

Minority Recruitment *at* **GAO**





Personnel
Appeals
Board

September 27, 2002

The Honorable David M. Walker
Comptroller General
United States General Accounting Office
Room 7000
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Walker:

Pursuant to the authority granted to it under the General Accounting Office Personnel Act of 1980, the Personnel Appeals Board has statutory responsibility to oversee equal employment opportunity at GAO. In exercise of that authority, the Board is issuing the attached report on the minority recruitment program at GAO.

The Board's study examined how the Agency fulfills its statutory mandate with regard to the implementation of a minority recruitment program. The Board's conclusions and recommendations about the program are contained in the attached report.

Sincerely yours,

Handwritten signature of Jeffrey S. Gulin in cursive.

Jeffrey S. Gulin
Chair

Attachment

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Personnel Appeals Board and Staff

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Background

In this study, the Personnel Appeals Board (PAB or the Board) of the U.S. General Accounting Office (GAO or the Agency) is examining recruitment procedures at GAO to determine whether GAO has implemented a minority recruitment program in accordance with the mandate of 31 U.S.C. §732(f)(1)(B).¹

The General Accounting Office Personnel Act (GAOPA)² directs that the personnel management system of GAO shall include a minority recruitment program consistent with 5 U.S.C. §7201. Specifically, section 7201 mandates that each Executive branch agency conduct a continuing program for the recruitment of members of minority groups as part of an overall anti-discrimination policy ensuring equal employment opportunities without discrimination on account of race, color, religion, sex, or national origin. The establishment of a minority recruitment program is premised on a finding of underrepresentation and is to be specifically designed to eliminate underrepresentation in various job categories. To achieve this objective, section 7201 calls for special recruitment efforts within minority communities and educational institutions, as well as other sources from which minorities can be recruited.

Section 7201(c) also provides for Office of Personnel Management (OPM) oversight of executive branch agency minority recruitment efforts. OPM's implementing regulations for section 7201 set forth a number of means by which OPM can assist executive branch agencies with their minority recruitment programs.³ Pursuant to the regulations, OPM assists agencies in identifying which, and to what extent, minority groups are underrepresented⁴ within an agency's ranks.⁵ If underrepresentation is a factor, OPM may help to re-direct internal and external recruitment efforts. For example, OPM may suggest an agency supplement its efforts by utilizing existing networks for disseminating job information and involving minority groups and women's organizations where practicable. Efforts may be directed at expansion of the applicant pools, as well.

In addition to the requirement of a "continuing program" for recruitment of minorities and women to correct underrepresentation in various job categories, OPM expects that each executive branch agency will:

¹ Section 732(f)(1)(A) of the GAOPA states: The personnel management system shall

(A) provide that all personnel actions affecting an officer, employee, or applicant for employment be taken without regard to race, color, religion, age, sex, national origin, political affiliation, marital status, or handicapping condition.

² 31 U.S.C. §§731-755.

³ 5 C.F.R. §§720.202-207. The regulations define "minority" as those groups classified as "minority" for the purpose of data collection by the OPM and the EEOC in furtherance of Federal equal employment opportunity policies. *Id.*, §720.202(c).

⁴ Underrepresentation is defined as "a situation in which the number of women or members of a minority group within a category of civil service employment constitutes a lower percentage of the total number of employees within the employment category than the percentage women or the minority constitutes within the civilian labor force of the United States . . ." 5 C.F.R. §720.202(a).

⁵ Currently, Hispanics remain the only underrepresented minority group in the Federal Government, comprising 6.7 percent of the Federal workforce and 11.9 of the Civilian Labor Force (CLF). Women make up 44 percent of the Federal workforce and 46.5 percent of the CLF. *Federal Equal Opportunity Recruitment Program*, FY 2001 Annual Report to Congress, p. 2 (March 2, 2002) (Hereafter *FEORP*).

- (1) specifically designate responsibility for program implementation to an appropriate official;
- (2) cover recruitment for part-time and temporary positions;
- (3) have an up-to-date plan that covers various organizational levels and geographic locations;
- (4) include annual and specific determinations of underrepresentation for each group.⁶

To remedy findings of underrepresentation, Executive agency minority recruitment programs must also identify jobs which can be redesigned for minorities and women; describe specific, special efforts to recruit in communities, at certain educational institutions, and other likely sources of qualified minority and female candidates; and identify training and job development programs the agency will use to provide skills, knowledge and abilities to qualify increased numbers of minorities and women for occupational series and grade levels where they are significantly underrepresented.⁷

JURISDICTION

The GAOPA directs the PAB to oversee equal employment at GAO through review and evaluation of its procedures and practices.⁸ Pursuant to this directive, the Board's Office of EEO Oversight conducts studies of selected issues involving equal employment practices and procedures at GAO and prepares evaluative reports that may contain specific recommendations for changes the Board deems necessary.

Topics are selected by the Board from proposals put forth by staff during an annual program planning cycle. Prior to the preparation of proposals, the Director of the Office of Oversight conducts independent research and often consults with GAO Employee Advisory Council members to solicit suggestions for topics of interest to employees. In addition, the Board's General Counsel may suggest topics for oversight studies, based on her contacts with GAO employees and independent assessment of GAO policies and practices.

METHODOLOGY

The Board selected the time period of January 1, 1997, through December 31, 2000 for its study of GAO's recruitment efforts since that time period coincided with the revival of recruitment at GAO after a five year downsizing effort. In March 2001, staff submitted written questions and data requests to the Human Capital Office about recent recruitment initiatives, including information about where the Agency recruits, who does its recruiting, how decisions about recruiting efforts are made, and how the Agency fulfills its statutory mandate with regard to a minority recruitment program. The Board also asked the Agency for policies, GAO Orders, directives and internal memoranda that govern recruitment at GAO. In addition, the Board requested that the Agency provide data for its recent hires, student interns and recruiters, broken down by race, gender, national origin, age and disability. In April 2001, the Agency transmitted an initial batch of information and data to the Board and supplemented that information in late May 2001. In July of that year, PAB staff became aware of a number of discrepancies in the data that had been supplied and notified the Agency of the problems in August, describing them in detail. The correct figures were provided to the Board in November 2001.

⁶ 5 C.F.R. §720-204(a); §720-205(a),(b).

⁷ 5 C.F.R. §720.205(e)(4-6).

⁸ 31 U.S.C. §732(f)(2)(A); *see* applicable regulations at 4 C.F.R. §§28.91 and 28.92.

Recruitment at GAO

RECRUITMENT IN THE 1990'S

In 1992, the Agency began reducing in size from nearly 5,300 employees to the current level of approximately 3,200 employees. The reduction in the workforce was accomplished through a hiring freeze, separation incentives programs, a Reduction-in-Force (RIF) that included field office closings, relocation of some functions and personnel to the Executive Branch, and normal attrition. GAO's downsizing effectively precluded any recruitment efforts between 1992 and 1997.⁹

In FY 1998, recruiting and hiring at GAO resumed with the revitalization of the Office of Recruitment (OR) and publication of 82 vacancy announcements, resulting in about 8,000 applications. The Agency hired 227 new permanent employees, a significant increase from the 42 new permanent employees who joined the Agency in FY 97.¹⁰ In FY 1999 and FY 2000, an additional 253 new permanent employees began careers at GAO, with nearly that many joining the Agency in FY 2001.¹¹

THE OFFICE OF RECRUITMENT¹²

GAO has an Office of Recruitment that is responsible for coordinating, managing and monitoring hiring at the Agency. Office of Recruitment staff propose and design recruitment initiatives and refine policy in the employment area for the Agency. In addition to providing technical advice and training to recruiters, the Office also "markets" GAO to potential applicant sources that include state and local governments, professional organizations and associations, and colleges and universities. Recently, the Office produced a videotape that describes GAO, its functions and missions, provides a visual tour of the facilities, and shows vignettes of day-to-day life at the Agency. The Office serves as the focal point for applicants, as well as organizations and institutions involved in the hiring/placement process.

The Office has compiled a comprehensive list of its vacancy announcements for distribution that includes a large number of organizations and associations, the members of which are predominantly female, Indian, Asian, African-American, and Hispanic. Vacancy announcements are also posted to USA JOBS, OPM's electronic posting of available jobs in the Federal Government. In addition, the Office stresses a commitment to diversity through action, ensuring that recruitment occurs at campuses with diverse populations, that recruiters come from diverse backgrounds, and that recruiters emphasize the Agency's diversity at campus information sessions.¹³

The resumption of recruiting at GAO has resulted in evolving recruitment plans and procedures from year-to-year. Generally, recruitment efforts begin with managing directors and unit heads conducting needs assessments to ascertain the number of vacancies that exist and to detect any skills imbalances present in their offices. That process allows Agency management to set an Agency-wide hiring goal for entry-level staff. The annual evaluator/analyst recruiting season then begins with the publication and dissemination of a general vacancy announcement that publicizes agency-wide openings at the Band I-D level to be filled on an on-going basis.

⁹ Letter from Jesse E. Hoskins, Human Capital Officer, GAO (April 23, 2001).

¹⁰ Letter from Jesse E. Hoskins, Human Capital Officer, GAO (November 14, 2001).

¹¹ *Ibid.*

¹² The Office is now called the Recruitment and Employment Office.

¹³ Meeting Summary, New Hire Advisory Council, December 18, 2000.

THE STUDENT INTERN PROGRAM

In the fall or winter of each year, GAO publishes a vacancy announcement for student interns which it disseminates widely and posts on its own external web site and OPM's USA JOBS. GAO hires students enrolled as undergraduates and graduates in its intern program which is governed by GAO Order 2308.1, "Student Employment Program." The internship program at GAO is an integral part of its recruitment program, as interns who successfully complete a ten week (400 hours) program and their degree requirements may be appointed to positions at GAO without competing for those jobs. GAO offered positions to 57 percent of the interns who worked for the Agency between January 1, 1997 and December 31, 2000; 54 percent of them accepted the offers.¹⁴

COLLEGE RECRUITING

Recruitment for student interns and many of the entry-level positions occurs primarily on college campuses and is accomplished through GAO staff attendance at career fairs, through interviews and presentations, and through meetings with faculty. For example, during the 1999-2000 academic year, GAO staff participated in more than 100 career fairs. Although GAO staff is involved in recruiting activities at many schools each year, the Agency has targeted certain universities at which to concentrate its activities, chosen because they are schools with strong public policy or public administration departments from which GAO has hired the most candidates in the past 10 years.¹⁵ A GAO employee from the Senior Executive Service (SES) is assigned to each of the targeted schools to serve as a "campus coordinator" to establish and maintain contact with the placement offices, participate in career fairs, and conduct on-campus interviews.¹⁶ In addition, recently hired alumni are also involved in on-campus recruiting efforts where they seek to establish rapport with promising applicants. The fields of accounting, business administration, public policy, computer science, economics and the social sciences produce most of the successful candidates for employment as analysts at GAO, a category that comprises more than 70 percent of the Agency's workforce.¹⁷

NEW HIRES ADVISORY GROUP

In December, 2000, the Agency established a New Hires Advisory Group, the purpose of which is to "provide periodic, informal advice to the center for recruiting and Human Capital Operations about effective strategies for recruiting and hiring entry level staff into GAO."¹⁸ The group usually meets at least twice a year and has been asked to provide comments on recruiting materials and to give tips on communicating with potential applicants and interviewees. The 16-member group, selected by the Managing Director for Goal 3 Operations, consists of one person from each team and region whose most recent degree was conferred in 1998 or later; most of the members attended a GAO "targeted" university.

¹⁴ Between January 1, 1997 and December 31, 2000, the Agency employed 305 student interns. GAO hired 131 student interns for the summer of 2001.

¹⁵ Sixty-seven percent of all GAO's hires in the 1990's came from the following schools: Columbia University, Duke University, George Mason University, George Washington University, Georgetown University, Harvard University, Indiana University-Bloomington, Ohio State University, Pennsylvania State University, Princeton University, Stanford University, Syracuse University, University of California-Berkeley, University of Chicago, University of Maryland-College Park, University of Michigan-Ann Arbor, University of Minnesota-Twin Cities, University of North Carolina-Chapel Hill, University of Pittsburgh, University of Texas-Austin, University of Washington, and Virginia Polytechnic and State University.

¹⁶ Of the current campus recruitment coordinators, 14 are white, 5 are black, 2 are Hispanic and one is Asian. In addition, 9 are female and all are 40 or over.

¹⁷ Seventy-two percent of the 2000-01 entry-level analyst class majored in public administration or a similar course of study. In addition, 88 percent of the class had master's degrees and 9 percent had doctoral degrees.

¹⁸ Chartering Memorandum, *New Hires (Entry Level) Advisory Group Purpose and Organization*, November 15, 2000.

Of the 16, 12 members are female, one is black, three are Asian, two are Hispanic and 10 are white. All of the members are under 40 and none has a disability.

ADDITIONAL INITIATIVES

The Agency has made additional efforts to attract minority candidates. In April 2000, the Comptroller General traveled to Florida A&M University, a school designated as an Historically Black College or University (HBCU), to conduct a full day of recruiting activities at the School of Business. Howard University and Jackson State University, both HBCU's, have also been added to the list of target schools. Recently, the Agency created a list of 18 "Minority Outreach, Developmental, and Special Focus Universities" in which to expand current recruiting efforts, in addition to 27 universities where GAO already has well-established recruiting relationships. Among others, the list includes three HCBU's,¹⁹ five schools serving a large Hispanic population;²⁰ two schools with high percentages of Asian American students;²¹ and a university with a large number of Native American students.²²

¹⁹ Clark Atlanta University, Tennessee State University and Texas Southern University.

²⁰ University of Puerto Rico, University of Texas-San Antonio, California State University-Los Angeles, New Mexico State University, and University of Texas-El Paso.

²¹ San Diego State University and the University of Illinois-Chicago.

²² University of Oklahoma.

Data

WORKFORCE PROFILES

The Office of Personnel Management suggests that agencies develop a workforce profile that shows "... a complete picture of their workforce and how it reflects diversity at all levels, in all key occupations, and in all organizational components."²³ This picture, according to OPM, will assist an agency in targeting its recruiting efforts to attract top-notch minority candidates who fit the agency's strategic goals and mission.

GAO monitors its eeo profile on a continuing basis. Snapshots of its workforce show that, at the beginning of the Board's study, the Agency employed 3,458 people; near the end of the study, there were 3,124 on board. As the percentages on the following chart indicate, the eeo profile of GAO has remained fairly constant.

46% female (1997)
47.5% female (2000)

	WM	WF	BM	BF	HM	HF	AM	AF	OM	OF
1997	44.9%	27.2%	5.5%	14.8%	2.2%	1.5%	1.5%	2.05%	.09%	.15%
2000	42.7%	28.9%	5.7%	14.3%	2.3%	1.6%	1.7%	2.6%	.06%	.10%

In 1998, GAO undertook a comprehensive analysis of its workforce, comparing its staffing to relevant civilian labor force (RCLF) data by job series.²⁴ A comparison of GAO's evaluator and evaluator-related staff, which comprised more than 70 percent of the workforce, with its relevant counterpart occupation in the civilian labor force found:

38.3% female (GAO)
37.2% female (RCLF)

	White	Black	Asian	Hispanic	American Indian
GAO	78.6%	13%	4%	4.2%	.2%
RCLF	88.3%	5.2%	3.1%	3.0%	.4%

²³ *Building and Maintaining a Diverse and High Quality Workforce*, p.13, U.S. Office of Personnel Management (June 2000).

²⁴ The Civilian Labor Force is defined as all non-institutionalized persons 16 years old or over who are employed or unemployed and seeking work. CLF data come from the Bureau of the Census' 1990 decennial census and the Bureau of Labor Statistics Current Population Survey (CPS). To determine the Relevant Civilian Labor Force (RCLF), the nationwide civilian occupations that are directly comparable to GAO's job series are extracted from the general CLF data.

The Agency conducted similar comparisons with its attorney and other professional populations, clerical and support staff, Senior Executive Service (SES), investigators and wage grade employees.²⁵ Within the various populations, GAO's percentages were statistically significantly²⁶ larger than the RCLF percentages in five categories of African-American employees; one category of Hispanic employees; one category of Asian employees; and four categories of female employees.²⁷ The Agency calculated statistically significant lower percentages of employees in protected groups at GAO than were present in the RCLF (*i.e.* under) for Hispanic professionals (non-attorney or evaluator) and in four categories of white employees.

In July 2000, the Agency looked again at corresponding civilian labor force data with respect to protected groups at GAO. At that point, overall, GAO exceeded the percentage of the CLF in every protected group.²⁸

41.32% female (RCLF)
47.62% female (GAO)

	White	Black	Asian	Hispanic	Other
RCLF	85.53%	7.6%	3.12%	3.37%	.38%
GAO	71.39%	20.28%	4.42%	3.75%	.16%

Currently, it is GAO's practice to conduct periodic reviews of eeo data in the areas of hiring, promotions, staff training and development, and the processing of complaints. If, during the course of the review, any trends are identified that could lead to a finding of underrepresentation with respect to a protected group, then GAO would take remedial action.²⁹

NEW HIRES

During the course of the Board's study, the Agency hired 542 permanent new employees and 305 student interns. Additionally, the Agency hired 127 employees on time-limited appointments. The profile of those employees follows:

²⁵ Clerical and wage grade employees were compared with DC Metropolitan Area CLF figures; SES employees were compared with OPM government-wide data.

²⁶ A finding is statistically significant when it can be demonstrated that the probability of obtaining that finding by chance is relatively low. The generally accepted "probability threshold" is five percent, *i.e.*, the result would occur no more than 5 out of 100 times in a random sample with chance variations operating. Statistical significance in the 1998 comparison was performed at the .05 level of significance.

²⁷ For African-Americans, they were Evaluator and Evaluator-related employees; attorneys; GS professional and clerical staff; and Wage Grade employees; for Hispanics and Asians, the category was Evaluator and Evaluator-related; and for females, the categories were attorneys, GS professional and clerical employees and SES.

²⁸ To compare, in a summary of Executive Branch recruiting efforts in FY 2000, OPM reported that women met or exceeded their RCLF representation in 8 of 22 independent agencies. The corresponding figures for Hispanic employees showed them meeting or exceeding the RCLF in 6 of the 22 agencies and Asian employees in 15 of 22. Black employees met or exceeded the RCLF in 22 of the 22 agencies included in the report. *FEORP*, FY 2000, pps. 14, 20, 26, 38.

²⁹ Memorandum, Sarah F. Jaggar, Managing Director for Goal 3 Operations (March 22, 2001).

GAO Permanent Hires — 542 Total (1/1/97 – 12/31/00)³⁰

**51.3% female
48.7% male**

72% under 40

**94.3% no disability
4.8% non-severe
.9% severe**

WM	WF	BM	BF	AM	AF	HM	HF
207	205	29	37	20	28	8	8
38.2%	37.8%	5.3%	6.8%	3.7%	5.2%	1.5%	1.5%

Interns -- 305 (1/1/97 - 12/31/00)

**60% female
40% male**

98% under 40

**96.4% no disability
3.3% non-severe**

WM	WF	BM	BF	AM	AF	HM	HF
101	123	9	30	7	22	6	7
33.1%	40%	3%	10%	2.3%	7.2%	2%	2.3%

Interns Offered Positions

**59.5% female
40.5% male**

97% under 40

**96.3% no disability
3.7% non-severe**

WM	WF	BM	BF	AM	AF	HM	HF
35%	40%	1.8%	8.5%	2.4%	8%	1.2%	3.1%

³⁰ Applicants provide information about their race/ethnicity, gender, and disabilities on a voluntary basis. The data were too inconsistently provided to form bases from which analyses of applicant data could be conducted. For example, in FY 2000, GAO had 3,121 applicants for employment. Of those applicants, 1,999 (64 percent) did not disclose their race/ethnicity on their application forms; 1,427 (46 percent) did not disclose their gender. GAO's "Applicant Questionnaire", which is attached to all applications, defaults to "Not Disclosed" in the online version.

Interns Accepting Positions

55% female	96% under 40	97% no disability
45% male		3% non-severe

WM	WF	BM	BF	AM	AF	HM	HF
40%	34%	1.1%	10%	2.2%	7.5%	2.2%	3%

An integral component of a successful recruitment program is the retention of the new employees. In particular, GAO expends a substantial amount of staff time and resources conducting a comprehensive search for new employees and, subsequently, invests a great deal in providing training, equipment, and support to new staff. Its retention efforts show that, as of February 28, 2001, GAO lost 23 percent of the permanent employees it hired between January 1, 1997 and December 31, 2000:

Permanent Hires (1/1/97 - 12/31/00) Who Have Left GAO (122)

43% female	72% under 40	92% no disability
57% male	19% 40-50	5% non-severe
	9% 50-60	3% severe disability

WM	WF	BM	BF	AM	AF	HM	HF
58	37	9	8	3	6	0	1
48%	30%	7%	7%	2%	5%	0	1%

Nearly all (98%) of the employees who left GAO resigned or went to another agency. The rest were terminated; discharged during probation; had appointments that expired; or resigned in lieu of involuntary action.

Conclusions

Although GAO's recruitment process does not focus on diversity as a primary goal, the consistency of the diversity in the Agency's ranks and among the new hires indicate that there is a continuing effort to improve the Agency's eeo profile. Even with its success at maintaining a diverse workforce, GAO is currently developing a more systematic approach to attracting minority candidates to the Agency.

As underrepresentation in protected groups, for the most part, does not appear to be a problem at GAO, many of the affirmative policies and practices that OPM mandates or encourages have not needed to be implemented at the Agency. Nonetheless, GAO does maintain a continuing program for recruitment of minorities and women that includes many of the components of OPM's regulations. For example, a number of the schools that the Agency has targeted for its recruiting efforts are large state universities with diverse student bodies or have a large number of minority students and its vacancy announcements are widely disseminated to a varied audience. In addition, the Agency designates responsibility for program implementation to a separate office; maintains an agency-wide recruitment plan that is updated at least every year; and makes periodic determinations of underrepresentation by job category and by protected group. Unlike agencies in the Executive branch, GAO does not advertise positions as part-time and, therefore, has no specific recruiting initiatives directed at part-time positions. The Agency's failure to comply with this aspect of OPM's regulations could have an adverse effect on female applicants.³¹

The Board also notes two areas of concern revealed in its study of recruitment at the Agency. Although GAO's overall eeo profile has remained fairly constant throughout the past decade,³² black males, who constitute 5.7 percent of the Agency's workforce, comprised 3 percent of the intern population during the time period of the Board's study, 1.8 percent of interns offered positions, and 1.1 percent of interns accepting positions.

In addition, although this study did not focus on retention levels at GAO, the Board also notes that retention figures for the new hires show that 9 of the 29 (31%) black males who were permanent hires left the Agency during the same time period.³³

The Board suggests that GAO examine its internship program with an eye toward expanding the pool of qualified black candidates. To accomplish this, the Agency may need to supplement recruiting efforts by more assiduously using existing networks within its own ranks for disseminating job information and involving minority group organizations in its college-level recruiting efforts. GAO may also consider adding more recently-hired black employees to its New Hires Advisory Group.

Because the minority recruitment program as administered by OPM requires a finding of underrepresentation as its predicate, the provisions of that program that call for remedial action do not apply to GAO. As it stands, however, GAO's overall approach to minority recruitment, which includes vigilance in monitoring trends that could lead to underrepresentation, comports with the mandates of 5 U.S.C. §7201.

³¹In its study that resulted in a report entitled *The Use of Alternative Work Arrangements at GAO* (March 2001), the Board found that 90 percent of GAO employees who worked part-time during the course of the Board's study were female.

³²In October 1991, the Agency had 5,194 employees; in April 2002, there were 3,071 employees. The eeo profile of GAO at those times (with the 2002 percentages in parentheses) follow: 71.62% (70.69%) white; 21.02% (20.32%) black; 3.27% (4.79%) Asian; and 3.91% (4.1%) Hispanic.

³³In comparison, 58 of 207 (28%) white males, 37 of 205 (18%) white females, 8 of 37 (22%) black females, 3 of 20 Asian males (15%), and 1 of 8 Hispanic females (12.5%) left the Agency during the same time period.



GAO

Accountability • Integrity • Reliability

United States General Accounting Office
Washington, DC 20548

May 17, 2002

Ms. M. Gail Gerebenics
Director, EEO Oversight
Personnel Appeals Board
Suite 560
Union Center Plaza II
Washington, D.C. 20548

Dear Ms. Gerebenics:

This letter responds to the Personnel Appeal Board's (Board) report on the study of minority recruitment at GAO, dated May 1, 2002. We appreciate the opportunity to provide comments on the Board's report.

The Comptroller General has repeatedly stated that the most important resource of the General Accounting Office is its people, and therefore has directed that continuous attention be paid to their recruitment, development, recognition, and retention. He has also repeatedly emphasized his commitment to sustaining a diverse, highly-skilled workforce at GAO. We are pleased that the Board's report recognizes this commitment and acknowledges GAO's efforts to recruit minorities when active recruiting re-commenced after the hiring hiatus of the mid-1990's.

In Chapter IV on Conclusions, the report (1) expresses concern about GAO not advertising positions as part-time and having no specific recruiting initiatives directed at part-time positions; (2) cites the Board's concerns about retention of black males and Asian females; and (3) suggests that GAO consider certain actions to expand the pool of qualified black candidates/applicants. In the following sections, we address each of these areas.

Part-Time Positions

In Chapter IV on Conclusions, the report expresses concern about GAO not advertising positions as part-time and having no specific recruiting initiatives directed at part-time positions, stating on page 16 that this "could have an adverse effect on female applicants."

We do not believe we have a problem attracting and retaining females at this time. As noted on report pages 10, 11, 12, and 13, GAO is currently successfully hiring female employees. Attrition of females hired under permanent appointments during the study period ran about 19 % compared to 27% of newly hired males (see page 15).

Further, we provide opportunities for male and female employees to work a part-time schedule, as needed. We also allow employees to work flexible schedules, and where and when appropriate, to work from home. This is part of our concerted effort to provide a family-friendly workplace.

We will continue to monitor hiring and attrition rates for females, and will consider changes should we identify problematic patterns.

Attrition of Minorities

When reviewing the Board's report, we noted that the statistics cited sometimes referred to the total number of employees hired by GAO during the study period (permanent and time-limited appointments, totaling 669 employees) and sometimes referred to only the total number of permanent employees hired (542 permanent employees). In the detailed comments attached to this letter, we provide annotations and clarifications to ensure that the statistics have a consistent base (especially relevant to pages 13, 15, and 17).

In particular, this is important when discussing attrition. We believe that including employees hired on time-limited appointments in attrition (page 15) leads to confusion, because the attrition of employees on time-limited appointments is required at the end of specified periods as a condition of their appointments.

Consideration of attrition rates for only permanent hires, of which there were 542 during this period, changes the attrition rates of minorities cited in the report. Specifically, in Chapter IV on Conclusions (page 17), the Board expresses concern about the attrition rate of black male new hires (cited as 52%) and Asian female new hires (cited as 46%). Using permanent hires only in these calculations changes the attrition rates to 31% for black male new hires and 21% for Asian female new hires. Black males were still the highest attriting group during the study period, but Asian females attrited at a rate (21%) slightly lower than the rate for all groups combined (23%). We believe this presents a more accurate picture of attrition of these two minority groups.

However, we are concerned in general about attrition, including of minorities, and have several efforts underway to monitor and address attrition problems. One major initiative involves getting better information about the reasons that individuals leave GAO, and getting feedback on what permanent employees and interns think about working here. With this information, actions can be taken to address problematic trends. Two questionnaires will help us identify problems:

- Exit questionnaire for permanent employees: In late December 2001, we implemented a new exit questionnaire designed specifically to help us identify trends, patterns, or problems that may influence staff to leave. The questionnaire asks staff to identify their race or ethnicity, thereby enabling us to address attrition for all categories of minority staff.
- Exit questionnaire for summer interns: We are currently revising the exit questionnaire for interns; it will be in place during Summer 2002. The new *intern exit questionnaire is based on the exit questionnaire for permanent employees*, and will help us identify ways to improve our internship program.

Expanding the Pool of Qualified Black Candidates/Applicants

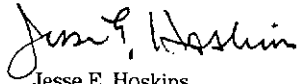
In Chapter IV on Conclusions, the Board suggests that GAO consider certain actions to expand the pool of qualified black candidates/applicants. We appreciate these concerns and suggestions and we will consider them as we plan our recruiting efforts for the 2002-2003 school year. These include better using internal networks for disseminating job information, and working more closely with recently-hired black employees as members of the New Hire Advisory Group and in other ways to improve both recruiting and retention. Other initiatives related to this include:

- Evaluating the universities on which we focus: The Board noted that we added several universities to our "focus" list in FY2002 specifically to expand our recruiting efforts at schools with high percentages of minorities. During Summer 2002, we will evaluate the effectiveness of the outreach efforts to these schools. We will add or drop schools, as appropriate, in Fall 2002 to further refine the effectiveness of these relationships.
- Increase dissemination of job announcements and job information to minority group organizations: In Fall 2002, GAO will implement a new web-based system for posting job announcements and receiving applications from interested candidates. One advantage offered by this new system is increased ability to automatically send (email) job announcements to bulletin boards and web sites of minority group organizations. At this time, we are building the list of sites that will routinely receive this information, and have asked the minority group representatives of GAO's Employee's Advisory Council to recommend organizations and web sites to be included for dissemination of these notices.

In reviewing the Board's report, we identified a few other points that we recommend be clarified to more accurately portray certain matters. Attachment I enumerates those points.

Thank you again for the opportunity to provide these comments. We appreciate the work of the Board in conducting this study.

Sincerely,



Jesse E. Hoskins
Human Capital Officer

Attachment

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