managerial performance appraisal files at selected institutions.
4. A further review and list of recommendations is provided in the recommendations section of this report.

III. RESEARCH METHODOLOGY OF THE STUDY

Given the extensive federal and DOD EEO policy context, the research methodology was designed to determine how those policies were implemented. Specifically, the focus of the research was the extent to which EEO accountability is incorporated into the managerial performance appraisals of SES, GM 13-15 managers and federal wage system managers at eight military installations. Specific research objectives included:

- (1) To better understand current efforts to include EEO in the performance appraisal of managers;
- (2) To examine the extent to which EEO is a critical element in management performance ratings;

- (3) To examine the nature and rigor of EEO performance standards upon which management performance ratings are based;
- (4) To obtain the perceptions of DOD installation managers of EEO as a performance criterion and their recommendations for improving the system;
- (5) To review the actual performance appraisals of the sample of DOD installation managers, including those interviewed, to better understand how EEO is actually included in performance ratings at the eight installations; and
- (6) Based on the empirical findings resulting from analysis of EEO policies, managerial interview results and reviews of performance appraisals, to generate recommendations for enhancing EEO accountability in performance appraisals.

Research methodology avoided the following assumptions:

- (1) That installations leaders are not making the best possible efforts to maintain accountability for EEO implementation among managers;
- (2) That exemplary practices at one or more installations did not exist and that, consequently, there was no foundation upon which to build stronger EEO accountability;
- (3) That all installations could implement EEO performance appraisals in the same way; and

- (4) That any glaring weakness found in managerial performance on EEO elements were attributable to inherent weaknesses in federal statutory, regulatory or judicial policies on EEO.

The limitations of the research methodology included the conducting of interviews in the months of July and August 1988, clearly the least opportune and appropriate time to conduct such interviews. Managers were away on vacation. Performance appraisals for foregoing performance periods were in progress. Consequently, records availability was problematical. Moreover, some managers had recently moved up to managerial status and had no or one performance appraisal available. Records for other managers were not always available.

IV. MAJOR FINDINGS OF THE STUDY

A. The Results of Managerial Interviews

This section describes and discusses the results of 175 interviews of managers at the eight study installations. Managers were asked whether or not EEO is currently a critical and separate element in their annual performance appraisals; whether supervisors informed them about how they were going to be rated on EEO; whether EEO is given equal weight among criteria or performance elements; whether EEO accomplishments are sited to complete performance appraisals; whether filings and/or findings of EEO complaints should affect performance appraisals; whether prevention of sexual harassment should be included in EEO and

thus as part of the managers' performance ratings and, finally, what recommendations the managers would propose for enhancing EEO in performance appraisals. A copy of the survey instrument is attached to this report as Appendix I. Findings are as follows.

1. EEO As A Separate Element in Performance Appraisals

The objective of this section is to determine whether respondents identify EEO as a separate element in managerial performance appraisals, and to examine the variation of perceptions by managers and supervisors of all installations in incorporating EEO as a separate element in annual performance reviews.

Taken as a whole, the majority of the people interviewed at the eight installations studied, stated that EEO was a separate element in their performance appraisals. As Table 1 indicates, however, there is a wide variation among installations on perceptions about EEO as a separate element. For example, Fort Belvoir managers recognize EEO as a separate and discreet element in their appraisals. They all were conscious of EEO's singular role in assessing managerial competence. NAVFAC, on the other hand, was more likely to treat EEO as a subelement of its Human Resources Element if it is included at all. As Table 1 indicates, eleven out of the 25 people interviewed stated that EEO was not an element in their performance appraisal. Moreover, more than one-half of the respondents at Andrews Air Force Base indicated that EEO was not an element at all.

Clearly, installations vary in the use of critical element status for maintaining EEO accountability. A key policy dilemma is how to maintain EEO accountability when EEO is not a separate element.

A second issue is the extent to which managers are aware of the status of EEO in their performance appraisals. Even when appraisal policies are clearly articulated in writing and managers have been apprised of these policies, managerial awareness of the status of EEO as a critical element, subelement or no element is uneven. For example, Andrews' managers exhibit wide variation in their knowledge of the EEO component even when there is a uniform policy. Consequently, aside from the continuing need to maintain written policies and procedures, other mechanisms of managerial awareness appear to be necessary.

2. Supervisor Consultation With Managers on Standards for Evaluating EEO Performance

As an essential part of the appraisal process, managers were asked whether their supervisors ever discussed with them standards for evaluating their performance on EEO. Table II describes those results. Most managerial supervisors at all participating installations discuss standards for evaluating EEO performance.

Although it is not clear how often or intensely these discussions occur, managers do indicate that EEO performance standards discussions do take place. However, almost 25% of

managerial supervisors do not discuss with managers standards for evaluating EEO on performance appraisals. While far less than a majority, 25% remains too high to maximize EEO accountability among managers. Given the status of EEO as a separate element or subelement at most installations, supervisor-manager consultation is essential.

3. The Weighting of EEO Elements

Managers were asked to indicate the relative weighting of the EEO element or subelement in relation to other elements or subelements of the performance appraisal. As Table 3 indicates, most respondents believe that EEO elements and subelements are given equal weight relative to other performance appraisal elements. Responses to this question were impressionistic since no documentary evidence was employed to substantiate responses.

However, a significant number of managers believe that EEO is given less weight in performance appraisals than other elements. At NAVFAC and DLA Administrative Support, two installations that maintain EEO as a subelement, 50% or more of the responding managers believe that the EEO subelement is given less weight. Few managers (11) believe that EEO is given more weight and fewer managers (6) indicate that they did not know EEO weight.

Consequently, the clear implication of responses to the EEO weighting question is the need for a stronger policy signal on the relative importance of EEO as an element or subelement.

Whether actual EEO accomplishments have been substantial or justifiably weak or strong, it is essential that managers know how supervisors should rank EEO critical elements or subelements among other elements of their performance appraisals. Moreover, whether or not opportunities for advancing affirmative action are made smaller by budget, numbers of subordinates supervised or numbers of vacancies, EEO should be clearly fixed in personnel management priorities.

4. The Use of Documentation to Support EEO Ratings

Table 4 indicates whether narrative documentary evidence is used in managerial EEO ratings. There are four essential implications in the distribution of responses to this issue:

- a. Most managers did indicate that some form of documentary evidence is used to support the EEO rating in their performance appraisals;
- b. However, some of the managers whose EEO ratings are supported by narrative documentary evidence also stated that self-assessment was the primary evidence provided to their supervisor for their ratings. (Self-assessment is the listing by a manager of his or her own EEO accomplishments. A key issue is the extent to which the manager's supervisor relies on this self assessment to complete the managerial EEO rating. Stated differently, do supervisors rating the EEO performance of managers corroborate or check self-

assessments provided by managers before completing EEO ratings?);

- c. Fifty managers indicated that no documentary evidence was used to support their EEO ratings or they did not know whether such evidence was used. Clearly this is too high a number to support good EEO performance appraisal practices. Not only should documentary evidence be routinely used to support EEO ratings, but managers should take their role in generating and corroborating it more seriously and should be clear about how it will be used;
- d. Narrative documentary evidence of EEO accomplishments seldom use the eight categories of EEO activity specified in affirmative action policies; and
- e. In at least two installations, a majority of respondents said that no documentary evidence was used to support EEO ratings.

5. The Affirmative Action Accomplishments of Managers

a. Distribution of Accomplishments

Given the current status of EEO in managerial performance appraisals, installation managers were asked to describe their accomplishments in eight key categories of affirmative action: recruitment, hiring, promotions, training, upward mobility programs, awards, and fairness in disciplinary actions. Four

essential points should be considered in the context of responses to this question:

- (1) Respondents could identify accomplishments in more than one category. Indeed, given the totality of managerial responsibility at most installations, managers did use two or more measures of advanced affirmative action.
- (2) Opportunities to perform in some affirmative action categories were circumscribed by budgetary or human resource constraints at some installations. Some managers operate under protracted hiring and/or promotional freezes making them unable to use recruitment, hiring or promotion to advance EEO. Other managers supervise too few employees to use upward mobility programs for affirmative action. While it is true that performance appraisals were reviewed for accomplishments, the comparison was made against the EEO element rating and toughness of the performance standard of the appraisal. We did not match accomplishments with responses made during interviews.
- (3) In the absence of clear, quantitative and qualitative affirmative action goals and objectives at several installations, respondents' descriptions of their affirmative action accomplishments may or may not relate directly to installation EEO goals and objectives. For example, managers indicating activity in providing upward mobility programs for minority or

female employees did not simultaneously indicate what proportion of the installation's EEO requirements was accomplished with such programs. This suggests either the lack of managerial awareness of EEO installation goals and objectives or the need to more directly relate accomplishments to such objectives when pursuing affirmative actions.

Table 5 describes the accomplishments of managers in the eight affirmative action categories. These findings suggest wide variation in the accomplishments of managers at participating installations. Clearly, there is as much affirmative action activity at the post-entry level of a female or minority employee's experience as at the entry recruitment or hiring level. Hiring and training are the two most active affirmative action categories in managerial responses. Upward mobility programs and promotions are the next highest categories of accomplishment. Installations are remarkable similar in their patterns of accomplishment in affirmative action evidenced in Table 5. Only Quantico seems more active in training and upward mobility programs after minority or female employees were hired than at the recruitment or hiring level.

An additional key point to be made about these accomplishments is the interrelationships among the affirmative action categories. If responses had tended to aggregate primarily at the recruitment and hiring levels, post-entry affirmative action programs could be interpreted as deficient.

Conversely, if most EEO activity occurred on the job, questions could be raised about the causes of ineffective recruitment and entry-level actions. The accomplishments of managers across such a wide variety of affirmative action measures suggests EEO programs with a proper distribution of entry and post-entry components.

Finally, managers responding in the "Other" category identified activities with great promise in future affirmative action programming. For example, one black manager has maintained an ongoing relationship with a small historically black college as a source of not only recruitment and hiring of minority employees, but also as a site for cultivating long-term interest in careers in public service. He regularly visits the campus providing detailed descriptions of job opportunities at his installation, identifying appropriate employment values and attitudes for attaining jobs and emphasizing the need for rigorous academic preparation for employment success.

Several managers serve on the installation Equal Opportunity Employment Councils for one or more years. These Councils guide the installation in the formulation, revision and implementation of affirmative action goals and objectives; identify recurring race or gender problems at the installation and, at some installations, advise civilian personnel officials on appropriate strategies for pursuing EEO objectives. At most installations, membership on these Councils rotate. Not all managers serve on the Councils nor are the Councils predominantly minority or

female in composition at the installations. However, Council's role in enhancing affirmative action as a part of policy implementation at the installation had been cited by a few managers as a key EEO accomplishment.

b. Recording EEO Accomplishments in Performance Appraisals
Table 6 describes the extent to which managerial affirmative action accomplishments are recorded in the managers' performance appraisal. More than 60% of managers indicated that their EEO accomplishments are recorded in their performance appraisals. This finding supports the findings in Table 6 on the use of narrative documentary evidence. It is important to note that the accomplishments recorded in performance appraisals may or may not relate to cited EEO goals and objectives at the installation, that is, not all accomplishments are described as taken to fulfill stated affirmative action objectives of the installation.

Most significant are the 47 (37.7%) managers who indicated that either affirmative action accomplishments are not recorded in performance appraisals or they had no accomplishments to record. The implications of this finding are:

- (1) EEO accomplishments were not sufficiently significant to be properly documented in performance appraisals of managers; and/or
- (2) EEO accomplishments were not ranked in importance with other critical elements or subelements to warrant documentation.

Seventeen managers (13%) conceded that they had accomplished no affirmative action in spite of DOD, service and installation EEO policies. Combined with responses to the question on the existence of narrative documentary evidence to support EEO ratings, the forty-seven managers (37.7%) with either no EEO accomplishments or no documented EEO accomplishments represent a poor articulation of EEO in performance appraisal practices and results.

Documentation is essential both for the proper evaluation of managers with clearly defined EEO responsibilities and for the establishment and evaluation of EEO goals and objectives. Although 62.3% of managers indicated that their EEO accomplishments are recorded in performance appraisals, a more uniform process for recording and documenting these accomplishments seems necessary and, more importantly, all managers should be required to indicate how they perform on EEO regardless of the absence or extent of accomplishments. Only in this way can EEO accountability be extended and maintained.

6. EEO Complaints and Performance Appraisals

Respondents were asked to indicate whether the filing of a complaint alleging discrimination should impact on a manager's performance appraisal. As Table 7 indicates, managers believe that the mere filing of a charge of racial or gender discrimination against a manager should have no or little impact on performance evaluations. Those indications that the impact of

such filings "depends" cited that the seriousness of the charge, that the frequency of charges, and that the impact of the discrimination were contextual issues in determining the impact of the allegation on managerial appraisals. However, managers were clear that, unless the process of investigation of the allegation was complete and a finding had been made, only in extreme cases should the manager's performance record be impacted.

Conversely, 68% of managers strongly concur that a finding of discrimination against a manager should have a great deal of impact on his or her performance appraisal. Managers believe that discrimination represents a serious managerial deficiency worthy of note on the evaluation of managerial performance. In the "depends" category, managers identified the following extenuating circumstances:

- (1) Whether or not the finding represents a first time offense for a manager;
- (2) Whether or not the charges were serious in both the intent of the manager and the impact on affected parties;
- (3) Whether or not the installation is prepared to "rehabilitate" the offending manager so as to restore him or her to higher standing in the managerial community and complete compliance with EEO policies, procedures and regulations; and

- (4) Whether or not managers' explanations of "their side" of the finding suggests that an adverse impact on their performance appraisal is warranted.

Table 8 is clear in suggesting that a finding of discrimination should impact on evaluations. Anecdotally, managers also commented that findings of discrimination should be used -- absent the names of offending managers-- to develop racism and sexism prevention practices in management. Periodic training sessions, managerial briefings and small group meetings among managers were among the mechanisms suggested for discrimination prevention.

Finally, it is clear that the issue of racial and gender-based complaints is a sensitive issue at the military installations we visited, particularly among managers. Policy-makers, managers, employees, employee associations, and appropriate third parties can be organized to discuss and take the offensive on discrimination before allegations of discrimination occur. Once they occur, tension, conflict and misunderstanding often exist both in the interim between a filing of discrimination and the indication of a finding that discrimination did or did not occur. Much of this travail can be prevented by early formulation of cooperative strategies among all affected parties.

7. The Prevention of Sexual Harassment as an EEO Subelement

In conjunction with the discussion of discrimination prevention, managers were asked to indicate whether the prevention of sexual harassment in the work place should be included as a specific subelement of the EEO performance appraisal element. Table 9 describes managerial responses to this question. Most managers (56.6%) believe that the prevention of sexual harassment should be a separate subelement within EEO. Some argue that sexual harassment should be a separate element or subelement because of the unique character of its concerns and processes needed to adjudicate charges. However, a significant number of managers 68 or 38.9% believe that sexual harassment is an inappropriate inclusion in the EEO mission. Others believe that no separate personnel action or grievance procedure of any kind is appropriate for sexual harassment charges. Still others contend that sexual harassment is too difficult to document and "dilutes" legitimate EEO concerns.

However, of the managers that support the incorporation of sexual harassment prevention in the EEO critical element, they understand that prevention is not sexual harassment adjudication or conflict resolution. They appreciate that the prevention component is largely educational and complements other EEO training activities.

8. Management Recommendations for Enhancing EEO

A key part of the study of EEO/performance appraisal relationships are the recommendations for enhancing EEO made by managers. Table 10 describes the distribution of manager recommendations for EEO improvement. Five key points should be made about these findings.

- (1) The largest category of response is "Other". These include diverse proposals, including developing closer relationships with minority institutions of higher learning; working more vigorously on the prevention of discrimination through small groups of managers; the need for the command level and senior-level managers to clearly articulate and to lead the implementation of EEO standards in all employee performance appraisals; reinforcement of EEO as a critical element in performance appraisals with a clearer and better definition of EEO standards.
- (2) The next largest category of response is the need for training and information dissemination in the incorporation of EEO in performance appraisals. Although few managers actually describe the ideal content and format of such training and education, they were insistent on the need for going beyond current training and information-sharing schemes among managers.

- (3) Fifty managers believe that either the existing system of relating EEO to performance appraisals needs no improvement or they have no recommendations to make to enhance or improve the system. This represents a large component of satisfaction bordering on complacency with the existing system that actions resulting from this report clearly need to address.
- (4) Thirty managers emphasized the need for stronger support and enforcement from senior managers. They contend that EEO will not be taken seriously, even as a critical element, unless managers clearly define and enforce the standards and unless the process of documenting accomplishments is improved.
- (5) A smaller number of managers emphasized the need to document accomplishments, align accomplishments with EEO goals and objectives, review the overall objectives of the performance appraisal system or give equal weight to EEO critical elements or subelements in order to warrant documentation.

A subsequent component of the report will address both managerial and study team recommendations in more detail. However, the recommendations of these managers about the relationships of EEO to performance appraisals reflect their experiences with the system and their understanding of its overall operation and effectiveness.

9. Survey Results by Pay Plan, Gender and Race

a. The Pay Plan Distributions

Comparison of survey results by pay plan (managerial status), gender and race provides a description of variations in respondents' understanding and attitude towards the relationship of EEO to management performance appraisals. Pay plan respondents included members of the Senior Executive Service (SES), managers in the GM 13-15 classification and Federal Wage System Supervisors (FWS). Although there were almost six times as many GM 13-15 respondents in the study as either SES or FWS, variations in their response to key study questions are evident.

As Table 11 indicates, seventy percent of the SES identified EEO as a separate element in their performance appraisals. In contrast, only 53% of the GM and 47.6% of the FWS identified EEO as a separate element. In addition, almost ninety percent of the SES indicated that their supervisors discussed EEO expectations with them. Almost 74% of the GM and only 47.6% of the FWS recalled having discussions with supervisors about EEO (Table 12).

Most of the SES, GM and FWS indicated that EEO is generally given equal weight with other critical elements of the performance appraisal. Slightly more of the SES suggest that EEO is given more weight than other elements and slightly more of the GM indicate that EEO is given less weight (Table 13). But significantly more FWS (14.3%) did not know whether EEO is given more, less or equal weight in performance ratings.

Table 14 indicates that more of the FWS believe that a filing or a finding of racial discrimination should have a great deal of impact on managerial performance ratings than either the SES or the GM. However, most managers, regardless of pay plan, believe that the mere filing of an EEO complaint against a manager should impact minimally, if at all, on the manager's performance rating. Most believe that an actual finding of discrimination should directly impact the manager's performance appraisal.

Should sexual harassment be included as part of the EEO element in managerial performance appraisals? More than fifty percent of all managerial classifications believe so. However, members of the SES were least enthusiastic (50%); members of the FWS were the most enthusiastic about a sexual harassment/EEO sub-element (67%) according to Table 15.

The distribution of survey responses by pay plan indicate that the SES demonstrate a greater awareness of EEO as a separate appraisal element, discuss EEO more often with supervisors; are less inclined to allow the finding of racial discrimination to impact negatively on performance ratings and are less supportive than GMS or the FWS of the idea of including sexual harassment in the EEO element.

The GM 13-15 group is considerably less aware of EEO as a separate element (53%) than the SES; indicate that supervisors do discuss EEO with them; are slightly more inclined to believe that EEO receives less weight than other critical elements (19.7%);

more strongly believe that a finding of discrimination should impact on performance ratings and are far more inclined that the SES to support the inclusion of sexual harassment in the EEO element.

The FWS were less able than the SES or the GM to identify EEO as a separate appraisal element; far less likely to have discussed EEO with their supervisors; more inclined to believe that EEO is given equal weighting with other appraisal elements and stronger in their belief that a finding of discrimination should be reflected in managerial performance records. The FWS were far more supportive of the inclusion of sexual harassment in the EEO element than their SES and GM counterparts.

These findings suggest the need for:

- (1) More collective briefings and training for all managers on EEO;
- (2) Formal inclusion of EEO and related subject matter in the short and long-term training of SES, GM and the FWS at institutions like the Federal Executive Institute, the Government Executive Institute⁴ and federal executive seminar centers at Kings Point, New York, Oak Ridge, Tennessee and Denver, Colorado;

⁴At this writing, the Federal Executive and Government Executive Institutes are being merged under the Federal Executive Institute in Charlottesville, Virginia. The Government Executive Institute will become the Federal Executive Institute, Washington, D.C.

- (3) A formal requirement that annual briefings on EEO take place for all managers and orienting briefings on EEO be required for new managers;
- (4) Identification of the best means of amending EEO mandates to include prevention of sexual harassment into the EEO element for management performance appraisals.

b. The Gender Distributions

Male and female managers tended to show similar patterns of response on the survey. For example, on the question of including sexual harassment in the EEO element (Table 16), female managers were slightly less supportive of the concept (54.5%) than male managers (55.6%). However, in three areas, significant differences appear in the responses of male and female managers.

First, only 48.4% of female managers were able to identify EEO as a separate critical element. In contrast, 63.9% of male managers identified EEO as a separate element. Part of this contrast may be explained by the greater numbers of woman managers working at installations where EEO is not included as a separate critical element. However, part of the variation may also be explained by the relatively smaller number of women managers in the study (Table 17).

Second, slightly more of the female managers indicate that supervisors discussed EEO expectations with them (57.5%) as opposed to male managers (53.3%) (Table 18). Anecdotally, many female managers also indicated that they had been managers for a

shorter period of time than their male counterparts. As a result, more thorough briefings from supervisors were forthcoming.

Third, far fewer female managers believe that a findings of discrimination should negatively affect performance ratings than do their male counterparts (Table 19). More female managers indicate that a finding should have an impact depending upon the circumstances under which the finding occurred. Clearly, this result runs contrary to expectations that female managers would be more insistent on having findings of discrimination influence performance ratings than men. However, it is important to remember that the relatively smaller number of women managers represented in the study may tend to overstate this result.

c. The Racial Distributions

Although black managers in the SES, GM and FWS classifications, taken together, only represent a mere 14.3% of the respondents, their responses tended to be significantly dissimilar from other managers on a variety of survey items. Only fifty percent of black managers identified EEO as a separate performance appraisal element (Table 20) in contrast to more than 56% of white managers. Table 21 indicates that only 45.8% of black managers received a briefing or had discussions about EEO with their supervisors. More than 54% of white managers had such discussions with their supervisors. Some black managers suggested that, because they are black and presumed by their supervisors to be automatically sensitive to EEO issues,

supervisors did not find it necessary to hold briefing discussions with them.

One black manager intimated that his supervisor refused to hold EEO briefing discussions with him because the black manager only supervised white males. Since there were no black or white females, the presumption was that EEO issues were not likely to arise.

Black managers believe much more strongly than white managers that a finding of discrimination should be reflected in managerial performance ratings (Table 22). More than 79% of black managers and only 65% of white managers would mark performance ratings of managers when a finding of discrimination was established during the rating period.

As Table 23 clearly indicates, black managers are more inclined to include sexual harassment in the EEO element than white managers. Almost 63% of the black managers and almost 55% of the white managers support the proposal to make sexual harassment a component of the EEO critical element. Some black managers indicated that their experiences with racial discrimination made them more sensitive to the need to impose sanctions on those indulging in sexual harassment. These managers also stressed the need for prevention of such harassment through training and briefings.

These findings suggest that black managers support a generally stronger stand on most EEO and performance appraisal

relationships. They want EEO to be a stronger and more substantive part of the managerial performance appraisal.

10. Summary and Conclusions

The foregoing findings reveal some differences in the distribution of survey responses by pay plan, gender and race. Extent of identification of an EEO separate element, supervisorial discussions on EEO, attitudes towards entering a finding of discrimination in performance appraisals and support for the inclusion of sexual harassment in the EEO element revealed differences among managers based on classification, gender and race. SES managers tend to be better informed about EEO but are less inclined to be punitive towards managers against whom there is a findings of discrimination. Male and female managers tend to be more similar in their survey responses than white and black managers. Black managers support stronger EEO initiatives and support the incorporation of actions to prevent sexual harassment in the EEO critical element.

These differences in the responses of managers also reflect the differences in their organizational status, occupational socialization experiences and level of experience with racial and gender-based discrimination. Greater SES awareness, for example, is reflective of the generally longer years of service and/or the great depth of training and exposure of these senior-level managers. Female and black managers generally have more experience with discrimination and harassment than white males.

The concluding recommendations of this report include ways and means of constructively sharing differences in experience to advance the goal of greater EEO accountability.

a. The Results of Managerial Performance Appraisal Reviews

In addition to the analysis of survey responses, an analysis of a sample of managerial performance appraisals for the period 1985 through 1987 was conducted, particularly of those managers included in the foregoing survey. Not all of the records of all managers were available for the three years. Nor were the records that were made available always complete or clear. However, a review of existant records provided an indication of what the current practice of relating EEO to management performance is at the military installations included in the survey.

As the analysis of the performance appraisals proceeds, it is important to point out that the number of records which reflect on any one item may vary. Not all records include information on or related to a given item of analysis; hence, there are variations in the total number of records examined per item.

(1) Is EEO a Separate Element in Performance Records?

As Table 24 indicates, only 35.3% of the managerial performance appraisals indicate that EEO is established as a separate element. The Army Material Command (AMC) and Fort Belvoir are far more inclined to rate managers on a separate EEO element than the other six installations. Conversely, Andrews

Air Force Base and the Navy Facilities Command (NAVFAC) are far less likely to rate managers on a separate and distinct EEO element. NAVFAC subsumes EEO in a Human Resources Critical Element. Thus, managers are rated on EEO within the general context of human resources management. Only the SES are rated separately on EEO because they are not included in the Alternative Performance Appraisal System (APAS). Moreover, Andrews did not establish a separate EEO rating category for most managerial performance appraisals.

These findings tend to contradict the results of surveys of managers at the eight installations. The majority of all managers surveyed indicated that EEO was a separate performance appraisal element. However, the position of NAVFAC and Andrews is corroborated by survey results. They either do not maintain EEO as a separate element for most managers or have yet to establish it as an element in any performance evaluation.

(2) Is EEO a Critical Element?

Table 25 clearly indicates that a vast majority of the performance records reviewed do not clearly establish EEO as a critical element in performance appraisals (32.8%). The 65.3% of the records in the "Inapplicable" category reflect unclear indications of EEO or inapplicability due to the submergence of EEO in other, usually personnel or human resources, critical elements.

The failure to establish EEO as a critical performance appraisal element is clearly evident in Table 26. Although very

few installations are without some category or status for EEO, it has not been given sufficient priority to rank it as a critical element for managers. AMC and Fort Belvoir have made the most substantial progress in establishing and maintaining EEO as a critical element. But most installations fall into the "Inapplicable" category on the criticality of EEO.

Part of the explanation for the failure to establish EEO as a separate critical element is found in Table 26. Although only 11.7% of the records reflect the inclusion of EEO as part of another performance element, most of the records in the "NO" category have no EEO category or indication and for most of the records in the "Inapplicable" category, no reference to EEO could be found at all.

(3) Is There Any EEO Performance Standard Indicated
In Managerial Performance Appraisals?

As Table 27 points out, only 12.8% of the managerial performance appraisals reviewed indicate a clearly established EEO performance standard. Almost 83% of the records reveal no standard or it is difficult to ascertain reference to an EEO performance standard. This finding tends to support questionnaire responses to questions about the documentation of EEO accomplishments, the use of self-assessments as a basis for many performance ratings on EEO and some uncertainty by managers about what to list as an EEO accomplishment.

It is also clear that without a status as a separate critical element in managerial performance expectations, EEO

performance standards will tend to be general and ambiguous, if present at all. The eight categories of affirmative action accomplishment indicated in the first part of this report provide a framework for an EEO performance standard. Few of the performance records adequately utilize these eight categories in the formulation of an EEO performance standard.

(4) EEO Performance Ratings in Management Performance
Records

Table 18 describes the distribution of managers in the various performance rating categories. Of those records that were ascertainable, a vast majority were rated in either the, "Exceptional" or "Outstanding" category or the "Highly Successful" or "Exceeds Fully" category. As Perry, Petrakis and Miller argue in a recent article, part of this inflation in ratings is endemic to the Performance Management and Recognition System (PMRS). Their study, conducted in 1986 and 1987, indicates that more than ninety percent of all employees rated under PMRS were rated in the "Exceptional/Outstanding" or "Highly Successful/Exceeds Fully" categories.⁵ Rating categories or enforcement of standards for rating categories are not sufficiently rigorous to expand the distribution of rated employees throughout all rating categories.

⁵James L. Perry, Beth Ann Petrakis and Theodore K. Miller, "Federal Merit Pay, Round II: An Analysis of the Performance Management and Recognition System," Public Administration Review, v. 49, N.1, January/February 1989, pp. 27-38.

With nearly sixty percent of the rated managers receiving EEO ratings of one of the two highest categories, the question of the rigor of the performance standard immediately emerges. Using the strictest possible interpretation of the DOD EEO policies and regulations, including both DOD-wide standards and those of the services, Table 29 classifies the EEO performance standards of the military installations by rigorousness. Of the 1,157 records reviewed, covering three rating periods, 1985, 1986 and 1987, 946 records reflected weak, non-ascertainable or inapplicable application of EEO performance standards. With more than 81.7% of the managerial performance appraisals reflecting a less than satisfactory application of EEO rating standards, EEO policy enforcement in performance ratings must be characterized as weak or barely existing. That so many of the records demonstrate how difficult it is to discover documentary evidence of EEO action is suggests the need for collective thinking about how best to make EEO performance standards workable, measurable and documentable.

Documentation of the EEO managerial accomplishments that fall within the eight categories of affirmative action indicated earlier is clearly a significant problem at most military installations. Table 31 describes the distribution of EEO accomplishments or results by military installation. The principal problem is not the failure to accomplish EEO results but the apparent difficulty of documenting or clearly describing the results on performance appraisals so that they may be easily or clearly identified and evaluated. Not only were EEO

accomplishments identified in only 15.3% of the records reviewed but 74.4% of the records were undecipherable as to EEO accomplishments or results.

The clear message in Tables 27 through 30 is the need for establishing clear, consistent and substantial EEO performance standards consistent with DOD EEO policies and regulations; for establishing even clearer and more rigorous criteria for complying with the standard; for careful and strict rating of managers on fulfilling criteria for attaining higher EEO performance ratings and for substantial documentation of EEO accomplishments and results in fulfilling the requirements of EEO performance standards. If general performance record-keeping is poor, EEO performance records are in almost total disarray. Poor EEO documentation not only erodes the capability of the federal personnel system to reward excellence in EEO accountability but severely impedes the ability of installations to share useful knowledge about effective EEO enforcement strategies with each other. Consequently, both compliance and information dissemination objectives are impeded by poor administration of the system.

In addition, although slight improvements in the efficiency of EEO record-keeping in managerial performance appraisals are evident moving from 1985 to 1987, much more needs to be done to raise the level of documentation and compliance to adequate levels. Some installations, like Fort Belvoir, with the support of the installation command, have instituted major reforms in EEO

performance standards, good rating criteria, documentation of EEO accomplishments and general EEO record-keeping.

The problem of identifying EEO accomplishments in managerial performance appraisals extends to each of the three management classifications included in the study. As Table 32 clearly indicates, for the SFS, GM and FWS managers taken together, only 26.2% of their performance records for the three study years clearly indicate whether or not EEO accomplishments are indicated in their performance records. Some of the records in the "Not Applicable" category are attributable to those years in which the employee had not achieved managerial status. Other records were not available. But the 421 records in the "Not Ascertainable" category clearly suggest that EEO record-keeping is inadequate at most installations. If the record of managerial achievements in EEO is lacking in substance or documentation, it is difficult to advance EEO at lower levels of the military and defense units.

Not only must the criteria for overall managerial accomplishments in EEO be more carefully established, but such accomplishment must be clearly indicated in each of the eight principal areas of EEO to achieve "Outstanding," "Highly Successful," "Exceptional," or "Exceeds Fully" ratings. The EEO areas of recruitment and selection, promotion, training, awards/incentives, speedy resolution of EEO complaints, separations/terminations, disciplinary actions, community outreach are clear categories of attainment.

Although budgetary, organizational or other constraints may legitimately impede performance in one or more of these categories, attainment is usually possible in some categories.

b. Summarizing the Results of Managerial Performance
Records

Managerial performance records were not always available or complete. A little more than one-third of the records reflect EEO as a separate element. Two installations include EEO as a subelement of a human resources element. One base had no standing for EEO as an element or subelement. EEO is not clearly established as a critical element in performance appraisals. Many records did not clearly indicate what status is accorded EEO.

Performance standards are minimal for most managerial performance appraisals at the study installations. Managers were often unsure what to indicate as EEO accomplishments in fulfillment of EEO performance standards. Little reference was made to the eight categories of affirmative action as a baseline performance standard.

In spite of the absence of an EEO performance standard and the unclear status of EEO as either a separate rating element or a critical element, managers were generally rated "Exceptional," "Outstanding," "Highly successful," or "Exceeds Fully" in their EEO ratings. Although some of the ratings reflect some overall rating inflation, these are generally not based on rigorous performance standards and often reflect the absence of serious

charges of racial or gender discrimination and not proactive EEO achievements.

More than eighty percent of the study installations maintain a less than satisfactory application of EEO rating standards. Without a clear performance standard to guide documentation of managerial EEO accomplishments, progress toward the achievement of affirmative action goals by managers is difficult to determine.

The problems of establishing EEO as a separate critical element with clear performance standards cuts across the managerial classifications in the study. The SES, GM and FW all reflect generally low levels of documented EEO achievement. Since less than thirty percent of their records are clear about their levels of EEO accomplishment, it is difficult to discern exemplary EEO practices or to detect issues of EEO enforcement across managerial classification.

Good performance appraisal records should not only provide the basis for EEO policy enforcement but should also be rewarded. Managerial excellence in EEO is a clear signal to the entire workforce that DOD takes affirmative action seriously. Good EEO practices should also generate good training material for existing and prospective SES, GM and FWS managers. Better EEO standards and documentation will generate more substance for EEO training and development.

RECOMMENDATIONS
ENHANCING EEO ACCOUNTABILITY IN DOD

1. Introduction

The major findings of this study at the DOD service headquarters include a strong existing base of policies and procedures at the DOD, service headquarters and at most installations. Recommendations proposed in this study are designed to build upon that base. Recommendations are developed for both the DOD and service levels. They include a review of the existing policies and practices, the strengths and weaknesses of existing policies and a proposed policy or procedural alternative.

Research team guidelines for developing recommendations included:

- (A) Recommendations should make every effort to expand on or extend existing EEO policies;
- (B) Recommendations should reach a clear level of understanding and specificity to encourage compliance;
- (C) Recommendations should be cost-effective;
- (D) Recommendations should be implemented at the service and installation levels through adequate briefing of command and managerial officials; and
- (E) Recommendations should foster cooperation and teamwork among federal employees and should avoid conflict and polarization.

2. Fostering Attitudinal Change

Clearly EEO accountability stimulates concern, conflict, foreboding and defensiveness in too many DOD offices and military installations. Many managers believe that any EEO questions directed toward them are designed to criticize them for poor policy compliance or performance on the EEO critical element. Conversely, much has been done to promote racial and gender equality at these installations. Many managers not only take EEO requirements seriously in the performance appraisal process but have developed creative and constructive ways of accomplishing EEO objectives.

Consequently, a first and most important step to constructively accomplish EEO accountability is to convene a DOD-sponsored workshop on creative inclusion of EEO in managerial performance appraisals for commanding officers, civilian personnel, chiefs and EEO directors at Army, Navy, Air Force and Marine military installations. Four essential components should constitute the workshop:

- A. Review and discussion of current DOD and military departments, EEO/performance appraisal requirements. Under the leadership of the Assistant and Deputy Assistant Secretaries for Civilian Employment and EEO and with the assistance of the DEOC, we reiterate that this policy briefing should include all installation commanders, EEO officials, and civilian personnel managers. The objective of this activity is to update

managers on EEO/performance appraisal requirements, emphasis and the best ways and means of fulfilling these requirements. The ambience for the workshop should be informal, cooperative and creative. But all affected managers and officials should be encouraged to participate.

- B. In advance of this meeting, documentation of useful, innovative or model ways of incorporating EEO into managerial performance appraisals should be encouraged in all DOD and military units. The objective of this activity is to develop a resource bank for managers, beginning with the workshop.
- C. Identification of appropriate awards or incentives for creative compliance with EEO/performance appraisal policies. Beyond what rewards are now provided, this objective is designed to show managers what DOD regards as excellence in EEO compliance.
- D. Review of the adequacy of performance standards for EEO. The objective of this activity is to strengthen and make clearer what EEO actions are expected of managers in the eight categories of compliance. Work on performance standards would focus discussion on what is and is not feasible given the current budgetary, personnel and organizational context of DOD and the military installations.

Such a workshop should precede implementation of subsequent recommendations in this report. The workshop aims to prepare managers for EEO/performance appraisal reforms in a constructive and proactive manner.

3. System-wide Recommendations

DOD Directive 1440.1 provides the appropriate policy framework for enhancing EEO in managerial performance appraisals. It makes the policy applicable to all DOD units and all military departments and installations. It is employed at most military installations as the basis for installation-level policies. However, more extensive policy guidelines are necessary to assure the incorporation of EEO in management performance appraisals. These guidelines should include the following elements:

- (A) DOD units and military installations should be required to establish EEO as a separate and critical element in the performance appraisals of all managers with clear supervisory responsibilities;
- (B) As a separate and critical element, the EEO performance standard should include:
 - (1) EEO objective reflecting DOD or installation affirmative action goals or objectives;
 - (2) Measurable accomplishments in each of the eight affirmative action categories---
recruitment/selection, promotion, training,
awards/incentives, speedy complaint resolution,
separations/terminations, disciplinary actions and

community outreach. The measurement criteria for each category of accomplishment should reflect the agency's goals, targets in each category and constraints. But anticipated ratings for levels of accomplishment in each category should be specified by management.

(3) Clearly defined requirements for documentation for EEO accomplishments. These should include not only the self-assessment of the rated manager but also corroborating information from other sources, including peers, EEO officers or councils and, where pertinent, outside agencies.

(4) Stronger performance standards should be developed with and not just for managers who are to be rated. Managerial input is essential to the working of the performance review process.

(C) Routine briefings, discussion and orientations on EEO should be required of all managers. Managers who supervise managers should provide a thorough in-person briefing on EEO performance appraisals for all new and existing managers; should discuss progress and problems of EEO compliance with managers at least twice in each performance rating period and should notify subordinate managers of any significant changes in affirmative action goals and objectives that will change expectations of EEO performance by managers. EEO

communication will generally encourage more effective compliance.

(D) EEO should be given equal weight with other performance critical elements. Regardless of what the level of managerial EEO accomplishment for a given rating period is, EEO should be held as equally essential to the accomplishment of agency or unit mission as other critical performance elements.

(E) Enforcement measures for assuring complete inclusion of EEO in managerial performance appraisals should be clearly articulated. Among these measures, the following specific actions should be mandated:

- (1) Review authority given to the DOD Assistant Secretary for Civilian Employment and EEO for any management performance appraisal should be maintained with continued responsibility to refer compliance issues to the Equal Employment Opportunity Commission, or other appropriate federal agencies.
- (2) No manager should be given a rating of "Outstanding," "Fully Successful," or any other high rating without obtaining at least a "Fully Successful EEO rating."
- (3) EEO officials should be empowered to conduct an annual review of EEO incorporation in managerial performance appraisals by closely examining a

sample of performance appraisal and reporting the results directly to both civilian personnel officers at the installation and the DOD Assistant Secretary for Civilian Employment and EEO.

- (F) More extensive and systematic managerial EEO training is essential. The recommended modes of training include:
- (1) EEO workshops for new managers;
 - (2) Courses on managing diverse workforces sponsored by OPM Executive Seminar Centers, the Federal and Government Executive Institutes and at all federal regional offices.
- (G) Only findings of racial, gender and disability discrimination, as well discrimination on the basis of religion, national origin, and age, should adversely impact on the performance rating of managers. No manager should receive a high overall performance rating with a finding of discrimination in his or her record. However, every effort should be made to counsel and rehabilitate the offending manager with training so as to prevent future offenses.
- (H) The prevention of sexual harassment should be included as a component of the EEO critical element. The performance standard for this activity includes documentable efforts of the manager to sensitize themselves and subordinates to sexual harassment

issues, immediate and effective intervention when sexual harassment problems emerge and referrals to appropriate assistance for employees with potential sexual harassment behaviors.

- (I) EEO performance appraisals need to be tied much more directly to agency, unit and installation affirmative action goals and objectives. First, affirmative action goals and objectives need to be clearly articulated on an annual basis by the highest ranking official in the unit. Second, they need to be communicated through memoranda, briefings and discussions from managers to subordinate managers. Third, performance expectations need to be generated from affirmative action goals and objectives. Consequently, these expectations would be translated into quantitative and qualitative measures clearly understandable to both managers and the managers they supervise. Fourth, EEO ratings should be based primarily, if not exclusively, on these articulated expectations.
- (J) Performance appraisal record-keeping, particularly with respect to EEO performance, needs to be greatly improved. Without good record-keeping, the measurement of managerial progress in accomplishing EEO expectations is greatly impeded. Moreover, the quality of record-keeping, particularly the documentation of the EEO accomplishments of managers, can greatly expand

the capability of units to identify and to share examples of exemplary EEO performance.

(K) A more frequent and systematic effort should be made by agency leaders and personnel officials to collect recommendations of managers for improving EEO performance. Managers have many innovative suggestions for enhancing EEO compliance for improving the documentation and use of their own EEO accomplishments. These recommendations should be encouraged and rewarded.

(L) External gender and minority professional and occupational organizations and associations should be used to help agencies to formulate and implement EEO performance standards for managers. Examples of these organizations include the National Organization of Women, the Conference of Minority Public Administrators (American Society for Public Administration), the National Urban League, and Blacks in Government (BIG). These organizations include substantial numbers of female and minority federal employees, including managers. They can be instrumental in the formulation of effective strategies for evaluating managerial EEO performance.

4. Service-level Recommendations

In addition to the aforementioned (DOD) system-wide recommendations, service-level recommendations for the Air Force, Army and Navy are also proposed. The objective of these recommendations is to address issues that the research team observed during the site visits or derived from an intensive review of managerial performance appraisal records. These recommendations should be combined with those recommendations made earlier at the DOD level.

A. Department of the Air Force

Andrews Air Force Base and Bolling Air Force Base were the two Air Force installations visited. The July 1, 1984 Air force regulation requiring the establishment of an EEO element in managerial performance appraisals for all units of the Air force is an excellent beginning. However, the policy does not clearly establish EEO as a separate critical element in managerial performance appraisals. Moreover, performance standards do not include the eight standard affirmative action categories or reference to installation-level affirmative action objectives.

In addition, the enforcement authority of the EEO officers at Andrews and Bolling is vague. It is not clear that they are authorized to review and make recommendations about the quality of EEO performance components in managerial appraisals; to conduct briefings and plan training in conjunction with

installation command and personnel officers or to otherwise improve EEO enforcement.

Finally, although installation commanders at both bases have orally expressed their support of the principles of EEO, more active and rigorous command leadership is needed to encourage implementation of the specifics of the AAP to managerial responsibilities in order to ensure that all managers are rated on an EEO critical element.

B. The Department of the Army

Army installations operate under the most detailed and comprehensive policies for including EEO in managerial performance appraisals. Army policy provides for direct EEO officer involvement in managerial ratings and in determining which managers should and should not be rated on EEO performance. Operating procedures for EEO performance ratings include clear performance standards, follow-up actions, reporting requirements, frequent meetings, good record-keeping and administrative support for all aspects of EEO-related activities. Documentation requirements for managerial EEO performance are detailed in a clear manner. Equal Employment Opportunity Managers (EEM) are given clear responsibilities to monitor overall EEO compliance and to ensure EEO performance evaluation of supervisors.

Although the jurisdiction of the civilian personnel official and the EEO official at Fort Belvoir is limited, EEO is a clear and strong commitment of the base commander and is actualized

throughout the managerial hierarchy. As a result, the authority of EEO officer to assist in the enforcement of performance expectations of managers is enhanced.

However, Army policy needs to be more detailed about the managerial EEO accomplishment in each of the eight categories of affirmative action. These accomplishments also need to be closely related to affirmative action goals and objectives of each Army installation on an annual basis. Finally, more EEO training would be useful to thoroughly familiarize managers with rating expectations in EEO.

C. The Department of the Navy

The Department of the Navy has established EEO as a critical element for most managerial performance appraisals. However, the Performance Appraisal Review System (PARA form) does not list EEO as a critical element. Moreover, Navy does not require an SES separate critical element for EEO but does list it as a desirable SES objective. Most importantly, the Alternative Performance Appraisal System (APAS) fails to establish EEO as a separate element in its evaluation of GM, and FWS managers. EEO is included as a subelement in the Human Resources Critical Element of APAS. Although the objective of this methodology in APAS is to improve the efficiency and effectiveness of Navy managerial performance reviews given the eight categories of possible affirmative action accomplishment and the recommendation of this report that the prevention of sexual harassment be added to EEO,

the EEO element is too differentiated and complex to be submerged as a subelement in managerial appraisals.

Our review of NAVFAC performance appraisals indicates that EEO accomplishments were generally not indicated or were not clear. It is also evident that rating managers were not entirely sure how to handle the EEO subelement for rated managers under APAS. Consequently, we urge the establishment of a separate, critical element for EEO with its own performance standard based on the eight categories of EEO attainment.

Finally, it is our strong recommendation that the Department of the Navy work very closely with the Marine Corps in the development and implementation of strong EEO managerial performance appraisal program. Our review of the management performance records and managerial interviews at Quantico indicated a virtual absence of guidelines establishing EEO as a separate critical element in managerial performance appraisals. Without such guidelines, EEO managerial accountability at Quantico will be difficult to attain.

5. Summary of Principal Recommendations

Critical elements should have rigorous performance standards tied to organizational Affirmative Action Plans and decisions for results-oriented ratings in order to yield an improved EEO performance.

Specifically:

- (a) Convene a workshop on constructive ways and means of encouraging EEO accountability among managers;
- (b) Make EEO a separate and critical element in managerial performance appraisals;
- (c) Strengthen performance standards so that they are measurable and provide the basis for managerial ratings;
- (d) Managers and their supervisors need more communication more often about EEO performance expectations;
- (e) Give EEO critical elements equal weight with other critical elements in rating management performance;
- (f) Documentation of EEO performance in managerial appraisals needs strengthening and should be directly tied to unit and agency affirmative action goals and objectives;
- (g) No manager should receive a high rating with no or poor EEO performance;
- (h) More EEO training and education is necessary both on-site and at established federal training facilities;
- (i) Findings of racial, gender discrimination or discrimination against persons with disability should be documented in managerial performance appraisals, but should provide the basis for development or rehabilitation of the offending manager;

- (j) The prevention of sexual harassment should be included in the EEO critical element;
- (k) Performance appraisal record-keeping should improve;
- (l) External minority and women professional organizations or professional organizations representing persons with disabilities should be used as a resource in advancing the inclusion of EEO in managerial performance appraisals.

TABLES

Table 1
The Distribution of Installations with EEO
as a Critical Element or Subelement

Installation	Separate Element	Subelement	No Element	Don't Know	Total
Army Material Command	36	2	2	0	40
Bolling Air Force Base	12	5	9	0	26
Defense Logistics Agency (Headquarters)	12	4	2	0	18
Defense Logistics Agency (Administrative Support Center)	2	8	0	0	10
Fort Belvoir	17	0	0	0	17
Naval Facilities Command	3	10	11	1	25
Quantico Marine Corp Base	5	4	1	0	10
Andrews Air Force Base	8	5	15	1	29
Total	95	38	40	2	175

Table 2
Did Supervisors Discuss EEO Standards with Managers?

Installation	Yes	No	Total
Army Materiel Command	30	7	37
Bolling Air Force Base	11	6	17
Defense Logistics Agency (Headquarters)	13	3	16
Defense Logistics Agency (Administrative Support)	6	4	10
Fort Belvoir	17	0	17
Naval Facilities Command	9	5	14
Quantico Marine Corp Base	7	2	9
Andrews Air Force Base	9	6	15
Total	102	33	135

Table 3
EEO Element/Subelement Weighting

Installation	Less Weight	Equal Weight	More Weight	Don't Know	Total
Army Material Command	6	25	6	0	37
Bolling Air Force Base	0	14	1	2	17
Defense Logistics Agency (Administrative Support)	3	6	0	1	10
Defense Logistics Agency (Headquarters)	4	12	0	0	16
Fort Belvoir	2	13	2	0	17
Naval Facilities Command	5	7	1	1	14
Quantico Marine Corp Base	1	8	0	0	9
Andrews Air Force Base	2	10	1	2	15
Total	23	95	11	6	135

Number of Respondents = 135

Table 4
Use of Narrative Documentary Evidence to Support EEO Ratings

Installation	Yes	No	Don't Know	Total
Army Materiel Command	31	4	2	37
Bolling Air Force Base	11	3	3	17
Defense Logistics Agency (Administrative Support)	2	6	2	10
Defense Logistics Agency (Headquarters)	6	9	1	16
Fort Belvoir	14	2	1	17
Naval Facilities Command	7	6	1	14
Quantico Marine Corp Base	6	2	1	9
Andrews Air Force Base	8	6	1	15
Total	85	38	12	135

Table 5

The Affirmative Action Accomplishments of Managers

Installation	Recruitment	Hiring	Promotions	Training	Upward Mobility Program	Awards	Fairness in Disciplinary Actions	None	Don't Know	Other
Army Materiel Command	16	24	13	24	16	11	7	0	0	0
Bolling Air Force Base	1	2	4	6	5	7	6	6	0	0
Defense Logistics Agency (Administrative Support)	4	8	8	7	7	6	7	1	0	0
Defense Logistics Agency (Headquarters)	5	8	9	4	3	6	0	2	0	1
Fort Belvoir	8	11	7	10	10	2	2	0	0	3
Naval Facilities Command	1	4	2	2	2	2	0	3	0	4
Quantico Marine Corp Base	1	0	1	6	4	0	0	0	0	2
Andrews Air Force Base	7	5	1	3	4	0	0	4	0	0
Total	43	62	45	62	51	34	22	16	0	10

Table 6
Are Accomplishments Recorded in the EEO Performance Appraisals?

Installation	Yes	No	Hesn't Done Anything	Other	Total
Army Materiel Command	25	8	2	0	35
Bolling Air Force Base	5	3	6	0	14
Defense Logistics Agency (Administrative Support)	6	3	1	0	10
Defense Logistics Agency (Headquarters)	8	4	2	2	16
Fort Belvoir	16	1	0	0	17
Naval Facilities Command	7	5	2	0	14
Quantico Marine Corp Base	8	1	0	0	9
Andrews Air Force Base	6	5	4	0	15
Total	81	30	17	2	130

Table 7
Impact of a Filing of EEO Complaint on Performance Appraisals

Installation	Great Deal	Some	Not Very Much	None	Depends	Total
Army Materiel Command	3	5	4	20	8	40
Bolling Air Force Base	3	4	3	12	4	26
Defense Logistics Agency (Administrative Support)	0	2	2	3	3	10
Defense Logistics Agency (Headquarters)	1	3	3	11	0	18
Fort Belvoir	1	3	1	11	1	17
Naval Facilities Command	0	5	2	10	8	25
Quantico Marine Corp Base	2	3	0	5	0	10
Andrews Air Force Base	5	5	4	11	4	29
Total	15	30	19	83	28	175

Table 8
Impact of a Finding of Discrimination on Performance Appraisal

Installation	Great Deal	Some	Not Very Much	None	Depends	Don't Know	Total
Army Materiel Command	28	5	2	1	7	0	43
Bolling Air Force Base	18	4	0	1	3	0	26
Defense Logistics Agency (Administrative Support)	6	0	0	0	3	1	10
Defense Logistics Agency (Headquarters)	8	4	0	0	6	0	18
Fort Belvoir	14	1	0	1	2	0	18
Naval Facilities Command	16	3	1	1	5	0	26
Quantico Marine Corp Base	9	1	0	0	0	0	10
Andrews Air Force Base	20	4	0	0	0	0	24
Total	119	22	3	4	26	1	175

Table 9
Make Prevention of Sexual Harassment as an EEO Subelement

Installation	Yes	No	Depends	Don't Know	Total
Army Materiel Command	21	17	1	1	40
Bolling Air Force Base	16	9	0	1	26
Defense Logistics Agency (Administrative Support)	5	5	0	0	10
Defense Logistics Agency (Headquarters)	11	7	0	0	18
Fort Belvoir	11	5	1	0	17
Naval Facilities Command	14	9	2	0	25
Quantico Marine Corp Base	6	3	1	0	10
Andrews Air Force Base	15	13	1	0	29
Total	99	68	6	2	175

Table 10
Recommendations for Enhancing EEO

	ANC	Bolling	DLA Admin Supp	DLA HG	Fort Belvoir	NAVFAC	Quantico	Andrews	Totals
Training & Information	10	9	3	3	2	7	4	2	40
Support & Enforcement by Managers	9	3	3	4	3	1	4	3	30
System Works Well Enough	6	2	3	2	7	6	3	3	32
More Documentation	0	1	2	1	0	0	0	3	7
Well Developed Goals for Unit	4	1	1	1	1	0	1	7	16
Give Equal Weight to EEO Element	1	2	1	1	0	2	0	0	7
Incentive Awards	1	1	2	2	1	0	0	2	9
Review of Overall Objectives of the Performance Appraisal System	2	1	2	0	0	1	0	4	10
No Recommendations	3	3	0	4	5	1	1	5	22
Don't Know	1	2	0	1	2	1	0	0	7
Other	9	6	1	7	7	8	1	9	48

Table 11

EEO Element by Pay Plan

Rank	Separate Element	Part of Another Element	No EEO Element	No Element Not Supervisor	Don't Know	Total	N
SES	70%	25%	5%	0%	0%	100%	20
GM	53%	21.6%	13.4%	10.5%	1.5%	100%	134
FWS	47.6%	19%	33.4%	0%	0%	100%	21

Table 12

Percentage of Managers with
whom Supervisors had EEO
Discussions

Total	Yes	No	N
SES	89.5%	10.5%	19
GM	73.5%	26.5%	102
FWS	47.6%	52.4%	14

Table 13

Relative Weighting of EEO
and Other Performance Elements

Total	Less	Equal	More	Don't Know	Nothing
SES	15.8	73.7	10.5	0	19
GM	19.7	68.6	7.8	3.9	102
FWS	0	78.6	7.1	14.3	14

Table 14

**Impact of a Filing or Finding of Racial/Gender Discrimination
On Managerial Performance Appraisals**

Managerial Rank	Great Impact		Some Impact		Not Very Much		None		Depends		Total
	Filing	Finding	Filing	Finding	Filing	Finding	Filing	Finding	Filing	Finding	
SES	5%	55%	25%	5%	15%	0%	35%	0%	20%	40%	20
EN	7.5%	67.9%	15.7%	14.9%	10.4%	8%	51.5%	14.9%	16.4%		134
FMS	19%	76.2%	19%	9.5%	0	33.5%	4.8%	19%	9.5%		21

Total

175

Table 15

Should Sexual Harassment be Part of EEO?

Mgt. ¹ Class	Yes	No	Other	Total
SES ²	10	9	1	20
GM ³	75	52	6	134
FWS ⁴	14	6	1	21
Total	99	67	8	174

Acronym Legend

1. Management Class
2. Senior Executive Service
3. General Management
4. Federal Wage System Supervisor

Table 16

Views of Men and Women Managers on the
Inclusion of Sexual Harassment in the EEO Element

Gender	Yes	No
Males	55.6%	44.4%
Females	54.5%	45.5%
	100%	100%

Table 17

Men and Women Managers in the EEO Study

Men	141
Women	33
Total	174

Table 18

Manager/Supervisor EEO Discussions, by Gender

Gender	Discussions Held	Discussions Not Held
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Male	53.3%	44.7%
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Female	57.5%	42.5%
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Table 19

Male/Female Manager Views on the Impact of
A Finding of Discrimination on Performance Appraisals

Gender	Should Have Great Impact	Other Views
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Male	72.1%	27.9%
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Female	39.3%	60.7%
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Table 20

Distribution of EEO as a Separate Element, by Race

Total	Race	EEO a Separate Element	EEO not a Separate Element	Non-Ascertainable
24	Black Managers	12 (59%)	5 (20.8%)	7 (29.2%)
144	White Managers	81 (56.2%)	29 (20.1%)	34 (23.6%)
168		93 (55.3%)	34 (20.2%)	39 (23.2%)

Table 21

Supervisor EEO Discussions with Managers, by Race

Race	Yes	No	Not Ascertainable	Total
Black Managers	11 (45.8%)	6 (25%)	7 (29.2%)	24
White Managers	78 (54.1%)	27 (18.8%)	29 (20.1%)	144

Table 22

Distribution of Managers' View on Impact of a
Finding of Racial Discrimination on Performance Review, by Race

Race	Great Impact	Some Impact	Not Very Much Impact	No Impact	Depends	Total
Black Managers	19 (79.1)	1 (4.2%)	--	--	4 (16.7%)	24
White Managers	94 (65.3%)	21 (14.6%)	1 (.07%)	2 (1.4%)	26 (18.1%)	144
Total	113 (67.3%)	22 (13.1%)	1 (0.6%)	2 (1.2%)	30 (17.8%)	168

Table 23

Managers' Views on Inclusion of Sexual Harassment
in EEO Element, by Race

Race	Yes	No	Depends	Total
Black Managers	15 (62.5%)	8 (33.3%)	1 (4.2%)	24
White Managers	79 (54.7%)	54 (37.5%)	11 (7.6%)	144
Total	94 (56%)	62 (36.9%)	12 (7.1%)	168

Table 24

Distribution of Managerial Performance Appraisals
on EEO Indicated as a Separate Element

	Yes	No
#1 AMC	202	27
#2 Ft. Belvoir	33	6
#3 Andrews	30	222
#4 Bolling	3	70
#5 NAVFAC	50	221
#6 Quantico	46	40
#7 DLA-HQRS	34	96
#8 DLA-ADM	10	66
	408 (35.3%)	748 (64.7%)

Total Records: 1,156

Table 25

Distribution of Managerial Performance Appraisals
on EEO as a Critical Element

	Yes	No	Inapplicable
#1 AMC	172	2	55
#2 Ft. Belvoir	29	0	10
#3 Andrews	49	9	194
#4 Bolling	2	1	70
#5 NAVFAC	41	8	223
#6 Quantico	43	1	42
#7 DLA-HQRS	34	0	96
#8 DLA-ADM	10	0	66
	380 (32.8%)	21 (1.8%)	756 (65.3%)

Total Records: 1,157

Table 26

EEO as Part of Another Element
in Performance Records

	Yes	No	Inapplicable
#1 AMC	6	20	203
#2 Ft. Belvoir	0	6	33
#3 Andrews	30	185	37
#4 Bolling	18	52	3
#5 NAVFAC	10	212	50
#6 Quantico	9	31	46
#7 DLA-HQRS	18	78	34
#8 DLA-ADM	45	21	10
136 (11.7%)	605 (52.3%)	416 (36%)	

Total Records: 1,157

Table 27

Performance Standards (EEO-PS)
in Managerial Performance Appraisals

	Yes	No	Inapplicable
#1 AMC	3	18	208
#2 Ft. Belvoir	0	6	33
#3 Andrews	34	147	71
#4 Bolling	12	40	21
#5 NAVFAC	30	183	58
#6 Quantico	12	20	54
#7 DLA-HQRS	41	35	53
#8 DLA-ADM	16	5	55
	148 (12.8%)	454 (39.3%)	553 (47.9%)

Total Records: 1,155

Table 28

EEO Performance Ratings in
Managerial Performance Appraisals

	Exceptional or Outstanding	Highly Successful or Fully Exceeds	Fully Successful	Marginal or Minimal Successfully/ Satisfactory	Unsatisfactory or Unacceptable	Not Ascertainable	Inapplicable
#1 ANC	96	75	30	0	0	0	19
#2 Ft. Belvoir	29	1	3	0	0	0	6
#3 Andrews	56	6	38	0	0	0	152
#4 Bolling	28	0	5	0	0	0	40
#5 NAVFAC	35	33	19	0	0	0	184
#6 Quantico	29	21	11	4	1	0	20
#7 DLA-HQRS	60	23	13	0	0	0	34
#8 DLA-ADM	21	35	15	0	0	0	5
	354 (30.6%)	94 (17%)	134 (12.3%)	4 (.03%)	1	0	460 (40.1%)

Total records = 1,147

Table 29

The Rigor of the EEO Performance Standard

	Rigorous	Satisfactory	Weak	Not Ascertainable	Inapplicable
#1 AMC	10	67	51	82	19
#2 Ft. Belvoir	0	2	0	31	6
#3 Andrews	1	10	90	1	150
#4 Bolling	0	3	30	0	40
#5 NAVFAC	2	16	71	0	183
#6 Quantico	9	25	32	0	20
#7 DLA-HQRS	10	34	52	0	34
#8 DLA-ADM	1	21	49	0	5
	33	178	375	114	457

Total records: 1,157

Table 30

Documentation of
EEO Accomplishments/Results in Managerial Performance Appraisals

	Yes	No	Not Ascertainable	Inapplicable
#1 AMC	52	51	106	20
#2 Ft. Belvoir	1	0	32	6
#3 Andrews	24	15	63	150
#4 Bolling	12	2	19	40
#5 NAVFAC	32	17	40	183
#6 Quantico	38	22	6	20
#7 DLA-HQRS	13	8	74	35
#8 DLA-ADM	0	0	71	5
	172(14.9%)	115 (9.9%)	411(35.5%)	459 (39.7%)

Total Records: 1,157

Table 31

Distribution of EEO Accomplishments by Management Rank (Pay Plan)

Management Status	Not Applicable	Yes	No	Not Ascertainable	Total
Not Indicated	15	6	2	23	46
FWS	27	13	7	15	62
GM	389	148	93	372	1002
SES	7	12	10	11	40
Total	438 (38%)	179 (15.6%)	112 (10.6%)	421 (36.6%)	1150

CHARTS

Chart I.

Summary of Principal Recommendations for Enhancing EEO Accountability: System-wide Recommendations (DOD)

Strengths	Weaknesses	Proposed Alternatives
Specifies EEO as a critical element for managerial performance	Does not specify EEO as a <u>separate</u> critical element	Amend 1440.1 to specify EEO as a separate critical element in managerial performance appraisals
Makes 1440.1 applicable to all DOD offices and military departments	Does not specify duty of commanding officer or unit chief for enforcing policy EEO policy briefings and discussions sporadic	Amend 1440.1 to make chief or command responsible for enforcement through civilian personnel office Require EEO briefings for all new and existing managers to be rated on EEO performance
	Performance standard unclear about documentary support	Require clear documentary support for all EEO rating
	Managerial EEO performance expectations not explicitly tied to DOD or agency affirmative action goals or objectives	Rating managers should tie EEO performance requirements and ratings to goals and objectives of agency
	EEO not indicated as a staff development or training activity	Incorporate EEO in agency and federal training and staff development plans
	Managers receive highest ratings without EEO accomplishments	No manager should receive highest performance rating without at least a "Fully Successful" on EEO

Chart I. (Continued)

Strengths	Weaknesses	Proposed Alternatives
Gender included in current EEO policy	Findings of racial discrimination do not automatically go into managerial performance appraisal	Findings should go into performance rating; remedial plan mandatory
	Prevention of sexual harassment not included as part of EEO critical element	Formally include prevention of sexual harassment as part of EEO critical element
	No current reporting process to agency head on progress of managers in performing EEO responsibilities	Through EEO officer, require annual report of manager progress in performance of EEO responsibilities
	Record-keeping on managerial EEO performance uneven and dated	Command or chief should indicate clear EEO record-keeping standards
	Under "community outreach" element in EEO, use of external gender and minority organizations limited	Use external gender and minority organizations to enhance managerial EEO performance
Make DOD officials ultimately responsible for enforcement of EEO policy on managerial performance appraisal project	Not explicit about review authority for enforcement of EEO managerial performance appraisal requirements	Establish clear review authority for enforcing inclusion of EEO in appraisals

Chart II.

Summary of Principal Recommendations for Enhancing EEO Accountability: Department of the Air Force

Strengths	Weaknesses	Proposed Alternatives
Air force committed to DOD directive 1440.1; July 1, 1984 Regulation requires EEO element in managerial performance appraisals	Does not clearly establish EEO as a separate, critical element in managerial performance appraisals	Specify EEO as a separate, critical element in all managerial performance appraisals
EEO performance standard required	Performance standard does not include eight EEO categories or documentation aligned to affirmative action objectives	Specify performance in eight EEO categories aligned to affirmative action objectives
EEO councils and officials established	Enforcement authority of EEO officials and councils unclear	Reify enforcement role of EEO officials and council
EEO policies are service-wide	Headquarters to field responsibilities for EEO managerial performance appraisal enforcement unclear	Specify headquarters role in enforcing inclusion of EEO in managerial performance appraisals
	EEO training and staff development unclear	Include EEO in all staff development and training plans and activities

Chart III.

Summary of Principal Recommendations for Enhancing EEO Accountability: Department of the Navy

Strengths	Weaknesses	Proposed Alternatives
EEO defined as a critical element in managerial performance appraisals	For GS, GM and FWS managers reviewed under APAS, EEO not a separate critical element; subsumed under Human Resources Element	Establish EEO as a separate critical element under APAS
Requires EEO objectives for all SES	Fails to establish a separate critical element for EEO for SES Need to establish an entire process for inclusion of EEO in managerial performance reviews for the Marine Corps	Establish a separate EEO critical element for all SES Work closely with Marine Corps to develop policies on EEO in managerial performance reviews

Chart IV.

Summary of Principal Recommendations for Enhancing EEO Accountability: Department of the Army

Strengths	Weaknesses	Proposed Alternatives
EEO established as a separate and critical element in managerial performance appraisals	EEO documentary requirements need more specification	Establish guidelines for documenting managerial EEO accomplishments using eight categories of EEO
Provisions are made for EEO Officer involvement in EEO ratings and determining eligible managers		
Operating procedures for EEO performance ratings include standards, follow-up actions, reporting requirements, frequency of meetings, record-keeping and administrative support		
EEOs are given responsibilities for monitoring overall EEO compliance and for ensuring EEO performance evaluation of supervisors		
DLA policies cognizant of organizational constraints on EEO attainment; require documentation of constraints		

APPENDICES

APPENDIX I

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DEPARTMENT OF DEFENSE -- EEO ACCOUNTABILITY STUDY

MANAGERS/SUPERVISORS QUESTIONNAIRE

Social Security # _____ Installation _____ Case # _____

Gender: ☐ 1. Male ☐ 2. Female

Race/Ethnic Group: ☐ 1. Native American/A ☐ 2. Asian/B
 ☐ 3. Black/C ☐ 4. Hispanic/D
 ☐ 5. White/E ☐ 6. Other

1. Is EEO a separate element in your performance appraisal, is it part of another element, or is EEO not an element at all?
☐ 1. Separate ☐ 2. Part of Another ☐ 3. No EEO Element (GO TO QUESTION 7)
2. Has your supervisor ever discussed with you the standards for evaluating your performance on EEO?
☐ 1. Yes ☐ 2. No
3. How is the EEO element or sub-element weighted in relation to other elements or sub-elements in determining your overall performance? Is it given "less weight", or "equal weight", or "more weight"?
☐ 1. Less Weight ☐ 3. More Weight
☐ 2. Equal Weight ☐ 4. Don't Know
4. Is narrative documentary evidence used to support your EEO rating in the performance appraisal?
☐ 1. Yes ☐ 2. No ☐ 3. Don't Know

5. What have you done to fulfill any aspects of the Affirmative Action Program: such as recruitment, hiring, promotions, training, etc.?

☐ 1. Recruitment ☐ 2. Hiring ☐ 3. Promotions ☐ 4. Training
☐ 5. Upward Mobility Programs ☐ 6. Awards ☐ 7. Fairness in
Disciplinary
Action
☐ 8. Nothing ☐ 9. Don't Know

6. Are these things recorded in your EEO performance appraisal?

☐ 1. Yes ☐ 2. No ☐ 3. Hasn't Done Anything

7. How much impact should the filing of an EEO complaint alleging discrimination by a supervisor have on that supervisor's performance appraisal? Should it have a "great deal of impact", "some impact", "not very much impact", or "no impact at all"?

☐ 1. Great Deal ☐ 3. Not Very Much ☐ 5. Depends
☐ 2. Some ☐ 4. None ☐ 6. Don't Know

- 7a. How much impact should a finding of discrimination have on a supervisor's performance appraisal? Should it have a "great deal of impact", "some impact", "not very much impact", or "no impact at all"?

☐ 1. Great Deal ☐ 3. Not Very Much ☐ 5. Depends
☐ 2. Some ☐ 4. None ☐ 6. Don't Know

8. Should the prevention of sexual harassment in the work place be included as a specific sub-element of the EEO performance appraisal element?

☐ 1. Yes ☐ 2. No ☐ 3. Depends

9. What would you recommend, if anything, to enhance EEO accountability within the performance appraisal system?

☐ 1) Training & Information on EEO
☐ 2) Support & Enforcement of System by Senior Managers
☐ 3) System is Working Well
☐ 4) More Documentation of Accomplishments
☐ 5) Well Developed Goals for Unit
☐ 6) Give Equal Weight to EEO Element
☐ 7) Incentive Awards
☐ 8) Review of Overall Objectives of Performance Appraisal System
☐ 9) No Recommendations
☐ 10) Don't Know
☐ 11) Other _____

DEPARTMENT OF DEFENSE - EEO ACCOUNTABILITY STUDY

PERSONNEL RECORDS FORM

1. Installation/Unit?

1. AMC

2. BELVOIR

3. ANDREWS

4. BOLLING

5. NAVFAC

6. QUANTICO

7. DLA-HEADQUARTERS

8. DLA-ADM. SUPPORT

2. Social Security Number _____

3. Appraisal Year

1. Oct '84-Sept '85

2. Oct '85-Sept '86

3. Oct '86-Sept '87

4. Was the person's race/ethnic group indicated?

1. Yes

2. No

5. Was the person's gender indicated?

1. Yes

2. No

6. Is the person handicapped?

1. Yes

2. No

7. Subject's pay plan

1. SES

2. GM

3. FWS

8. Subject's grade level

9. Subject's occupation series

10. Was EEO a separate element of subject's Performance Appraisal Form?

1. Yes	2. No
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Was it a critical element?	Was EEO part of another element?	
Yes No	Yes	No
	Was that element a critical element?	Was EEO mentioned in any performance standard?
	Yes No	Yes No

11. What was the subject's rating on their EEO element?

1. EXCEPTIONAL or OUTSTANDING	2. HIGHLY SUCCESSFUL or EXCEEDS FULLY	3. FULLY SUCCESSFUL
4. MARGINAL or MINIMALLY SUCCESSFULLY/SATISFACTORY	5. UNSATISFACTORY or UNACCEPTABLE	

12. Were the subject's performance standards for EEO weak, satisfactory or rigorous?

1. Rigorous	2. Satisfactory	3. Weak
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13. Did the subject's accomplishments/results match the EEO performance standard?

1. Yes	2. No	3. Not ascertainable
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DCI
EEO ACCOUNTABILITY STUDY

PERFORMANCE STANDARDS RATING CRITERIA

**PERFORMANCE
STANDARD RATING**

DESCRIPTION

- | | |
|-------------------------|---|
| 1. Rigorous: | Specific, detailed standard covering EEO element at all standard rating levels; assigns measurability/expectations at all standard rating levels. |
| Example: | "Affirmative action goals and objectives established...Uses initiative re implementation of EEO...All actions unbiased...Achievements re EEO evaluated and utilized to adjust affirmative action plan..Under abnormal conditions, balances conflicting priorities and advises management with regard to EEO and intended course of action." |
| 2. Satisfactory: | Detailed standard covering EEO element at all standard rating levels; assigns expectations at all standard rating levels. |
| Example: | "EEO objectives pursued...Wide ranging, thorough search to find qualified minority/female/handicapped candidates for senior vacancies...Agency objectives rigorously pursued...Demonstrable efforts to inform minorities, females and handicapped candidates re logistics and federal careers." |
| 3. Weak: | Vague, minimal standard covering EEO element. |
| Example: | "EEO objectives carried out fully." |

DYNAMIC CONCEPTS INCORPORATED

BACKGROUND

AND

PROJECT TEAM

Background

Dynamic Concepts Incorporated (DCI) is a ten year multi-disciplinary firm providing a wide range of professional services to government and private industry. DCI has completed work for clients engaged in the business of transportation, energy, agriculture, housing, defense and other government and non-government activities. In addition to providing assistance in areas of EEO and Affirmative Action Compliance as recorded in this document, DCI has completed work in such areas as productivity enhancement, legislative impact, rate regulation analysis, automated systems review and other functional areas commissioned by our clients. Specific services include management studies, surveys, training, conference management and ADP system support. DCI has contracts with over 50 different Federal Government Agencies not to include state and local municipalities.

Careful and significant attention is always given to the members of the Project Team for all undertakings. DCI's Project Team Members for this Equal Employment Opportunity in the Department

of Defense: Enhancing Managerial Responsibility Study, are listed below.

Project Team

Dr. Lenneal Henderson
Project Director

Dr. Lenneal J. Henderson served as DCI's Project Director for the Study. He has also served as a Senior Faculty member of the Federal Executive Institute in Charlottesville, VA; Head and Professor in the Department of Political Science at the University of Tennessee, Knoxville; Professor School of Business and Public Administration at Howard University in Washington, DC; Associate Director of Research at the Joint Center for Political Studies and Post Doctoral Fellow at the Johns Hopkins School of Advanced International Studies in Washington, DC. Dr. Henderson served as a Consultant to Equal Employment Opportunity Commission and to Affirmative Action Offices of the State of Maryland, California and Pennsylvania. He has published numerous articles on personnel management, affirmative action and minority employment in such journals as Policy Studies Journal, Public Management, The Annals, Public Administrative Review and several anthologies. Dr. Henderson received his AB, MA and Ph.D degrees from the University of California at Berkeley.

Harry M. Singleton, Esq.
Senior Management Analyst

Harry M. Singleton served as DCI's Senior Management Analyst for this Department of Defense Study. He is the former Assistant Secretary for Civil Rights for the U.S. Department of Education. In that position, he was responsible for the overall operation of the Office for Civil Rights and served as principal adviser to the Secretary of Education on all civil rights issues. Mr. Singleton further served in the Executive Branch as Deputy Assistant Secretary for Congressional Affairs for the U.S. Department of Commerce; Legislative Branch as Republican Chief Counsel and Staff Director for the Committee on the District of Columbia, U.S. House of Representatives; and as an attorney in the office of General Counsel for the Federal Trade Commission in Washington, D.C. His private sector experience includes Associate positions with the Washington, D.C. law firms of Covington & Burling and Houston & Gardner, and served as a legislative consultant with the American Enterprise Institute for Public Policy Research. Mr. Singleton received a B.A. degree from the Johns Hopkins University in 1971 and a J.D. degree from Yale Law School in 1974.

Walter M. Dickerson
Senior Management Analyst

Mr. Walter M. Dickerson has served as DCI's Senior Management Analyst for the project. His extensive experience in personnel management and Equal Employment Opportunity. Mr. Dickerson's EEO and personnel experience spans over forty-one years. He has served both federal and state EEO sectors as well as the private sector. Mr. Dickerson's Federal government EEO experience began shortly after the passage of the Civil Rights Act 1964, with his appointment to the U.S. Equal Employment Opportunity Commission (EEOC) as Coordinator for Investigation in the New Orleans, Louisiana District Office with jurisdiction in the state of Louisiana, Arkansas, Mississippi, Alabama and Tennessee.

Mr. Dickerson held various other positions with the EEOC which included Deputy Director of the Washington, D.C. District Office (1968-1970); Director of the Baltimore District Office (1970-1977); and National Field Manager (1977-1980).

Dr. Deborah M. Robinson
Senior Research Analyst

Dr. Deborah M. Robinson served as DCI's Senior Research Analyst for the project. She has extensive experience in statistical analysis. For example, Dr. Robinson conducted statistical analyses for monograph on the Black Electorate for the Russell Sage Foundation, in New York City. She has served for several years as a Research Associate for the National Black Election Study, she also served as a Research Assistant for the University of Michigan where she worked on a immigration project, and coordinated international conferences for the University of Michigan. Dr. Robinson holds her Ph.D and M.A. from the University of Michigan in Psychology, she has a B.A. in Psychology from Williams College in Massachusetts.