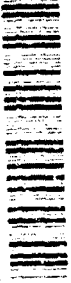


Representatives

March 1991

AD-A263 050



EQUAL EMPLOYMENT

Minority
Representation in
USDA's National
Agricultural Statistics
Service



93-08377



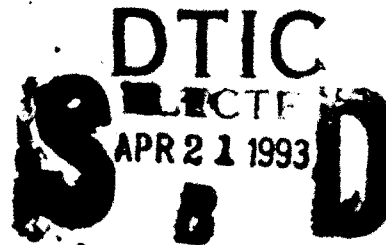
General Government Division

B-242510

March 18, 1991

The Honorable Kweisi Mfume
House of Representatives

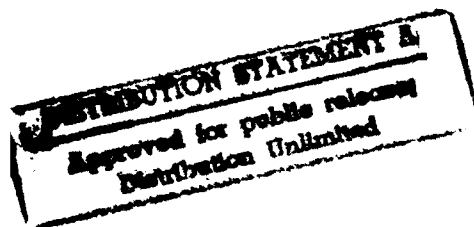
Dear Mr. Mfume:



This briefing report responds to your request on equal employment opportunities in the National Agricultural Statistics Service (NASS), an agency in the U. S. Department of Agriculture (USDA). Your request followed anonymous allegations that NASS discriminated against blacks in selecting employees for its upward mobility program (UMP). In light of these allegations and in response to your request, we agreed to answer four questions:

- Did NASS follow merit promotion procedures when selecting employees for the UMP?
- To what extent have NASS employees filed discrimination complaints regarding the UMP?
- Are minorities fully represented in NASS' work force?
- If minorities are not fully represented, what steps is NASS taking to improve their representation?

In answering the above questions, we obtained information on NASS' merit promotion process and equal employment opportunity (EEO) program but did not evaluate the adequacy of its efforts to address underrepresentation. On August 28, 1990, we briefed your office on the results of our work. This report summarizes and updates information provided at that briefing.



DTIC QUALITY INSPECTED

Background

Accession For	
NTIS GRA&I	☒
DTIC TAB	☐
Unannounced	☐
Justification	
By _____	
Distribution/	
Availability Codes	
Dist	Avail and/or Special
A-1	

NASS reports the prospects for and production of crops, livestock, dairy, and poultry, including things such as labor and weather that affect the agricultural community. In September 1989, NASS had 995 employees, 329 of whom were in its Washington, D.C., headquarters office and the remaining in 45 NASS field offices. Of the 995 employees, 58 percent were in two job series: agricultural statisticians (416 employees) and statistical assistants (164 employees). The remaining 415 were distributed among 26 job series, and none had more than 100 employees.

USDA's Economics Management Staff (EMS), under the Assistant Secretary for Economics, provides management services to NASS and four other USDA economics agencies. These services include assisting NASS with the selection of employees for the UMP on the basis of merit and the

development of affirmative employment program (AEP) plans required by the Equal Employment Opportunity Commission (EEOC).

Under EEOC's Management Directive 714, issued in October 1987, NASS is required to determine whether various EEO groups are fully represented in its work force and develop a 5-year AEP plan addressing underrepresentation.¹ The first step in developing the AEP plan is doing a program analysis of the current status of all affirmative employment efforts within the agency. The program analysis must consist of eight program elements, including an analysis of the agency's work force.

As required by EEOC's directive, NASS is to determine whether underrepresentation exists by comparing each group's representation in the agency's (1) overall work force, (2) major occupational categories, and (3) major job series (those with more than 100 employees) with the representation of the same groups in similar categories and series of the appropriate civilian labor force (CLF). The EEOC directive requires agencies to take actions to address underrepresentation but gives agencies the flexibility to decide what objectives and actions, such as establishing numerical goals, are needed.

As of September 1989, NASS was operating under an AEP plan covering fiscal years 1988 through 1992. The NASS plan was included in an overall USDA plan approved by EEOC in January 1989.

Results

On the basis of a review of case files, we determined that with a few exceptions, NASS and EMS followed merit promotion procedures when selecting employees (six in total) for UMP positions during the period from June 1988 through November 1990. The exceptions were that (1) two positions were advertised for the NASS headquarters commuting area and, under NASS merit procedures, the positions should have been advertised NASS-wide; and (2) some required documentation was not on file for two UMP positions. (See app. I, pp. 12 to 14.)

According to an EMS official and supporting records, NASS had received no formal discrimination complaints involving the UMP from January 1980 through November 1990. EMS records show that four employees

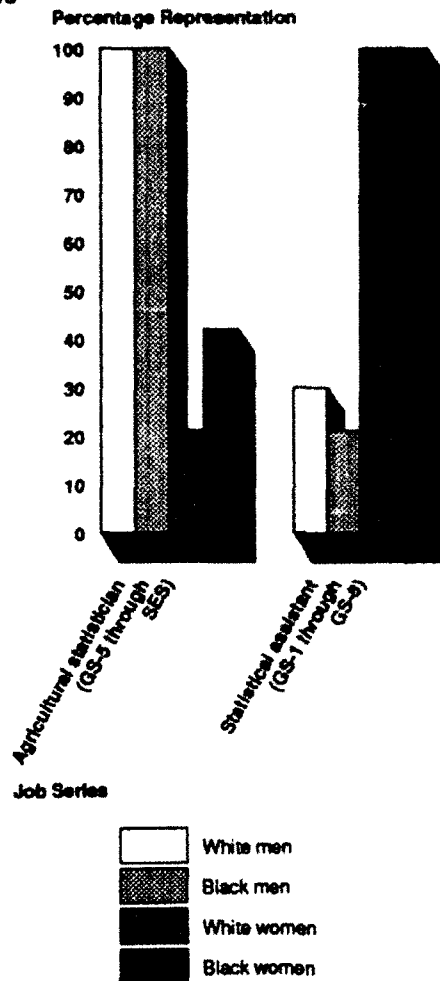
¹EEOC's current guidance does not use the term underrepresentation but instead uses new terms—conspicuous absence and manifest imbalance. Conspicuous absence refers to situations where an EEO group is nearly or totally nonexistent in an agency's work force. Manifest imbalance refers to situations where an EEO group's representation is substantially below its representation in the appropriate civilian labor force.

had sought informal counseling involving the TMP in recent years. An EEO counselor talked with the four employees, and none pursued the allegations beyond this informal counseling. (See app. II, pp. 15 to 16.)

Underrepresentation exists on an overall and occupational category basis within the NASS work force and is most pronounced among Hispanic men and women, white women, and black women in higher paying professional jobs. These four groups, along with white men and black men, accounted for nearly 98 percent of the NASS work force in September 1989. On an overall work force basis, three of these six groups (Hispanic men, Hispanic women, and black men) were underrepresented. Within specific job categories, such as professional, and at general schedule (GS) pay grades 13 and above, more extensive and severe underrepresentation existed, as highlighted below. (See app. III, pp. 17 to 26.)

- NASS employees in the professional job category accounted for 259 (90 percent) of the 288 positions at the GS-13 through senior executive service (SES) pay levels. White men and black men were fully represented in this category. In contrast, the representation of white women and black women in the professional category was 35 percent and 75 percent, respectively, of their representation in the same category of the national CLF.
- More than one-half of NASS' white women and black women employees were in NASS' next largest and lower paying job category, clerical.
- White women and black women were fully represented in this category, whereas white men and black men were underrepresented.
- The imbalance in representation was most conspicuous in NASS' two largest job series, as figure 1 shows.

Figure 1: Representation Imbalances Existed in NASS' Two Largest Job Series as of September 1989



NASS' officials said that a significant barrier to addressing underrepresentation is that its recruitment sources and methods do not produce sufficient numbers of qualified applicants to meet the agency's needs. To overcome this barrier, the plans show that NASS emphasized working with colleges and universities to improve its ability to hire minorities, especially for its agricultural statistician position. NASS also took steps to streamline hiring for this position and some other hard-to-fill positions.

Further, NASS set hiring goals for its four largest job series. NASS met or exceeded the goals it set for some groups in fiscal year 1989. For

example, NASS planned to hire 3 white women as agricultural statisticians and hired 10. It did not always meet the goals set for some under-represented groups and did not set goals for other groups, because NASS officials said they were not able to locate qualified minorities for certain job series. However, NASS did not collect data, such as number of colleges visited and minorities interviewed, on its recruiting activities until fiscal year 1990. NASS also took action to overcome a barrier within the agency, a NASS geographical rotation policy, that it said had a negative impact on retaining women. (See app. IV, pp. 27 to 34.)

Objective, Scope, and Methodology

The objective of our review was to answer the four questions regarding NASS' selection of employees for the UMP and the representation of minorities in the NASS work force. To determine whether NASS followed merit promotion procedures when selecting employees for the UMP, we reviewed (1) the Office of Personnel Management's merit promotion requirements, (2) NASS' January 28, 1983, merit promotion plan requirements, and (3) merit promotion case files for all six employees selected for the UMP during the period from June 1988 through November 1990. We could not review earlier UMP selections because, in accordance with USDA's records management policy, NASS had not retained files for selections made before June 1988.

To determine the extent to which NASS employees have filed discrimination complaints regarding the UMP, we collected data on (1) formal discrimination complaints filed during the period January 1980 through November 1990 and (2) informal discrimination complaints initiated during fiscal years 1989 and 1990. We obtained data on informal complaints from a related USDA report. According to a USDA official, reliable data were not available on informal discrimination complaints initiated before October 1988, when USDA implemented an automated system to track such complaints. Therefore, the data we obtained on informal discrimination complaints were for fiscal years 1989 and 1990.

To determine the extent to which minorities were represented at NASS, we obtained data from the agency on the distribution of all EEO groups in its overall work force and by major occupational category, major job series, and grade level. Following EEOC standards and evaluation techniques, we compared the representation of the EEO groups in NASS' work force as of September 1989 with each group's representation in the national CLF. We focused on the representation of four EEO groups (white men, white women, black men, and black women) because they

accounted for 96 percent of the total NASS work force; six other EEO groups each constituted less than 1 percent.

The CLF data that EEOC had prescribed for use by federal agencies, including NASS, were developed during the 1980 census. We used the 1980 data to compare the representation of the EEO groups in NASS' work force to the national labor force. Because of its age, the 1980 data may not reflect the various EEO groups' representation in the national labor force in 1989. However, the 1980 CLF data were the best available for determining whether underrepresentation existed in NASS' work force.

To identify steps NASS planned to take to improve minority representation, we reviewed its 5-year AEP plan. To determine what steps NASS had taken, we focused on fiscal year 1989 and reviewed the NASS AEP accomplishment report, plan update, and related data for that year. We also interviewed EMS and NASS officials regarding plans and actions to address underrepresentation.

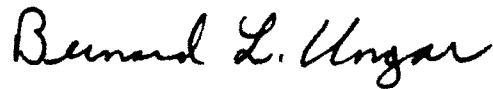
Our review was limited to obtaining information necessary to answer four specific questions. We did not verify the accuracy of work force and discrimination complaint data provided to us. We also did not obtain official agency comments on this report. We did, however, informally discuss the contents of this report with officials at NASS, EMS, USDA, and the EEOC. Officials at each agency generally agreed with the information presented. We made technical changes in the report, where appropriate, on the basis of their comments.

Our review, made during the period from April 1990 through November 1990, was in accordance with generally accepted government auditing standards.

As arranged with you, we plan to distribute this briefing report immediately after its issue date. We will send copies to the Secretary of Agriculture, the Administrator of NASS, and other interested parties.

Major contributors to this briefing report are listed in appendix V. If you have any questions about the report, please call me at 275-5074.

Sincerely yours,

A handwritten signature in cursive script that reads "Bernard L. Ungar".

Bernard L. Ungar
Director, Federal Human Resource
Management Issues

Contents

Letter		1
Appendix I		12
EMS and NASS	NASS Merit Promotion Plan Requirements	12
Complied With Almost	UMP Candidates Were Evaluated and Selected According	13
All Merit Promotion	to Almost All Merit Promotion Procedures	
Procedures When		
Evaluating and		
Selecting Employees		
for the UMP		
Appendix II		15
Few Discrimination	Of 11 Formal Complaints Filed in Almost 11 Years, None	15
Complaints Filed	Involved the UMP	
	Four of 11 Informal Complaints Initiated During 1989 and	16
	1990 Alleged Discrimination in Making Selections for	
	the UMP	
Appendix III		17
Representation of EEO	EEOC's Guidance on Agency Actions to Address	17
Groups in NASS	Underrepresentation	
	Overall Representation of NASS' Work Force as of	19
	September 1989	
	Women Were Underrepresented in Professional	22
	Occupations and Fully Represented in Clerical	
	Occupations as of September 1989	
	White Men Held Most Higher Graded Positions	22
	White Women and Black Women Were Severely	26
	Underrepresented in NASS' Largest Occupational	
	Series—Agricultural Statistician	
Appendix IV		27
NASS' Efforts to	NASS' Strategies Focus on Underrepresentation in	27
Address	Specific Job Series	
Underrepresentation	Actions Taken to Overcome Barriers in the Agricultural	28
	and Mathematical Statistician Job Series	
	NASS' Progress in Achieving Fiscal Year 1989 Numerical	29
	Hiring Goals in Its Four Largest Occupations	

NASS' Experience in Promoting Employees and Making UMP Selections in the Four Largest Occupational Series in Fiscal Year 1989	32
---	----

Appendix V Major Contributors to This Report	35
--	----

Tables	
Table I.1: Extent of Compliance With Merit Promotion Procedures for All Six UMP Positions Advertised in Five Announcements During June 1988 Through November 1990	14
Table II.1: Formal Discrimination Complaints Filed by NASS Employees During Calendar Years 1980 Through 1990, by EEO Group	16
Table III.1: Five EEO Groups Were Fully Represented and Five Were Underrepresented as of September 1989	20
Table IV.1: NASS' Progress in Achieving Fiscal Year 1989 Numerical Hiring Goals in Its Four Largest Occupational Series, by EEO Group	30
Table IV.2: NASS Employees Promoted During Fiscal Year 1989 in the Four Largest Occupational Series, by EEO Group	33

Figures	
Figure 1: Representation Imbalances Existed in NASS' Two Largest Job Series as of September 1989	4
Figure I.1: Compliance with Merit Procedures	12
Figure II.1: Number of Discrimination Complaints About UMP	15
Figure III.1: EEOC Guidance on Actions to Address Underrepresentation	17
Figure III.2: Extent of Underrepresentation in NASS' Overall Work Force	19
Figure III.3: Imbalance in Professional and Clerical Jobs	21
Figure III.4: White Men Held Most of NASS' Positions at Grades 13 and Above	23
Figure III.5: An Imbalance Existed Among EEO Groups at Higher Graded Professional Positions and Lower Graded Clerical Positions	24

Contents

Figure III.6: Representation of Women and Men in NASS' Largest Series	25
Figure IV.1: NASS' Plans and Actions to Correct Underrepresentation	27

Abbreviations

AEP	Affirmative Employment Program
CLF	Civilian Labor Force
EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
EMS	Economics Management Staff
NASS	National Agricultural Statistics Service
SES	Senior Executive Service
UMP	Upward Mobility Program
USDA	Department of Agriculture

EMS and NASS Complied With Almost All Merit Promotion Procedures When Evaluating and Selecting Employees for the UMP

Figure I.1

GAO Compliance With Merit Procedures

NASS Has Identified Steps For Merit-Based Promotions

Six UMP Selections Made During June 1988 Through November 1990

NASS Followed Almost All Required Steps in the Six UMP Selections

NASS Merit Promotion Plan Requirements

Office of Personnel Management regulations dated September 24, 1973, require agencies, such as USDA, to prepare merit promotion plans in order to assure that promotions and selections in the competitive service are made on the basis of merit. USDA requires that each of its component agencies develop merit promotion plans that address the requirements contained in chapter 335 of the Office of Personnel Management's Federal Personnel Manual and that the agencies' plans conform to USDA's overall merit promotion plan.

Appendix I
EMS and NASS Complied With Almost All
Merit Promotion Procedures When
Evaluating and Selecting Employees for
the UMP

We compared NASS' merit promotion plan dated January 28, 1983, with the Office of Personnel Management's merit promotion requirements, and the plan addressed those requirements. Also, according to NASS, the plan complies with USDA's merit promotion plan. The NASS plan prescribes certain steps that are to be followed and documented when evaluating and selecting employees for new positions. Specifically, the plan requires that

- a job analysis be done before a position is advertised;
- the job analysis identify the major duties of the position, the basic and special knowledges, skills, and abilities to be used as criteria in evaluating applicants, and the minimum acceptable level of education and/or experience for the basic knowledges, skills, and abilities;
- a rating schedule be developed to measure the extent that each basically qualified applicant possesses the special knowledges, skills, and abilities for the position;
- the minimum area of consideration be chosen for advertising the position to allow NASS to locate enough highly qualified candidates to fill the position;
- all candidates be evaluated against the job-related criteria to determine if the candidates have the knowledges, skills, and abilities to satisfactorily do the job;
- candidates with the highest scores and whose qualifications clearly distinguish them from other candidates be referred to the NASS selecting official;
- the selecting official interview all the best qualified candidates if the official decides to interview any candidates; and
- certain documents be maintained in the merit promotion case file, such as a job analysis worksheet, evaluation of candidates form, position description, and notification of results.

UMP Candidates Were
Evaluated and
Selected According to
Almost All Merit
Promotion Procedures

On the basis of our review of all five merit promotion case files for the six UMP positions advertised during the period June 1988 through November 1990, we determined that EMS complied with almost all requirements in NASS' merit promotion plan (see table I.1). The exceptions were that EMS did not (1) choose the required minimum area of consideration when advertising two positions in the computer specialist series and (2) document that certain required steps were done for two other positions.

Appendix I
EMS and NASS Complied With Almost All
Merit Promotion Procedures When
Evaluating and Selecting Employees for
the UMP

Table I.1: Extent of Compliance With
Merit Promotion Procedures for All Six
UMP Positions Advertised in Five
Announcements During June 1988
Through November 1990

Merit promotion procedures	Number of cases in compliance
Job analysis done before position advertised	5
Major duties and evaluation criteria identified	5
Rating schedule developed of the special knowledges, skills, and abilities	5
Position advertised in minimum required area	4
Each candidate evaluated on job-related criteria	5
Best qualified candidates referred to selecting official	5
All best qualified candidates interviewed when it was decided that interviews were to be done	5
All required documentation maintained	3

For the two computer specialist positions, EMS advertised the positions with the minimum area of consideration shown as agencywide, local commuting area only. Under NASS' merit promotion plan, the minimum area of consideration must be NASS-wide when, as was the case with the computer specialist positions, the advertised position is in an occupational series that provides for advancing at two-grade intervals to reach the full performance level. According to the EMS case file, 16 employees applied for the computer specialist positions, and the personnel specialist determined that 8 of them were highly qualified. Even so, because EMS did not use the required minimum area of consideration, NASS employees outside the local commuting area (Washington, D.C.) did not have an opportunity to apply for the positions.

For two positions, merit promotion case files did not contain all of the required or equivalent forms for documenting the staffing actions. The required evaluation form did not indicate that a candidate, who was later selected, met all the basic criteria for one position. The EMS personnel management specialist said he had determined that the candidate met all three basic criteria but had failed to indicate this on the evaluation form for this position. Also, the file did not contain evidence that any of the six candidates for the position had been informed of the status of their applications. The case file for the other position did not contain the required notification of results form for the one employee who applied for the position. The EMS personnel management specialist said that the employee was informed orally of the receipt and status of her application.

Few Discrimination Complaints Filed

Figure II.1:

GAO Number of Discrimination Complaints About UMP

NASS Had Received Few Discrimination Complaints

- No Formal Complaints Filed on UMP in Approximately 11-Year Period
- Four Employees Had Concerns About Possible Discrimination in UMP Selections

Of 11 Formal Complaints Filed in Almost 11 Years, None Involved the UMP

According to an EMS official, NASS employees filed a total of 11 formal complaints of discrimination from January 1980 through November 1990, and none of the formal complaints involved the UMP. As table II.1 shows, 6 of the 11 formal complaints were filed by black employees. All six were filed before 1985 and involved such issues as promotion, reprisal, and sexual harassment. All but 1 of the 11 complaints had been closed by November 1990. The one open complaint was filed in February 1990.

Appendix II
Few Discrimination Complaints Filed

Table II.1: Formal Discrimination Complaints Filed by NASS Employees During Calendar Years 1980 Through 1990, by EEO Group^a

Year	Total filed	White men	White women	Black men	Black women
1980	2	1	1	-	-
1981	1	-	-	-	1
1982	2	-	-	1	1
1983	1	-	-	1	-
1984	2	-	-	-	2
1985	-	-	-	-	-
1986	1	1	-	-	-
1987	-	-	-	-	-
1988	1	1	-	-	-
1989	-	-	-	-	-
1990 ^b	1	1	-	-	-
Total	11	4	1	2	4

^aNo formal discrimination complaints were filed by EEO groups other than the four indicated during January 1980 through November 1990

^bThis represents January 1990 through November 1990

Four of 11 Informal Complaints Initiated During 1989 and 1990 Alleged Discrimination in Making Selections for the UMP

In fiscal year 1989, USDA implemented a new system for tracking informal complaints made by employees in each USDA agency. Data from this tracking system showed that five NASS employees initiated informal complaints in fiscal year 1989. Four of the five complaints involved the UMP. An EMS official who worked with an equal opportunity counselor in resolving these four complaints said four black women each sought EEO counseling in April 1989 alleging NASS discriminated against them on the basis of their race. However, none of the four employees pursued the allegations beyond the informal counseling stage. USDA's data showed that in fiscal year 1990, six informal complaints were initiated. According to EMS, none of the six involved the UMP.

According to a USDA official responsible for employees' appeals, USDA did not have complete and reliable data on informal complaints initiated before fiscal year 1989. In May 1990, an EMS official said that to his knowledge the four informal complaints discussed above were the only ones initiated over the last 10 years alleging discrimination in selecting employees for the UMP. This EMS official said that he had been with EMS for the previous 10 years and that he had been responsible for processing NASS complaints for 7 of those years.

Representation of EEO Groups in NASS

Figure III.1:

GAO EEOC Guidance on Actions to Address Underrepresentation

Guidance Does Not Define Levels of Underrepresentation

Numerical Goals Permitted But Not Required To Correct Underrepresentation

Agencies Must Establish Objectives To Overcome Barriers

EEOC's Guidance on Agency Actions to Address Underrepresentation

Under applicable EEOC guidance issued on October 6, 1987, agencies are required to (1) identify barriers and problems to achieving a representative work force, (2) identify barriers and problems within their control that can be eliminated within the 5-year cycle of the AEP plan, and (3) develop objectives and take actions that will eliminate the barriers. The guidance gives agencies the flexibility to decide what objectives and actions are needed to eliminate the barriers.

As part of their efforts to address underrepresentation, agencies may establish numerical goals for each job series or major occupational

grouping where an EEO group is substantially below its representation in the appropriate CLF (a "manifest imbalance" exists) or nearly or totally nonexistent in its work force (a "conspicuous absence" exists). The EEOC guidance does not define when an EEO group's representation in an agency's work force is substantially below its corresponding CLF representation.

In addition, the guidance says that where an agency's AEP plan reveals a continuing manifest imbalance in the EEO groups' representation, the EEOC may direct or require that additional steps be taken, such as the development of numerical goals, to remove barriers to equal employment opportunity. The EEOC guidance does not say what EEOC will do when its review of the agency's progress under its AEP plan shows a continuing conspicuous absence in EEO groups' representation.

NASS used the terms underrepresentation and severe underrepresentation, as defined in EEOC's former guidance, in its AEP plan for fiscal years 1988 through 1992. The former EEOC guidance, Management Directive 707 issued on January 9, 1981, defined the term underrepresentation as the disparity between the participation rate of an EEO group in the appropriate CLF and that group's participation in the agency's work force. Severe underrepresentation was said to exist when a particular EEO group's representation in an agency's work force was 50 percent or less than the group's representation in the CLF. When underrepresentation existed to any degree in agencies' work forces, EEOC required agencies to set numerical goals and timetables to address the underrepresentation.

Figure III.2:

GAO Extent of Underrepresentation in NASS' Overall Work Force

Five EEO Groups Fully
Represented

Five EEO Groups Not
Fully Represented

- Black Men
- Hispanic Men
- Hispanic Women
- Asian-American Men
- American Indian Men

Overall Representation of NASS' Work Force as of September 1989

Without regard to major occupational category, specific job series, and grade or pay level, five EEO groups were fully represented in NASS' work force. Five were not. Specifically, the overall representation of Hispanic men and women and American Indian men in NASS' work force ranged from about 21 percent to about 33 percent of their representation in the overall national CLF. Black men also were underrepresented (59 percent of the national CLF) but to a lesser degree than Hispanics and American Indian men. Asian-American men were 89 percent of the national CLF. (See table III.1.)

**Appendix III
Representation of EEO Groups in NASS**

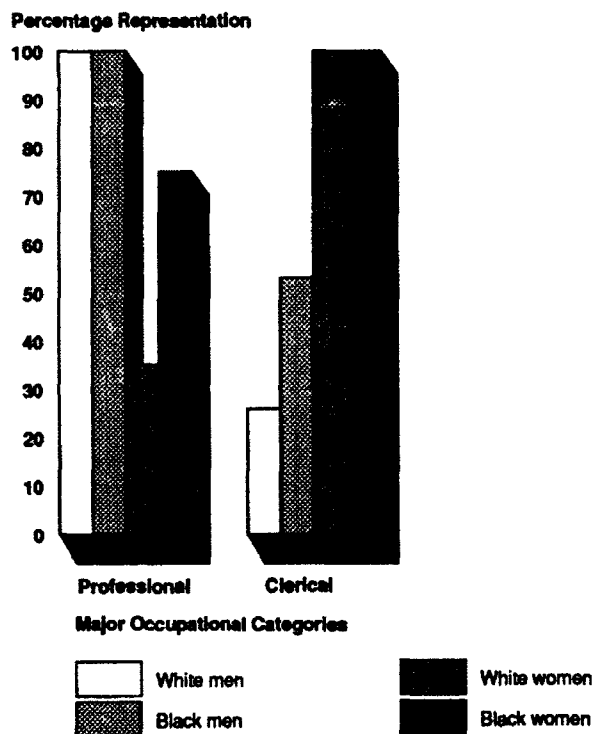
Table III.1: Five EEO Groups Were Fully Represented and Five Were Underrepresented as of September 1989

	EEO GROUP									
	White		Black		Hispanic		Asian-American		American Indian	
	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women
NASS' work force										
Number	476.0	363.0	29	89	8	7	6	8	1	6
Percentages	47.8	36.5	2.9	8.9	.8	.7	.8	.8	.1	.6
National CLF percentages	47.5	34.1	4.9	4.8	3.9	2.5	.9	.7	.3	.2
NASS' work force as a percentage of the CLF	100.0+	100.0+	59	100.0+	20.5	27.6	89	100.0+	33.3	100.0+
Additional employees needed to reach full representation	0	0	20	0	31	18	1	0	2	0

For these five EEO groups to be fully represented as of September 1989, we determined, by comparing the representation of all EEO groups in NASS' overall work force as of that date to the 1980 national CLF, NASS would have had to add 20 black men, 31 Hispanic men, 18 Hispanic women, 1 Asian-American man, and 2 American Indian men to its work force. Our calculations assume that the number of employees in the NASS work force and in each EEO group as of September 1989 would not have changed except for the minority employees indicated above.

Figure III.3:

GAO Imbalance in Professional and Clerical Jobs



Note 1: Percentage representation is the rate that an EEO group is represented in the occupational category in NASS' work force as compared to that group's representation in the national CLF occupational category.

Note 2: According to EEOC's former guidance, a percentage representation of 100 or higher means an EEO group was not underrepresented; 51 to 99 means some underrepresentation; and 50 or less means severe underrepresentation. NASS used these definitions.

Women Were Underrepresented in Professional Occupations and Fully Represented in Clerical Occupations as of September 1989

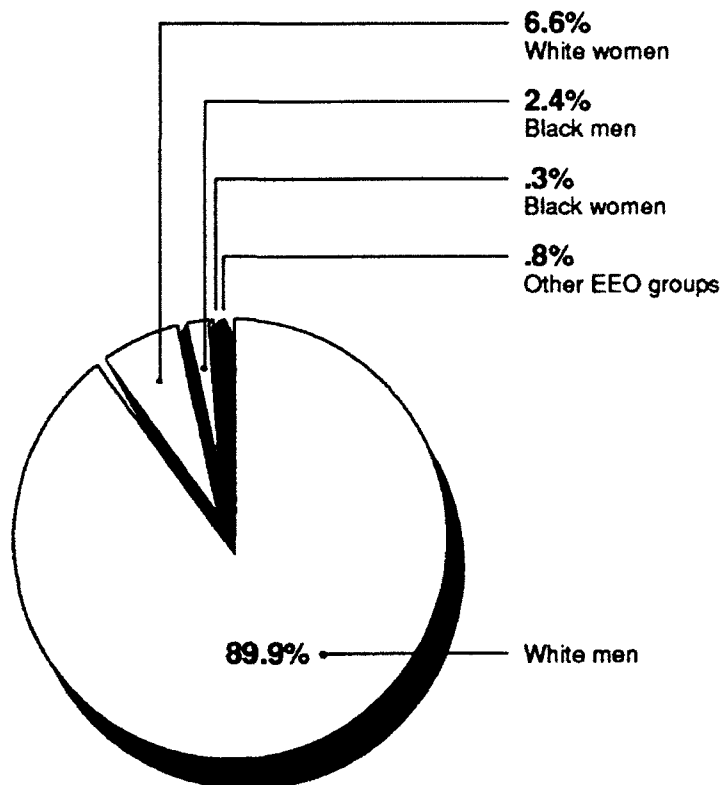
Seventy-six percent of NASS' 995 employees were in the professional (485 employees) and clerical occupations (269 employees). As figure III.3 shows, white men and black men were fully represented in the professional occupations, and white women and black women were underrepresented. For the clerical occupational category, the reverse was true. That is, white women and black women were fully represented, and white men and black men were underrepresented.

Compared to their representation in the national CLF, white women were underrepresented to a greater degree than black women in the professional occupations. White women represented 9.5 percent of the 485 professional employees, compared to 26.9 percent in professional occupations of the national CLF—a representation percentage of 35.3. Black women represented 2.1 percent of the employees in these occupations compared to 2.8 percent in professional occupations of the national CLF—a representation percentage of 75.0.

White Men Held Most Higher Graded Positions

Overall, NASS had a total of 288 employees at grades 13 and above, and 259 (90 percent) of these employees were white men, as shown in figure III.4.

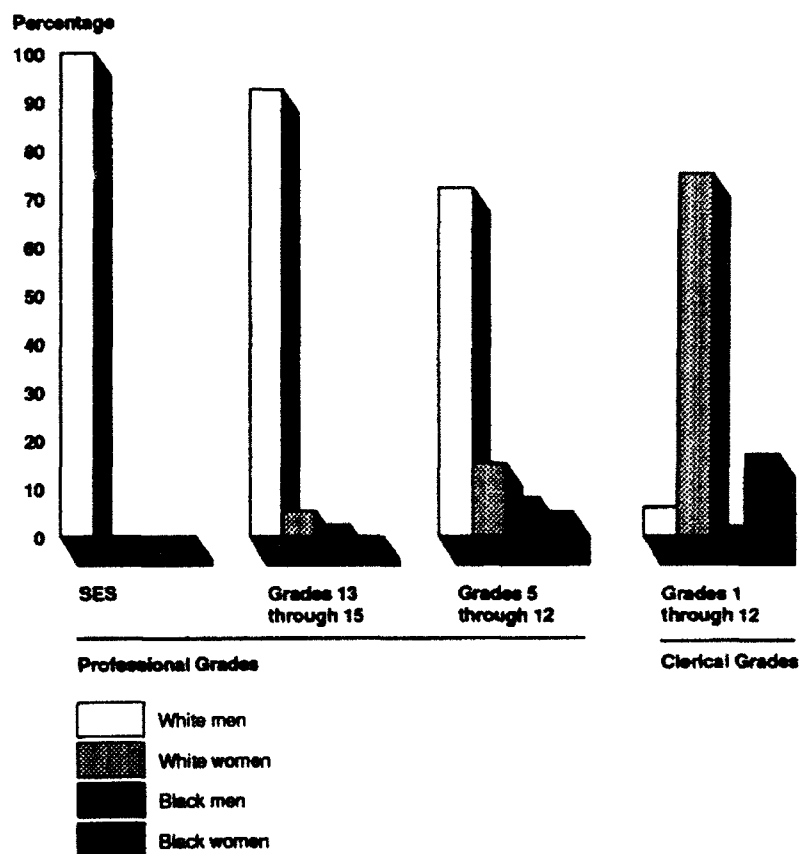
Figure III.4: White Men Held Most of
NASS' Positions at Grades 13 and Above



Note: The above figure represents 288 NASS employees at grades 13 and above as of September 1989

As shown earlier in figure III.3, white men and black men were fully represented in the professional category. This category accounted for most of NASS' higher graded employees (grades 13 and above). On the other hand, white women and black women were fully represented in the clerical category as shown earlier. This category accounted for most of NASS' lower graded employees (grades 12 and below). Although the CLF data do not break out EEO groups by pay or grade level, the imbalance between men and women in these two occupational categories can be seen in figure III.5 below.

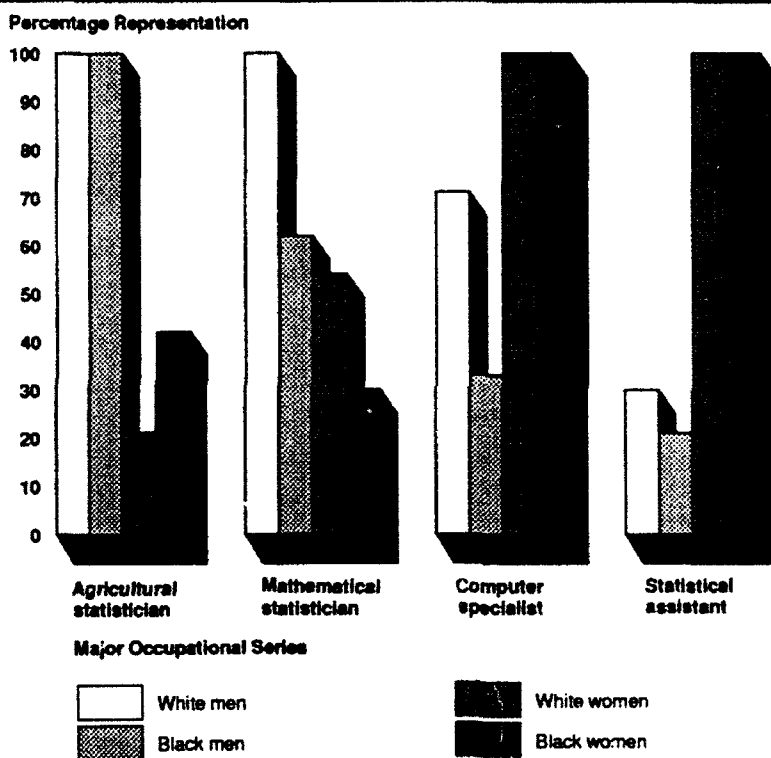
Figure III.5: An Imbalance Existed Among EEO Groups at Higher Graded Professional Positions and Lower Graded Clerical Positions



Note. Under the SES category, we included NASS employees in grades 16 through 18. According to an EMS official, four employees are in these grades under a pay plan other than the general schedule because they are on overseas assignments.

Figure III.6

GAO Representation of Women and Men in NASS' Largest Series



Note 1: Percentage representation is the rate that an EEO group is represented in the occupational category in NASS' work force as compared to that group's representation in the national CLF occupational category.

Note 2: According to EEOC's former guidance, a percentage representation of 100 or higher means an EEO group was not underrepresented; 51 to 99 means some underrepresentation, and 50 or less means severe underrepresentation. NASS used these definitions.

White Women and Black Women Were Severely Underrepresented in NASS' Largest Occupational Series—Agricultural Statistician

Almost three-fourths (738) of NASS' total employees (995) were in four occupational series. Specifically, NASS had 416 agricultural statisticians, 61 mathematical statisticians, 97 computer specialists, and 164 statistical assistants. The remaining 257 employees were in 24 occupational series (such as computer assistant, secretary, clerk typist, and data transcriber). White and black employees represented 709 of the 738 employees in the four occupational series.

In the agricultural statistician series, which accounted for 42 percent of all NASS employees, white men and black men were fully represented, and white women and black women were severely underrepresented (See figure III.6.) White women represented 8.4 percent of the 416 agricultural statisticians in NASS, compared to 39.5 percent in statistician occupations in the national CLF—a representation percentage of 21.3. Black women represented 2.2 percent of the employees in this occupational series, compared to 5.3 percent in statistician occupations in the national CLF—a representation percentage of 41.5.

In the mathematical statistician series, white men were fully represented, and white women, black men, and black women were all underrepresented. White women comprised 21.3 percent of the total employees in this job series, compared to 39.5 percent in the statistician occupations in the CLF—a representation percentage of 53.9. Black men and black women each comprised 1.6 percent of the total mathematical statisticians, compared to 2.6 percent and 5.3 percent in the statistician occupations in the national CLF—a representation percentage of 61.5 and 30.2, respectively.

In the remaining two occupational series, white women and black women were fully represented, and white men and black men were underrepresented. White men comprised 49.5 percent of all the computer specialists in NASS and comprised 69.8 percent of the computer specialists in the national CLF—a representation percentage of 70.9. Black men comprised 1.0 percent of all the computer specialists in NASS and comprised 3.0 percent of the national CLF computer specialist job series—a representation percentage of 33.3. White men employed as statistical assistants in NASS comprised 6.1 percent of all statistical assistants in NASS and comprised 20.5 percent of the national CLF statistical assistant job series—a representation percentage of 29.8. Black men comprised 0.6 percent of the statistical assistants in NASS compared to 2.8 percent of the national CLF statistical assistant job series—a representation percentage of 21.4.

NASS' Efforts to Address Underrepresentation

Figure IV.1

GAO NASS' Plans and Actions to Correct Underrepresentation

Strategies Focus on Specific Job Series

- Internal Barriers Targeted
- Hiring Goals Set
- Promotions and UMP Used

NASS' Strategies Focus on Underrepresentation in Specific Job Series

As shown in previous tables and figures, EEO groups were underrepresented to varying degrees within NASS' overall work force, major occupational categories, grade categories, and major occupational series as of September 1989. According to NASS' 5-year (fiscal years 1988 through 1992) AEP plan, related updates, and accomplishment reports, NASS strategies for addressing underrepresentation included (1) taking steps to alleviate the negative impact of certain barriers to recruiting, hiring, and retaining employees in EEO groups underrepresented in the agricultural and mathematical statistician job series; and (2) establishing numerical hiring goals for its four largest occupational series—

agricultural statistician, mathematical statistician, computer specialist, and statistical assistant. According to NASS' AEP plan, the hiring goals were established on the basis of the (1) level of underrepresentation and (2) possibilities for hiring to address the underrepresentation in the agency's four largest occupational series.

NASS said its strategies for addressing underrepresentation also included (1) promoting minorities and women in the four series; (2) reassigning employees from other job series to the four job series in which EEO groups were underrepresented to meet its hiring goals and for the employees' career development; and (3) using its UMP to select minority employees as UMP participants and give them the opportunity for advancement to higher level positions.

Actions Taken to Overcome Barriers in the Agricultural and Mathematical Statistician Job Series

NASS identified in its AEP plan two barriers to recruiting, hiring, and retaining employees in EEO groups underrepresented in its work force. One barrier was that the agency's recruitment sources and methods did not yield sufficient numbers of qualified women and minorities to address underrepresentation of these groups in the agricultural and mathematical statistician job series. For example, NASS reported that it had not been able to locate enough qualified women and minority candidates who met the educational requirement for agricultural statistician at the locations it used for recruiting. This requirement was a minimum of 15 semester hours in mathematics or statistics and a minimum of 9 semester hours in other physical or social sciences.

To overcome the recruiting barrier, NASS established hiring goals in its 5-year AEP plan and in plan updates to meet a specific objective of recruiting and hiring qualified minorities and women. NASS reported in its AEP plan accomplishment reports that actions taken during fiscal years 1988 and 1989 to meet its hiring goals included (1) targeting recruitment activities toward minority sources and organizations; (2) cooperating with advisors at colleges and universities that have large female and minority enrollments to encourage more students to enroll in mathematics and statistics courses to meet the basic educational requirements for NASS' positions; (3) contributing funds for the purchase of a minority job applicant database for its largest job series; and (4) attending recruitment conferences sponsored by minority and women organizations, such as the National League of United Latin American Citizens and Federally Employed Women Inc., to find qualified applicants.

In addition to the above actions to achieve its hiring goals, NASS reported in its AEP plan accomplishment reports that during fiscal years 1988 and 1989 it (1) maintained a list of qualified applicants for federal employment and examining authority for the agricultural statistician and mathematical statistician job series and (2) obtained direct-hire authority for the above statistician positions in the Washington, D.C., metropolitan area.

NASS also identified a barrier to retaining women underrepresented in the agricultural statistician series. This barrier was NASS' requirement that employees in this job series periodically relocate to different geographical areas to gain the necessary job-related expertise for career advancement. According to NASS' AEP plan, this mobility requirement had more of a negative impact on retaining women than men in this job series. To minimize this impact, NASS reported in its AEP plan that the agency (1) reduced the number of geographical relocations required; (2) fulfilled requests to relocate employees to satisfy the employees' personal needs without compromising the agency's staffing needs; and (3) provided employment-related assistance, to the extent possible within time, budget, and resource constraints, to working spouses of NASS employees who relocate.

NASS' Progress in Achieving Fiscal Year 1989 Numerical Hiring Goals in Its Four Largest Occupations

In each of the four occupational series, 6 or more of the 10 EEO groups were not fully represented in NASS' work force as of October 1, 1988. NASS met or exceeded hiring goals for some EEO groups in the four occupational series during fiscal year 1989 through actual hires and reassignment of employees from other job series. For example, NASS exceeded the goal for white women in all four occupational series. NASS did not set a goal for several underrepresented EEO groups, and when it set goals, it did not always achieve them. As of September 30, 1989, 4 or more of the 10 EEO groups were not fully represented in NASS' work force. (See table IV.1.)

Appendix IV
NASS' Efforts to
Address Underrepresentation

Table IV.1: NASS' Progress in Achieving Fiscal Year 1989 Numerical Hiring Goals in Its Four Largest Occupational Series, by EEO Group

Occupational series	EEO GROUP									
	White		Black		Hispanic		Asian-American		American Indian	
	Men	Women	Men	Women	Men	Women	Men	Women	Men	Women
Agricultural statistician										
1988 Percentage representation ^a	100+	19	100+	38	77	0	31	0	100+	0
Hiring goals	0	3	1	1	1	0	0	0	0	0
Actual hires	26	9	1	2	1	1	0	0	0	0
Reassignments ^b	3	1	0	0	0	0	0	0	0	0
Subtotal	29	10	1	2	1	1	0	0	0	0
1989 Percentage representation ^a	100+	21	100+	42	74	16	30	0	100+	0
Mathematical statistician										
1988 Percentage representation ^a	100+	43	65	32	0	0	0	0	0	0
Hiring goals	0	1	1	0	1	1	1	0	0	0
Actual hires	2	3	0	0	0	0	0	0	0	0
Reassignments ^b	4	1	0	0	0	0	0	0	0	0
Subtotal	6	4	0	0	0	0	0	0	0	0
1989 Percentage representation ^a	100+	54	62	30	0	0	0	0	0	0
Computer specialist										
1988 Percentage representation ^a	74	100+	37	100+	0	100+	82	100+	0	100+
Hiring goals	0	2	1	0	0	1	0	0	0	0
Actual hires	4	3	0	0	0	0	1	0	0	0
Reassignments ^b	0	1	0	0	0	0	0	0	0	0
Subtotal	4	4	0	0	0	0	0	0	0	0
1989 Percentage representation ^a	71	100+	33	100+	0	100+	100+	100+	0	100+
Statistical assistant										
1988 Percentage representation ^a	27	100+	21	100+	0	18	100+	100+	0	0
Hiring goals	1	8	1	3	0	1	0	1	0	0
Actual hires	0	16	0	0	1	0	0	0	0	0
Reassignments ^b	0	6	0	1	0	0	0	0	0	0
Subtotal	0	22	0	1	1	0	0	0	0	0
1989 Percentage representation ^a	30	100+	21	100+	55	18	100+	100+	0	0
Total										
Hiring goals	1	14	4	4	2	3	1	1	0	0
Actual hires/ Reassignments	39	40	1	3	2	1	1	0	0	0

^aPercentage representation is the rate that the applicable EEO group is represented in the occupational category in NASS' work force as compared to that group's representation in the national CLF occupational category. The 1988 and 1989 percentages are based on NASS' work force data as of October 1, 1988 and September 30, 1989, respectively.

^bThe figures shown on this row represent staff reassigned from other job series. NASS did not set reassignment goals but used reassignments in meeting its hiring goals.

Specifically, the extent to which NASS set and accomplished hiring goals for each of the four occupational series was as follows.

- Seven EEO groups were underrepresented in the agricultural statistician series as of October 1988. The same seven groups were underrepresented as of September 1989. NASS met or exceeded the fiscal year 1989 hiring goals set for three of the seven underrepresented groups (white women, black women, and Hispanic men). Although NASS had not set a goal for Hispanic women, who also were underrepresented in this job series, NASS hired one. NASS also met the goal of hiring one black man. This EEO group was fully represented in this job series.
- In the mathematical statistician series, 9 of the 10 EEO groups were underrepresented as of October 1988. The same nine groups were underrepresented as of September 1989. NASS set goals for five of the nine underrepresented EEO groups. NASS exceeded the goal for white women but did not meet the goals for the other four underrepresented EEO groups.
- Five EEO groups were underrepresented in the computer specialist series as of October 1988, and four of the five groups were underrepresented as of September 1989. NASS set a goal for one of them (black men) and did not meet the goal. NASS exceeded the goal for white women, who were fully represented in this job series. Although NASS did not set a goal for white men and Asian-American men, four white men and one Asian-American man were hired during the fiscal year.
- Six EEO groups were underrepresented in the statistical assistant series as of October 1988. The same six groups were underrepresented as of September 1989. NASS set, but did not meet, a goal for three of the six groups. NASS hired an employee in one underrepresented group (Hispanic men) where no goal was set. NASS exceeded a goal for white women. This EEO group was fully represented in the statistical assistant series.

According to NASS' administrator, numerical goals were set for underrepresented groups when qualified applicants were available in the labor force to meet goals. However, in August 1990, NASS and EMS did not have data on its efforts to locate and hire qualified minorities. NASS and EMS officials said that before fiscal year 1990, they had not systematically collected data on its recruiting efforts, which were done primarily by NASS' 45 field offices. As a result, NASS headquarters did not have data, by EEO group, on things such as the number of applications received and on offers made, accepted, and declined. An EMS official said that in fiscal year 1990, NASS began to collect and document data on its recruiting efforts. For example, the EMS official said in October 1990 that each of the 45 NASS field offices was asked to provide data on their

fiscal year 1990 recruiting efforts, such as number of colleges and universities visited, the results of their 1990 recruiting efforts, and where they planned to recruit in fiscal year 1991.

NASS' Experience in Promoting Employees and Making UMP Selections in the Four Largest Occupational Series in Fiscal Year 1989

NASS provided data that showed a total of 117 employees were promoted in its 4 largest occupational series during fiscal year 1989. NASS also selected a total of five employees under its UMP during fiscal year 1989; four of the five were selected for two of the four job series. Employees in all of these occupational series, except statistical assistant, can be competitively promoted up to the SES pay level. The grade range for the statistical assistant series was up to grade 8.

Promotions

Sixty-seven (57 percent) of the 117 employees promoted were white men, 29 (25 percent) were white women, 4 (3 percent) were black men, 9 (8 percent) were black women, and 8 (7 percent) were from other EEO groups. In total, NASS promoted 50 employees in EEO groups other than white men during fiscal year 1989. Even so, white men, who comprised 48 percent of NASS' work force, still held 90 percent of all NASS positions at grades 13 and above as of September 23, 1989. In NASS' largest occupational series, agricultural statistician, white men held 201 (95 percent) of the 212 positions at grades 13 and above as of that date. As of September 1989, NASS also had five white women, five black men, and one American Indian man at grades 13 and above in the agricultural statistician series. Thirteen white men, 2 of the white women, and 2 of the black men were promoted to grades 13 or above during fiscal year 1989. NASS had no other minority employees at grades 13 and above in this occupational series during fiscal year 1989.

Table IV.2 shows the number and percent of employees in each EEO group promoted in the four occupational series during fiscal year 1989.

**Appendix IV
NASS' Efforts to
Address Underrepresentation**

**Table IV.2: NASS Employees Promoted
During Fiscal Year 1989 in the Four
Largest Occupational Series, by EEO
Group**

Occupational series and EEO group	Number promoted	Total number of employees^a	Percent promoted
Agricultural statistician			
White men	46	334	14
White women	9	32	28
Black men	4	23	17
Black women	1	8	13
Hispanic men	1	4	25
Hispanic women	0	0	0
Asian-American men	0	3	0
Asian-American women	0	0	0
American Indian men	0	1	0
American Indian women	0	0	0
Subtotal	61	405	
Mathematical statistician			
White men	8	47	17
White women	3	10	30
Black men	0	1	0
Black women	0	1	0
Hispanic men	0	0	0
Hispanic women	0	0	0
Asian-American men	0	0	0
Asian-American women	0	0	0
American Indian men	0	0	0
American Indian women	0	0	0
Subtotal	11	59	
Computer specialist			
White men	11	46	24
White women	5	26	19
Black men	0	1	0
Black women	1	8	13
Hispanic men	0	0	0
Hispanic women	1	1	100
Asian-American men	1	2	50
Asian-American women	2	4	50
American Indian men	0	0	0
American Indian women	1	1	100
Subtotal	22	89	
Statistical assistant			
White men	2	9	22
White women	12	122	10

(continued)

Appendix IV
NASS' Efforts to
Address Underrepresentation

Occupational series and EEO group	Number promoted	Total number of employees^a	Percent promoted
Black men	0	1	0
Black women	7	25	28
Hispanic men	0	0	0
Hispanic women	1	1	100
Asian-American men	0	1	0
Asian-American women	1	5	20
American Indian men	0	0	0
American Indian women	0	0	0
Subtotal	23	164	
Grand total	117	717	

^aThe figures in this column represent the total number of employees, by EEO group, in the four occupations as of October 1, 1988.

UMP Selections

Five employees—two white women, two black women, and one Hispanic woman—were selected for NASS' UMP during fiscal year 1989. One of the white women was selected for the agricultural statistician series. The other white woman was selected for a computer assistant position, which is a bridge position that leads to the computer specialist series. Both black women, who were selected for the computer specialist series, informally alleged in April 1989 that NASS had discriminated against them because of their race. The one Hispanic woman also was selected for the computer specialist series.

NASS and EMS officials said that several factors have limited the role of the UMP in addressing underrepresentation. NASS' administrator said that each year from 1982 through 1990, NASS' personnel ceilings have been reduced. Another NASS official said the personnel budget cuts put pressure on the agency to be more productive with fewer people, and as a result, NASS emphasized recruitment of people already trained and experienced to meet EEO goals rather than the UMP. An EMS official also said that NASS had been discouraged with the use of the UMP after losing employees shortly after their UMP training.

Major Contributors to This Report

General Government
Division, Washington,
D.C.

James T. Campbell, Assistant Director
Mary Y. Martin, Evaluator-in-Charge
Michael J. O'Donnell, Senior Evaluator (Advisor)