

The Employment of Asian Americans & Pacific Islanders at GAO



PERSONNEL APPEALS BOARD

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Personnel
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Hand Delivery

The Honorable Gene L. Dodaro
Comptroller General of the United States
U.S. Government Accountability Office
Room 7B02
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Dodaro:

Pursuant to the authority granted to it under the Government Accountability Office Personnel Act of 1980, the Personnel Appeals Board has statutory responsibility to oversee equal employment opportunity at GAO. The Board performs this function through a process of review and assessment that includes the conduct of studies and the preparation of evaluative reports containing its findings, conclusions and recommendations. In exercise of that authority, the Board is issuing the attached report on the Employment of Asian Americans and Pacific Islanders at GAO.

Sincerely,

A handwritten signature in cursive script, reading "Mary E. Leary", is positioned above the printed name.

Mary E. Leary
Chair

Enclosure

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The Employment of Asian Americans and Pacific Islanders at GAO

Chapter I

Introduction

In the course of conducting its EEO Oversight studies and monitoring employment trends at the U.S. Government Accountability Office (GAO or the Agency), the Personnel Appeals Board (PAB or the Board) pays particular attention to matters that may be affecting employees who are members of protected groups, whether or not that specific issue is the subject of a current oversight study.¹

In the course of other studies, the Board has noted that Asian American and Pacific Islander (AAPI) employees at GAO are well-represented across the Bands within the analyst population but this degree of representation does not carry over into the Senior Executive Service (SES).² The Board has also taken note of the fluctuations in

¹ The Personnel Appeals Board oversees the Agency's employment policies, procedures, practices, and regulations relating to discrimination on the bases of race, color, religion, national origin, political affiliation, age, gender, marital status, and disability. 31 U.S.C. §732(f)(2)(A). *See also*, 4 C.F.R. §28.91, §28.92. In furtherance of its oversight mandate, the Board conducts studies of selected issues and then prepares evaluative reports containing its findings and recommendations to the Agency. Some recent examples of Oversight topics include the retention of newly-hired employees, the Senior Executive Service (SES), and the employment of Hispanics at GAO. The Board's reports can be found on its web site, www.pab.gao.gov, under the link to EEO Oversight.

Twice a year since 1991, the Agency has sent the Board internal data on hires, promotions, and separations by race, national origin, age, and disability, and further broken down by gender, in order for it to observe movement over time. The package also includes a current demographic picture of the Agency.

² GAO uses the Office of Personnel Management (OPM) Standard Form 181 (SF 181) for ethnicity and racial identification which includes separate categories for Asian and Native Hawaiian (NH) or Other Pacific Islander (PI). For purposes of this report, because there are

the number of Asian American females separating from GAO in certain years. In addition, the Agency's 2009 Workforce Diversity Plan made the point that diversity of leadership at GAO is a concern, generally, for employee groups and was specifically noted by the Asian American Liaison Group (AALG).³ In response to that concern, GAO included in its action plan a study of the development of employee-networking groups in order to enhance the retention of both African American males and Asian American females.⁴ In this study, the Board reviewed the AAPI representation throughout GAO and specifically examined whether there are barriers to career advancement.

Methodology

To fully develop the issues noted above, the Board studied the history of employment of Asian Americans in the Federal Government and at GAO over the past two decades, in an attempt to identify what factors have affected their career trajectories, either positively or negatively, within the Federal government, generally, and at GAO, specifically. The study entailed a thorough review of GAO's internal practices and procedures in order to identify any cultural, environmental, or

only two employees at GAO who identify themselves as NH/PI, the category of AAPI will be defined as including anyone "having origins in the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam," and anyone "having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands." OPM Standard Form 181, rev. August 2005.

³ *Workforce Diversity Plan*, U.S. Government Accountability Office, at 25 (June 2009) [*2009 Diversity Plan*].

⁴ *Id.* at 32.

organizational factors at the Agency that might either limit or foster employment opportunities for Asian Americans. In addition, the Board surveyed GAO's Asian American employees, as well as a random sample of the rest of the workforce for comparison purposes.⁵

As an integral part of data collection for this project, the Board used the survey to elicit perceptions about GAO's culture or organizational factors that have either limited or fostered employment opportunities and/or career advancement for Asian Americans at GAO. The survey was structured in a way to allow demographic comparisons at a number of levels beyond race, gender and national origin so that the Board was able to review results within categories such as pay bands and length of service at the Agency. Although there are references to the survey throughout this report, Chapter III reviews the results in depth.

Through the Office of Personnel Management's Leadership and Talent Management Solutions, focus groups were also conducted to explore the issues concerning the advancement of AAPIs at GAO. The results of those focus groups are discussed in Chapter II.

Background: GAO

In 1991, GAO had a workforce of nearly 5,200 employees, 170 of whom were Asian Americans (3.3%). At that time, the vast majority (78.2%) of the Agency's Asian American employees (135) could be found in the evaluator and evaluator-related ranks.

⁵ The Board entered into a contract with Leadership & Talent Management Solutions (LTMS) at OPM to develop and administer its survey.

Asian Americans made up 3.7% of evaluator and evaluator-related staff (135 of 3555). Band IIIs made up 12.8% of the evaluator corps; Asian Americans held 2.4% of the Band III positions.⁶ There were four Asian Americans (2.9%) in the SES out of a corps of 140.⁷

As of September 2010, the Agency had a workforce of 3,332 of which 262 (7.9%) identified themselves as Asian American or Pacific Islanders, more than twice the percentage as in 1991.⁸ Just over 86% (226) of the Asian Americans and Pacific Islanders at GAO were in the analyst/specialist ranks. AAPI employees comprise 9% of the analysts and specialists at the Agency (2525) and 5.9% of the Band III analysts (27/458).⁹ In 2010 there were five AAPIs¹⁰ in an SES corps of 120 (4.2%) with an additional two Asian Americans occupying Senior Level (SL) positions.

⁶ GAO analysts, who were previously called evaluators, are divided into Bands. Band III is the primary analyst feeder pool for the SES; MS-II and PT-IV employees in the Administrative Professional and Support Staff (APSS) corps are also eligible to apply for SES vacancies.

⁷ SES covers managerial, supervisory, and policy positions above grade 15 that are not filled by Presidential appointment with Senate confirmation. *SES Guide*, U.S. Office of Personnel Management, at 1 (January 2001).

⁸ In September 2010, the gender breakdown of the AAPI population at GAO was 68.3% female and 31.7% male.

⁹ The corresponding figures for other groups are: Black employees are 11.9% of the analyst corps and 11.3% of the Band IIIs; Hispanic employees are 5.3% of the analysts and 3.7% of the Band III analysts; and, white employees are 73% of the analysts and 79% of the Band IIIs.

¹⁰ On June 27, 2011, shortly before this report was issued for comment, the Comptroller General announced the appointment of nine new members of the SES, one of whom is an Asian American female.

Background: Executive Branch

The increase of AAPI employees within the Executive Branch has been steady throughout the past several decades.¹¹ In 1984, they constituted 2.8% of Executive Branch employees; 3.6% in 1990; 4.5% in 1998, 4.5% in 2000, 5.3% in 2006 and 5.6% in 2010.¹²

In 1990, when the percentage of AAPI employees in the Executive Branch was 3.6%, they were 2.9% of the GS-14-15¹³ ranks but made up only .9% of the senior pay levels.¹⁴

¹¹ During the last century, Asian Americans did not immigrate to the United States in significant numbers until the passage of the Immigration Act of 1965, Pub. Law 89-236, which greatly raised the limits on the number of immigrants from outside the Western Hemisphere who were permitted to enter the country. In 1882, Congress passed the Chinese Exclusion Act which was not repealed until 1943. From 1943 until the passage of the 1965 Act, only 105 nationals a year from China, far and away the most populous of the Asian countries, were permitted to seek naturalization. Effective in 1968, 20,000 people a year from any one country outside of the Western Hemisphere, until an overall cap of 170,000 was reached, were allowed to seek naturalization. That cap has been increased a number of times since then. Asians now make up about 5% of the total population of the United States. *Facts for Features, Asian/Pacific American Heritage Month: May 2010* U.S. Census Bureau News (March 2, 2010).

¹² *The Fact Book*, Federal Civilian Workforce Statistics, 1997 Edition, at 28; *Demographic Profile of the Federal Workforce as of September 30, 1998*, Federal Civilian Workforce Statistics, U.S. Office of Personnel Management (1999) [1998 Demographic Profile], at 7; *Demographic Profile of the Federal Workforce as of September 30, 2000*, Federal Civilian Workforce Statistics, U.S. Office of Personnel Management (2001) [2000 Demographic Profile], at 7; *Demographic Profile of the Federal Workforce as of September 30, 2006*, Federal Civilian Workforce Statistics, U.S. Office of Personnel Management (2007) [2006 Demographic Profile], at 8; *Federal Employment Opportunity Recruitment Program Report*, Office of Personnel Management (2010) [2010 FEORP Report], at 33.

¹³ The 1990 data from OPM only contains information for the GS-14-15 grouping. *2000 Demographic Profile*, at 7.

¹⁴ *2000 Demographic Profile* at 7, 11. Senior Pay Level employees are those employees in the Senior Executive Service, Senior Foreign Service, and other employees earning salaries above

By 1998, AAPI employees held 5.2% of the GS-15 slots but constituted only 2.1% of the senior pay levels, the largest drop off from the feeder pool of any racial or ethnic group.¹⁵ In 2006, AAPIs were 7% of GS-15 employees and only 3.8% of employees in the senior pay levels.¹⁶ In 2010, AAPIs made up 6.3% of employees in the GS-13-15 group and 6.4% of employees in the senior pay levels.¹⁷

According to the 2010 *Federal Equal Opportunity Recruitment Program Report* published by the Office of Personnel Management, AAPIs constitute 5.6% of the Federal workforce and 4.3% of the Civilian Labor Force (CLF).¹⁸ AAPIs make up 6.5% of the GS 13-15 grades and 6.1% of the Senior Pay Levels. OPM data from June 2010 shows that only 3.0 % of the SES in the Executive branch were AAPIs.¹⁹

grade 15, step 10 of the General Schedule, but excludes those employees under the Executive Schedule (pay plan EX). It also includes employees that are in non-executive positions above GS-15, *i.e.* "those for which technical expertise, not leadership, is paramount" (Senior Level (SL) and Scientific and Professional (ST) positions). *SES Guide*, at 1, 6-7; see also, *supra*, footnote 7.

¹⁵ *1998 Demographic Profile*, at 39. Black employees were 5.9% of the GS-15 group and 6.7% at the senior pay levels; Hispanics were 3.1% of the GS-15s and 2.9% at the senior pay levels; White employees were 85.1% of the GS-15s and 87.6% of the senior pay levels. *Id.* at 39.

¹⁶ *2006 Demographic Profile*, at 7.

¹⁷ *2010 FEORP Report*, at 35. 2010 data only contains information for the GS-13-15 grouping, thus it is unclear what percentage of that number is GS-15s.

¹⁸ *Id.*, at 33. The Civilian Labor Force (CLF) is defined as all non-institutionalized persons 16 years old or over who are employed or unemployed and seeking work. To determine the Relevant Civilian Labor Force (RCLF), an agency such as GAO extracts those civilian occupations that are directly comparable to its job series from the general CLF data. U.S. Bureau of Labor Statistics (www.bls.gov). Black employees comprise 17.7% of the Federal workforce (FW) with a CLF percentage of 10%; Hispanics participate in the FW at 8% but are 13.4% of the CLF; White employees are 66.2% of the FW with a CLF participation rate of 70.4%. *2010 FEORP Report*, at 9.

¹⁹ *SES Facts & Figures*, Office of Personnel Management, June 2010 (http://www.opm.gov/ses/facts_and_figures/demographics.asp); see also, *supra*, footnote 13.

Issues and Perceptions

Understanding the employment patterns of Asian Americans in the Federal government has always presented somewhat of a conundrum. Based on graduation rates and the number of advanced degrees attained, AAPI employees are more educated than members of other protected groups and hold positions in Federal agencies that, on the average, exceed the grade levels of positions held by members of other protected groups.²⁰ However, the EEOC noted that Asian Americans are underrepresented in executive and management positions when compared to their overall rate of participation in the Federal workforce.²¹

There have been a number of theories posited over the years for the reasons for the lack of AAPI participation in the executive and managerial ranks. Some commentators have suggested that stereotypical views of Asians persist in such a way that it is widely believed that AAPI employees prefer to not take on leadership positions; that they have finely honed their scientific and technical skills in lieu of their management skills; and, due to cultural differences, that they have not assimilated into

²⁰ AAPI students had the highest college graduation rate, followed by White, Hispanic, Black, and American Indian/Alaska Native students. Approximately 67 percent of AAPIs, compared with 60 percent of Whites, 48 percent of Hispanics, 42 percent of Blacks, and 40 percent of American Indians/Alaska Natives graduated in six years or less. In addition, the percentage of AAPIs who attained a master's degree in 2009 (21 percent) was higher than that of their peers from all other races/ethnicities: 9 percent of Whites, 4 percent of Blacks, and 2 percent of Hispanics attained a master's degree in 2009. *Condition of Education 2010*, National Center for Education Statistics, U.S. Department of Education, at 72-74.

²¹ *Issues Facing Asian Americans and Pacific Islanders (AAPIs) in the Federal Workforce*, Meeting of the Equal Employment Opportunity Commission (EEOC) (July 2008). Statement of Carlton M. Hadden, Director, Office of Federal Operations [hereinafter Hadden Statement].

American society to the extent that members of other protected classes have.²² Those explanations, and others like them, seem to suggest that the “glass ceiling” or “sticky floor” that AAPI employees may face when attempting to move into management positions in the Federal sector may be a result of self selection or choosing to opt out of opportunities when they present themselves.

Observations differ about the lack of AAPI participation in the upper echelons of management emerge depending on the source. The Equal Employment Opportunity Commission convened an AAPI Work Group to look at federal sector employment, special emphasis programs and the complaints process.²³ The Group identified five barriers that the AAPI population faces in the workplace:

- Perception as a “Model Minority” which belies the heterogeneity of the AAPI population with respect to profound economic, educational, and cultural diversity;²⁴
- Language or accent discrimination which is a by-product of the fact that, according to a recent U.S. Census Bureau report, 15% of the population who speaks another language at home is speaking an Asian or Pacific Island language.²⁵ The

²² *Id.* Statement of Kuan-Teh Jeang, Scientist, National Institutes of Health (NIH) and President, Society of Chinese Bioscientists in America [hereinafter Jeang Statement]. See also, Jeffrey Mervis, *A Glass Ceiling for Asian Scientists?*, Science 2005, Vol. 310:606-607, October issue, <http://www.sciencemag.org/cgi/content/full/310/5748/606>; Roli Varma, *Asians in the U.S. Public Service: Diversity, Achievements and Glass Ceiling*, United Nations Expert Group Meeting on Managing Diversity in the Civil Service, May 2001, <http://unpan1.un.org/intradoc/groups/public/documents/un/unpan000869.pdf>.

²³ *Asian American and Pacific Islander Work Group Report to the Chair of the Equal Employment Opportunity Commission* (2009) [hereinafter *AAPI Work Group Report* or *The Group*].

²⁴ For example, 50% of single-race Asians over 25 hold a bachelor’s degree or higher, compared to 28% for all Americans but that is true for only 15% of Native Hawaiians and Other Pacific Islanders. *Facts for Features*.

²⁵ Spanish is the most commonly spoken non-English language; Chinese is the next most common, with Tagalog, Vietnamese, and Korean not far behind. Within the AAPI population who speak a language other than English at home, 51.4% report that they also speak English

foreign-born AAPI were the only major language group for whom those speaking English less than “very well” outnumbered those speaking English “very well.”²⁶

- Perceptions of foreignness which can lead to the belief that the AAPI population is unwilling or unable to assimilate into the American culture;
- Perceptions of social deficiency which can lead to exclusion from social networks and from positions that require social skills;
- Perception of lack of leadership skills related to the impression that Asian Americans are unassertive or more interested in being good team players.

The Work Group expanded on its barrier analysis by noting that many of the widely held perceptions of the AAPI community are inherently paradoxical in that they are both positive and negative simultaneously: *i.e.*, the “model minority” is highly valued in the workplace but its strong cultural values have, somehow, become a liability.²⁷

The report that the Work Group ultimately issued, found:

[W]hen one looks at agency specific numbers and the participation rate of AAPIs in management and senior level positions, unfavorable trends become evident. Workforce data from numerous federal agencies suggest that there may be a glass ceiling at the highest levels of federal agencies that may be impeding the careers of persons of Asian or Pacific Island descent.²⁸

very well. *Language Use in the United States* at 7, American Community Survey Report, U.S. Census Bureau (2010).

²⁶ *Id.* at 3.

²⁷ *AAPI Work Group Report* at 3.

²⁸ *Id.* at 8.

Issues at GAO

GAO's percentages with respect to its AAPI employees are better than those of the Executive branch. However, there are still issues remaining regarding AAPIs at GAO. One issue is that the number of AAPIs in the SES is not representative of their presence in the GAO population. Thus, there remains a concern about the representation of Asian Americans at the Agency in the Senior Executive level.²⁹

As noted earlier, in June 2011, GAO's most recent ECADP contained nine candidates appointed to the SES, one of whom was an AAPI female. This increased the number of AAPIs in the SES to 6 (4.7%). The prior seven Executive Candidate Assessment and Development Program (ECADP) classes, spanning nine years, had in total three Asian American females and one Asian American male selectees. Only four Asian Americans applied during that time span; and four of the seven ECADP classes had no Asian American applicants. Between 2001 and 2009, 84 persons were selected for Career Appointment to SES, 12 persons selected for Comptroller General (CG) Career Appointments to the SES and 53 selected for Limited Term Appointments. One of the 84 was an AAPI female and one was an AAPI male. One of the 12 CG Career Appointments was an AAPI male; three of the 53 Limited Term Appointments were

²⁹ See *Workforce Diversity Plan*, U.S. Government Accountability Office (2010) [*2010 Diversity Plan*], at 37. In its comments, the Asian American Liaison Group expressed concerns about the participation of Asian Americans in leadership roles at GAO, particularly at the SES and Band III levels. In its response to the AALG, the Agency noted that representation of AAPI employees is "heading in the right direction" as there were improvements in the numbers in both the SES/SL and Band III from 2009-2010. "Specifically, the representation of Asian Americans at the SES/SL improved from 5.0 percent in 2009 to 5.3 percent in 2010 and from 5.1 percent in 2009 to 5.4 percent in 2010 at the PE-Band III level." *Id.*

AAPI males. Over the nine year period, only one Asian American female was selected out of the 149 appointments to a career appointment SES position.

Another issue involves the concentration of AAPIs in certain teams and offices. Based on the statistical information, there appears to be a concentration of Asian American employees (22%) on two teams -- Financial Management and Assurance (FMA) and Financial Markets and Community Investments (FMCI). The other issue is that more than one-third of AAPI employees at GAO are concentrated in field offices. The majority of them are in Los Angeles, San Francisco and Seattle.

There have also been noticeable fluctuations in the Agency's ability to retain Asian American female employees. In 2003 and again in 2008, unlike other female groups, Asian American females separated from the Agency at rates that were higher than their representation in the workforce. See Table 1. In 2003, there were 121 Asian American women at GAO, making up 3.7% of the workforce. During that year, 17 of them left the Agency, comprising 5.7% of GAO's total separations. In 2008, Asian American females were 4.8% of the workforce but 5.6% of the voluntary separations.

When asked to comment on GAO's Diversity Plan, the Asian American Liaison Group posited theories about the fluctuations in the separation rates of AAPI women. The Group suggested that GAO's culture is not tolerant of people who are different, that some of the women in question reported difficult supervisors, and that there is inadequate time for staff development due to the pace of the work.³⁰

³⁰ *Workforce Diversity Plan*, U.S. Government Accountability Office (2008) [*2008 Diversity Plan*], at 16.

Chapter II

The Senior Level Positions

According to a recent Career Advancement Survey conducted by the Merit Systems Protection Board (MSPB), minority employees, in general, were more likely than White employees to indicate their intentions to apply for senior level positions. Among respondents who said that they did not intend to apply for higher level positions, Asian Americans and Pacific Islanders most often stated as a reason for not applying that they were "comfortable with their current level of responsibility."³¹

Office of Personnel Management data from 2010 reflects Asian Americans as 5.6% of the Federal workforce. The most recent data from June 2010 shows that Asian Americans were 3.0% of the SES in the Federal workforce.³² By comparison, in June 2010, African Americans made up 9.4% of the SES, while being 17.7% of the Federal workforce; and Hispanics made up 3.8% of the SES, while they are 8% of the Federal workforce.³³

In 2008, in response to a request from the Chairman of a congressional subcommittee, the Agency's Inspector General (IG) prepared a report to determine, among other issues, "whether GAO's diversity efforts are achieving better

³¹ *Fair and Equitable Treatment: Progress Made and Challenges Remaining*, U.S. Merit Systems Protection Board at 52 (2009) [hereinafter *Fair and Equitable Treatment*]. MSPB drew their survey sample from the pool of full-time permanent non-postal Federal employees.

³² *SES Facts & Figures*, OPM, June 2010.

³³ *Id.*; *2010 FEORP Report*, at 13, 23.

representation of women and minorities in top leadership.”³⁴ The IG report noted that GAO’s leadership is generally more diverse than both the Executive branch and the Civilian Labor Force, but also noted that gaps remain in the participation of women and minorities in the agency’s leadership, particularly singling out African American and Asian American women, as well as Hispanics and people with disabilities.³⁵

Between 1991 and 2010, the total number of employees at GAO decreased from nearly 5,200 to 3,332 because of the Agency downsizing. During this period, the number of Asian Americans in the SES increased from four in 1991 to five in 2010 (and six in 2011) but the percentage of Asian Americans in the SES level compared to the total workforce more than doubled as a result of hiring and separations.

From 2000 through 2009, there were a total of 91 internal promotions to SES/SL positions; 75 of them went to White employees (82.4%). During this same period, five AAPI employees (5.5%) were promoted to the senior ranks. Three Asian American males were promoted in 2001; one AAPI male in 2002, one AAPI female in 2003. In 2011 one Asian American female was promoted.

The results from the Board’s survey with respect to the reasons offered by AAPI employees at GAO for their lack of interest in pursuing SES positions differed in the number of responses from that of other demographic groups. As the primary reason,

³⁴ *Diversity at GAO: Sustained Attention Needed to Build on Gains in SES and Managers*, Report to the Chairman, Subcommittee on Federal Workforce, Postal Service, and the District of Columbia, Committee on Oversight and Government Reform, House of Representatives, GAO-08-1098 (September 2008).

³⁵ *Id.* at 5. The IG noted that, at the time of her report, the percentages of African American and Asian American women in the SES were not increasing as fast as their overall participation in the GAO workforce.

44% of White employees indicated that they would not enjoy the work. The response that garnered the highest response rate (67%) from Hispanics was that such a position would interfere with family life. Both African American and Asian American employees believed that they lacked the qualifications and/or the ability to perform the job but at different rates. The 49% of Africans Americans choosing that response was well below the 69% of Asian Americans who opted for the same answer.

Intern Hiring

A large percentage of GAO's entry-level analyst positions are filled from participants in its intern program, which is open to students at the university and graduate levels. Interns who successfully complete at least 10 full-time weeks (or 400 hours) of work are eligible for noncompetitive appointments to GAO analyst, financial auditor, information technology analyst, or other positions for which they qualify. While conversions are not guaranteed to interns, in recent years, GAO has made offers to approximately 72% of them.

In the past decade, the Agency has hired 1,538 employees from the ranks of its interns. Of those, 100 were Asian American females and 53 were Asian American males, totaling 9.9% of the interns hired.

There has, however, been a downward trend with respect to the percentages of Asian Americans in recent intern hires. Asian Americans constituted over 12% of the intern hires in 2002, 2003, and 2004, dipping to 7.3% in 2005 and then rebounding to

11.1% and 11.9% in 2006 and 2007, respectively. There has been a noticeable decline since then, culminating in lows of 6.4% in 2008 and 6.8% in 2009.³⁶

Occupations, Teams and Locations

A comparison of the major occupations at GAO with the data for the Relevant Civilian Labor Force for those positions shows that Asian American employees make up 17.9% of the Computer Scientist job series as compared to their 10.8% RCLF for that series.³⁷ For that same job series, Black employees constitute 17.1% of the employees with an RCLF of 7.8%. In the IT Specialist series, however, Asian Americans hold 9.6% of the positions, which is below their RCLF of 10.8%. In all of the major professional occupational job series at GAO, such as Analyst, Auditor, and Attorney, Asian Americans exceed their RCLF.³⁸

GAO data for 2010 shows that the team with the most Asian Americans on its staff is Financial Management and Assurance (FMA) with 34 out of 267 employees (12.7%), 24 of whom are female. The team with the largest percentage of AAPIs is Financial Markets and Community Investments with 16.7% (24/150). In descending

³⁶ There has been a similar decline in Hispanic and African American intern hires in the past several years. Hispanic intern hires went from 7.3% to 3.7% from 2004 to 2009; African Americans went from 17.5% to 9.3% from 2005 to 2009.

³⁷ *2010 Diversity Plan*, at 72.

³⁸ Asian Americans comprise 7.3% of the analyst corps, with an RCLF comparison of 5.7%; 12.1% of the auditors, with an RCLF of 8.1%; and 4.2% of the attorneys, with an RCLF of 2.8%. Hispanic employees compare unfavorably to the RCLF in the attorney job series but are well above their RCLF percentages in the auditor and analyst series; Black employees at GAO exceed the RCLF in all three of the major job series. *2010 Diversity Plan*, at 14.

order, the next three teams or offices with the highest concentrations of AAPI employees are Information Technology (IT) with 22/156 (14.1%); Applied Research and Methods (ARM) with 20/171 (11.7%); and Health Care (HC) with 23/248 (9.3%).

At GAO, 35.5% (93/262) of the AAPI population work in field offices as compared to 27% of the general population (900/3332).³⁹ In addition, 61.3% (57/93) of the AAPI field employees are located in three of the Agency's eleven field offices: Los Angeles, San Francisco and Seattle. Within those three offices, Asian Americans make up 23.2% (19/82) of the staff in Los Angeles, 17.5% (14/80) in San Francisco, and 20.2% (24/119) in Seattle. GAO's AAPI staff in Washington, D.C. makes up 6.9% (169/2432) of the Headquarters work force.

Separations

Asian American females separated from the Agency at rates well above their representation in 2000, 2003, 2008 and 2009. To use 2003 as an example, 17 of the 121 Asian American females in the workforce left GAO; they comprised 12.7% of all of the female employees (134) who separated from the Agency that year. Of those 17, 12 of them were under 40 years of age.

Overall, for the 10 years in question, females at GAO were 56.3% of those hired and 45.5% of those who separated; Asian American females constituted 67.8% of the AAPI employees hired and 60% of the AAPI separations. Of the Asian American females separating from the Agency over the 10 year period, 72.1% were under 40

³⁹ Nearly 41% (65/159) of the Hispanics at GAO work in field offices as compared to almost 19% (112/900) of African American employees and 27.2% (624/2296) of White employees.

years of age. For Black females, the percentage under 40 who separated was 30.1%; for Hispanic females, the percentage was 59.1%; for White females, 46.9%. Of all of the women who separated from GAO during the last decade, 45.6% were under 40.

The following table shows data from the years in which Asian American women separated from GAO at rates above their participation in the workforce and compares their rates with women in other groups, and the most recent data from 2010.

Table 1: Females, Percentage at GAO & Percentage of Separations
(Select Years)

	% GAO	%Sep	%GAO	% Sep	%GAO	%SEP	%GAO	%SEP
	AAPIF		BF		HF		WF	
2000	2.6	4.2	14.3	8.5	1.6	2.4	29	27.8
2003	3.7	5.7	13.7	8.4	2.0	.7	32.3	29.5
2008	4.8	6.3	12.9	11.1	2.3	3.2	36.1	30.8
2009	4.9	5.7	13.2	8.4	2.3	1.8	36.3	35.7
2010	5.4	4.6	12.8	10.7	2.6	2.6	36.1	41.3

Source: PAB biannual data, GAO Response & 2009 Diversity Plan

The Agency has been tracking data on separations by demographic group and notes in its most recent Diversity Plan that “a different group has separated at a rate higher than their representation in the workforce each year that we have conducted this review.”⁴⁰ Two of the three recent Diversity Plans noted that Asian American females were separating from GAO at a rate higher than their representation in the workforce,

⁴⁰ 2010 Diversity Plan, at 17.

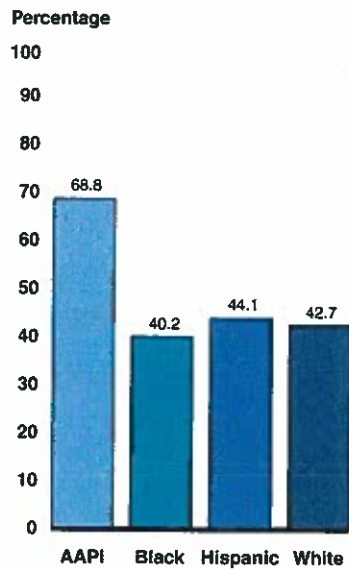
although that rate declined in 2009.⁴¹ In 2010, the separation rate for Asian American females was lower than their representation in the workforce.

Separation issues, however, are not limited to the AAPI female population. In fact, with respect to AAPI employees, in general, the data on separations are not in accordance with that of other populations at GAO. Overall, for the past ten years, Asian Americans have constituted 5.8% of the separations and 9.2% of the new hires but they leave GAO earlier in their careers, more often while still in probationary periods, at younger ages, and for different reasons than their colleagues.

As displayed in Chart 1, the percentages for the past decade show that of the 173 Asian Americans who separated from GAO during that time period, 119 (68.8%) left after 5 years or less. The corresponding percentages for other demographic groups were 40.2% (185 of 460) for African Americans; 44.1% (45 of 102) for Hispanics; and, 42.7% (952 of 2,230) for White employees.

⁴¹ *2008 Diversity Plan*, at 16, reporting a participation rate of 4.8% and a separation rate of 6.3%; *2009 Diversity Plan*, at 22, reporting a participation rate of 4.9% and a separation rate of 5.7%.

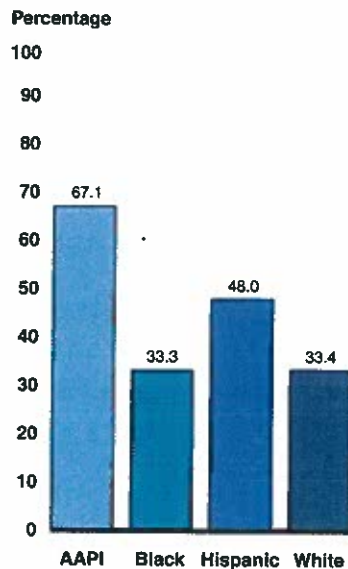
Chart 1: Percentages of Employees Leaving GAO in 5 Years or Less (2000-09)



Source: GAO.

As would be expected given their shorter length of service, the percentage of separating Asian Americans under 40 was 67.1%, compared to 33.3% for Black employees; 33.4% for White employees; and, 48% for Hispanic employees, as shown below.

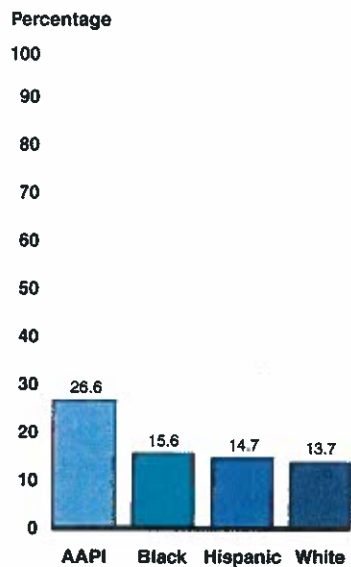
Chart 2: Percentages of Separating Employees 40 & Under (2000-09)



Source: GAO.

Chart 3 shows that the percentage of Asian Americans who left while still in their probationary period (which is two years in length for analysts and attorneys) was 26.6%. For African American employees, the percentage was 15.6%; for Hispanic employees, it was 14.7%, and for White employees, it was 13.7%.

Chart 3: Percentages of Separating Probationary Employees (2000-2009)



Source: GAO.

The majority of employees in every demographic, including AAPIs, who separated from the Agency in the past ten years were analysts, the largest group of employees at GAO. The highest percentage of employees who separated during the past decade did so through voluntary retirement (33.9%), followed by resignation (32.1%) and transfer to another agency (19.9%). By demographic, the largest percentage of Black employees separating (33%) and White employees separating

(36.3%) did so through voluntary retirement. The largest percentage of Hispanics leaving GAO resigned (38.2%) but at lower levels than AAPI employees (56.6%).⁴²

Within the AAPI population at GAO, the types of separation differed from the general workforce in every respect. The largest percentage of Asian Americans separating from GAO did so through resignation (56.6%), followed by transfer to another agency (26%) and voluntary retirement (11%). These figures, of course, do not answer the question of where the employees who resigned are going or why they are leaving so early in their careers.

In reviewing the results of the Board's survey by demographic group, responses by Asian American employees were overwhelmingly favorable on the questions that measure cultural and climate processes at agencies and organizations. The survey gives no indication that the AAPI population is more dissatisfied or more likely to leave early as the data suggest they do.

Appraisal Scores and Promotions

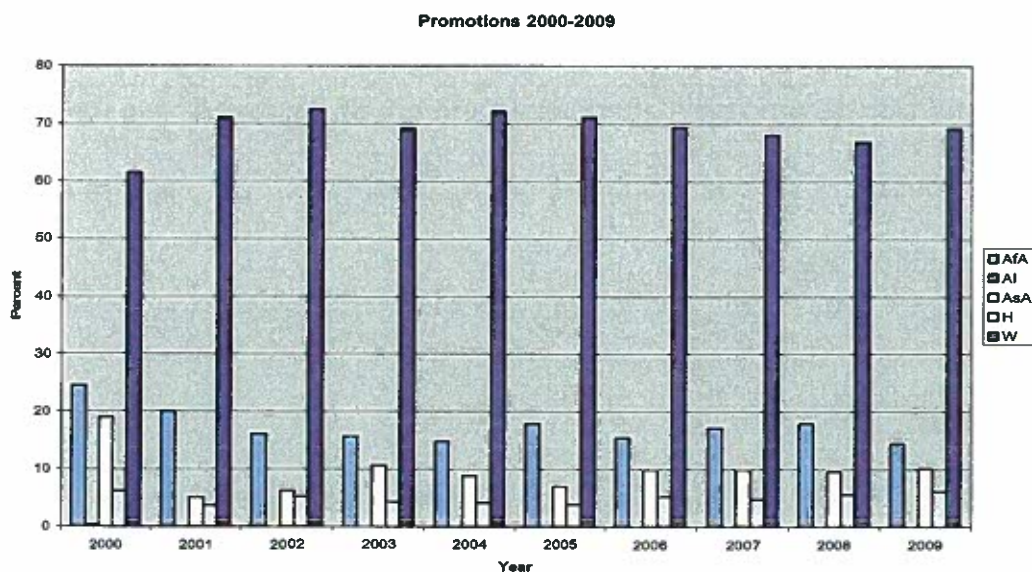
AAPI employees at GAO have high averages in their annual performance appraisal scores when compared to other demographic groups. In both 2005 and 2007, for example, Asian Americans in Bands I and III received higher averages than African American, Hispanic, and White employees. In the 2009 appraisal cycle, AAPI employees in Bands IIA and IIB had average scores that were just a few tenths of

⁴² The percentage of employees separating may be reflective of employment practices within the last 20-30 years where the number of AAPI and Hispanic employees with a significant amount of years of service is not comparable.

points below that of White employees and at the Band III level, the averages for White and AAPI staff were the same.

Asian American employees garnered 8.6% of the promotions in the past decade, with AAPI women receiving 75.7% of the promotions within the AAPI demographic. Overall, women at GAO received 61.7% of the promotions. The following chart shows the yearly non-SES promotions by race and national origin.

Chart 4: Non-SES Promotions by Race and National Origin (2000-09)⁴³



Source: Analysis of GAO data

AAPI employees received more than 10% of the promotions in the group of employees who were under 40 at the time of promotion, which exceeds their overall participation in the GAO workforce. However, in the age group of 40 or over, Asian

⁴³ The abbreviations in Chart 4 stand for: African American, American Indian/Native Alaskan, Asian American/Pacific Islander, Hispanic, and White.

Americans received just 4% of the non-SES promotions; Black employees received 25.5% of the promotions, which exceeds their participation in the GAO workforce.

The chart above shows the trend of promotions over the decade. Of particular note is the trend for African American employees who started out in 2000 with 24.5% of the promotions and then experienced a near steady decline, ending in 2009 with 14.5% of the Agency promotions for that year. For AAPI employees, the story was different. Beginning with 7.4% of the promotions in 2000, the population experienced two years of low percentages but, since 2003, the percentages have steadily increased with a final percentage of 10.1% for 2009. Hispanics started with 6.2% of promotions in 2000 and ended with 6.2% in 2009, although fluctuating between 3.8% and 5.6% and received a total of 4.9% of total promotions for the decade. White employees began with 61.5% of the promotions and ended with 69.5% of the promotions in 2009 and ranging between 69.2% to 72.2% in the intervening years. They received an overall 69% of total promotions in the 10 year time frame.

Chapter III

The Survey

The Board's survey, distributed to everyone at GAO who identified themselves as Asian American or Pacific Islander and to a random sample of the remainder of the workforce, was designed to identify those factors that advance or hinder career development at GAO.⁴⁴ The survey itself consisted of 23 questions that are commonly used in organizational assessments to elicit employee perceptions about an organization's policies, practices, and procedures. In addition, there were 16 additional questions that asked specifically about the participants' experiences at GAO, delving into issues such as promotions and work assignments. Finally, there were six demographic questions, ascertaining gender, race, national origin, age, pay band, length of time at the Agency, and level of supervision. The latter six questions allowed the Board to sort the responses by combinations.

The survey results, overall, are similar to those obtained in GAO's Employee Feedback Survey in that the range of "Favorable" responses was in the 70th and 80th percentiles for all but two of the non-demographic questions. In addition, the survey results for the organizational assessment questions were compared to the Organizational Assessment Survey (OAS) which is an instrument that OPM designed to assess cultural processes related to organizational effectiveness throughout the

⁴⁴ A copy of the survey and a summary of the responses by race and national origin are appended to this report.

Executive branch.⁴⁵ When the GAO results were compared to the OAS, they were more favorable in nearly every response.

When the survey participants were separated into just three groups: White, Asian American, and other, significant differences were found in some of the responses between the White population and the other racial groups. Disaggregating the data further, however, led to the discovery of a few notable differences between the Asian population and other discrete groups particularly with respect to questions about GAO and its practices. Overall, however, the responses of the Asian American employees were favorable.

In the areas in which the responses differed, with a range of response options from "Strongly Agree to Strongly Disagree", Question 20 asked participants to react to the following statement: "Employees have to conform to the GAO way to get ahead in this organization." Overall, 93% of Asian American employees agreed with that statement as opposed to 83% of White employees. Black employees were in 87% agreement and Hispanic employees were in 89% agreement.

Another query on which responses diverged by race or national origin was Question 32, which asked participants who did not get a promotion he or she had applied for: "How important do you believe the following factor was in your non-selection? – Someone else was pre-selected." AAPI employees indicated an 86% agreement with that statement; Black employees were in 91% agreement; and,

⁴⁵ The dimensions covered in the OAS include areas such as rewards, training, innovation, leadership, fairness, employee involvement, communication, work environment, work/family balance, diversity, and supervision.

Hispanic employees were at 88%. However, just 72% of White employees were in agreement with the statement.

In fact, the percentage of Asian American employees who identified the factors that they believed were "Very Important" or "Important"⁴⁶ in their non-selection for promotions that they had applied for differed from those of White employees in every category but one, as Table 2 shows:

Table 2: Reasons Proffered by Employees for Non-selection in Promotions

	AAPI	Black	Hispanic	White
Another candidate was better qualified	53%	53%	41%	60%
Someone else was pre-selected	86%	91%	88%	72%
Selecting official did not like me	25%	22%	17%	13%
My past performance	38%	37%	31%	38%
My past conduct	32%	18%	20%	20%
Race, ethnicity, gender, age, disability	36%	37%	36%	22%

With respect to the final question in that series, which asked how important the respondents believed that race, ethnicity, gender, age or disability was in their non-selection for promotion, nearly half of the White respondents indicated that those particular characteristics were "Not at all Important" whereas just 31% of AAPI

⁴⁶ A response of either "Very Important" or "Important" is considered a favorable response and, thus, they were combined for purposes of survey analysis.

employees, 26% of Black employees, and 32% of Hispanic respondents found their personal characteristics to be "Not at all Important" in their non-selection.

Another area of wide divergence in responses was to the question that asked: "If you are unlikely to apply for a higher level position, what are your reasons?" There were a number of reasons offered as responses, with one being "I do not think I have the qualifications/ability." While just 15% of the White responders selected that as a reason for not applying for a higher level position, 57% of the Asian American employees answering the survey selected that response.⁴⁷

Breaking down the data even further, not one Hispanic, African American or Asian American employee at the Band IIB level indicated that it was "Very Likely" that he or she would apply for appointment to the SES or the Executive Candidate Assessment and Development Program (ECADP) and only 6% said it was "Likely". Among White Band IIB employees, 8% said it was "Very Likely" and less than 5% said it was "Likely" that they would apply. Again, as a reason, 56% of the Asian American Band IIB employees said they lacked either the qualifications or the ability, as opposed to the 22% of White employees who chose that response.⁴⁸

⁴⁷ Hispanic employees also selected that response at a high rate (53%); African American employees, less so (34%).

⁴⁸ The percentage of Hispanic employees who selected that response was 47%; the percentage of Black employees was 41%.

Focus Groups

Once the survey results were analyzed, the Board, in partnership with its OPM contractors, set up three focus groups: two comprised of randomly selected non-supervisory staff and one comprised of randomly selected supervisors/managers. The goal of the focus groups was to help “pinpoint specific factors for why [AAPIs] are not better represented at the higher levels of GAO management.” Focus Group Results at 2.

The general conclusions from the focus groups revealed that the results from the three groups were remarkably consistent. As a whole, Asian Americans at GAO are satisfied with their jobs and GAO, and do not feel that there is discrimination toward them. However, they singled out the perceived impediment of working in the field, instead of at headquarters, as a barrier to their career advancement. As previously noted, a high percentage of AAPI employees are employed in field offices. The participants contended that the field offices are smaller, offering fewer advancement opportunities; employees in the field are less visible to those making promotion decisions; and, field employees do not have many opportunities to work on projects outside their core areas.

GAO data from prior years validated some of these concerns. In 2009, 63% of employees seeking Band III promotions were from Headquarters (HQ); they received 78% of the Band III promotions. Field employees were 39% of those who applied and 22% of those ultimately accorded Band III positions. For Band IIA positions in the same promotion cycle, the percentages were not so starkly different but still showed a

disparity in favor of HQ staff. Headquarters employees were 56% of the applicants and 63% of those selected whereas field employees were 44% of the applicants and 37% of those selected.⁴⁹ However, data from the March 2010 promotion cycle shows some improvement for field employees. For Band III promotions, Headquarters employees made up 58% of applicants and 64% of selectees, while field employees made up 42% of applicants and 36% of selectees. For Band IIA promotions, Headquarters employees made up 68% of applicants and 60% of selectees while field employees were 32% of applicants and 40% of selectees.

The other major concern that emerged from the focus group participants was the lack of mentorship or guidance in establishing a clear road map for advancement at GAO by identifying the specific steps needed for promotion.

⁴⁹ Headquarters employees make up 73% (2432) of the Agency and field employees make up 27% (900).

Chapter IV

Conclusions

In this report, the Board set out to determine whether there are barriers to career advancement for the AAPI population at GAO and, if so, to identify them. In the course of its study, the Board noted the progress of Asian Americans at the Agency over the past two decades. They have nearly tripled their presence, percentage-wise, in the Agency and doubled their percentage in the Band III ranks. Asian Americans have some of the highest average performance appraisal scores in GAO and, in the "under 40" group, receive promotions at rates higher than their participation in the GAO workforce.

In the highest echelons of GAO leadership, however, the story is different. While the percentage of Asian Americans in the SES has increased from 2.8% (5/140) to 4.7% (7/129), the actual number of AAPI employees in the SES has only increased by two since 1991.

Although AAPI employees constituted 9.2% of the overall hires during the past decade and 5.8% of the separations, the Board's analysis of the data showed patterns in the separations of Asian American employees that did not exist with respect to any other demographic group.⁵⁰

The issues involving diversity in Agency leadership and separations that are not the norm for GAO, coupled with the fairly precipitous drop-off for participation in the intern program, raise concerns about the Agency's AAPI population. Although, for the

⁵⁰ See discussion, *supra*, at 16-21.

most part, the survey showed a population that seems satisfied with their careers and the environment at GAO, the responses did not conform with the separation data.

Chapter V

Recommendations

The Board makes the following recommendations:

- The Agency should collect more pointed data relating to separations of its employees. In addition to ascertaining the reason behind an employee's decision to separate, information about where a non-retiring employee is going would provide an understanding of what the Agency can do, if anything, to retain more of its AAPI staff whose resignation levels are higher than other groups. The Agency should fine tune its exit questionnaire to ensure the most detailed responses possible.
- Recently the Policy Partnership for Public Service decried the inadequate workforce planning that "overlooks the pool of experience and diverse talent outside of government at the mid-level and above."⁵¹ The Board urges GAO to consider hiring at these levels as it can have an immediate impact on the Agency's diversity profile in supervisory and management ranks which, in turn, could positively affect employees' views about whether GAO offers sufficient and equal opportunity for advancement. This was also suggested in the Board's recent study of SES.⁵²

⁵¹ *Beneath the Surface: Understanding Attrition at Your Agency and Why it Matters*, Partnership for Public Service/Booz Allen Hamilton (2010).

⁵² *The Senior Executive Service (SES) at GAO*, Personnel Appeals Board (July 23, 2010) at 31. The Board recognized that

acclimating to GAO's unique methodology and culture is difficult, especially at the senior management level, "there are disciplines from which top level recruits would be more able to 'hit the ground running' substantively."

- Since a number of AAPI staff separate earlier in their careers than other groups, GAO should review AAPI participation rates in career development and mentoring programs. If such review discloses that they are not participating in career development opportunities at a level proportionate to their participation in the workforce, then further review is necessary to determine if the issue is one of lack of interest or application or whether it derives from perceptions of lack of opportunity at higher levels.

- The Agency should carefully review its application and selection processes for internal promotions into the SES to determine why the AAPI population has not increased its participation at that level despite being highly credentialed. Such review should include an analysis of how senior level assignments are made and whether AAPI members of the feeder pool are given adequate opportunity to demonstrate leadership and management skills. This is important in attempting to include AAPIs in the Agency succession plans. As noted by the AAPI Work Group,

The projected retirement trends opens up the opportunity to build up a new SES that is more reflective of the American population. . . . Adequate representation of [AAPIs] in the succession pipelines is essential not only to reverse the lack of [AAPI] participation at the SES level, but also in the upper GS levels.⁵³

- In conjunction with the previous paragraph, GAO should review the information available to Band IIs and Band IIIs regarding promotions to a Band III and to the SES level, respectively. Such review should consider whether the information provides a sufficient roadmap for individuals interested in advancing and whether it provides assistance in determining what qualifications are necessary, including an additional and specific focus on regional offices and mission teams where AAPI employees are concentrated. Another recommendation, if not already in practice, is that GAO should

⁵³ *AAPI Work Group Report*, at 14.

review mission teams and regional offices when evaluating promotion and representation data by band level.

- In its recent study of the SES, the Board also suggested that the Agency or O&I should survey its Band III population to determine their level of interest in the SES; their reasons, if any, for opting out of consideration; and whether they perceive barriers in the application process. Additionally, the Board recommends that the Agency or O&I interview AAPI employees who recently applied for SES or SL positions to better understand their experiences in the application process.

Appendix I: Summary of Comments

The GAO, the Board's Office of General Counsel (PAB/OGC) and the Asian American Liaison Group (AALG) submitted comments on the draft report.

The AALG acknowledged GAO's steps to change stereotypical perceptions in the workplace and emphasized the need for sustained efforts, the need for Agency consideration of mission teams and geographic locations where there are concentrations of AAPI employees when reviewing promotions and representation by band level, and recommended additional interviews of Band III employees and AAPI employees who applied for SES positions.

PAB/OGC suggested that GAO address the issue of how management is perceived by its employees, including the AAPI employees, regarding the need to conform to the GAO way to get ahead to insure that such conformance is not over and above what would generally be expected of a federal employee. Further the PAB/OGC raised concern over GAO employees' agreement, including the overwhelming majority of AAPI employees, with the statement in the Board's survey that the primary reason for non-selection was that someone else was pre-selected.

GAO acknowledged the positive gains made over the past few years and the importance of continued focus on increasing minority representation in leadership positions. The Agency also noted plans or activities addressing several Board recommendations including the proposed implementation of a revised survey to gather specific separation data, collection of demographic data on participation in GAO's

mentoring program, and additional focus on sensitizing GAO staff and managers regarding cultural differences and opportunities for shared discussions.

The comments are attached to the report and some climate and additional survey concerns have been incorporated into the recommendations chapter.

Appendix II: Comments



GAO

Accountability • Integrity • Reliability

Memorandum

Date: August 8, 2011

To: Beth Don, Executive Director, Personnel Appeals Board (PAB)

From: Nhi Nguyen, Co-Chair for Operations
Raj Verma, Co-Chair for External Relations
Asian American Liaison Group (AALG)

Subject: AALG comments on draft PAB study, *The Employment of Asian Americans and Pacific Islanders at GAO*

You asked AALG to provide comments on the draft PAB study entitled, *The Employment of Asian Americans and Pacific Islanders at GAO*. We are impressed with the overall efforts PAB has taken to improve workforce diversity and inclusiveness at GAO and appreciate the opportunity to provide comments. We noted several areas in the report that we feel warrant inclusion in the current draft.

- While the study acknowledges issues surrounding the perceptions of Asian Americans in the Federal government beginning on page 6, PAB did not address these issues in its conclusions or recommendations. We feel it is important to highlight that creating a work environment that fosters diversity and inclusiveness requires more than just having the numerical representation of certain groups. GAO has taken steps to change stereotypical perceptions in the workplace, but change does not occur overnight and sustained efforts are needed.
- Data outlined on pages 16 and 28 suggest that there is a concentration of Asian American employees within certain mission teams and in the field, and that these factors may affect promotions. However, PAB did not address these issues in its conclusions or recommendations. We feel it is important that the agency consider mission teams and geographic locations in reviewing promotion and representation data by band level.
- On page 32, PAB recommends that the agency or O&I survey its Band III population to determine their level of interest in the SES; their reasons, if any, or opting out of consideration; and whether they perceive barriers in the application process. In addition, we suggest that the agency interview the 4 Asian Americans who did apply for SES (mentioned on page 9) to better understand their experiences in the application and selection process.



Personnel
Appeals
Board

Office of General Counsel

MEMORANDUM

TO: BETH DON
EXECUTIVE DIRECTOR

FROM: STUART MELNICK
GENERAL COUNSEL *SM*

DATE: August 15, 2011

RE: Study of Asian Americans and Pacific Islanders

Thank you for the opportunity to review the study of Asian Americans and Pacific Islanders (AAPI) at GAO. The study was meticulous, enlightening, and very well written.

In terms of the findings, the report brought to light a problem with respect to promotions of AAPI employees. It is troubling that relatively few AAPI employees seek, or are given, promotions in GAO, and I was pleased to see that your recommendations reflected this concern. In terms of why this situation exists, especially in light of the fact that AAPI employees as a whole receive positive evaluations, it seems to me that GAO needs to address the problem of how

management is perceived by AAPI employees. Indeed, I found it troubling that there is a perception among AAPI women that GAO's culture is not tolerant of people who are different, and that some AAPI women reported difficult supervisors. See p. 10.

In addition, the study shined a light on the responses to two survey questions. First, a large majority of all employees, and 93 percent of AAPI employees, agreed with the statement: "Employees have to conform to the GAO way to get ahead in this organization." The response to this question raises the question of whether GAO employees believe they need to conduct themselves in a certain way, over and above what is expected of federal employees. I believe GAO should analyze this issue closely. That said, even more troubling was the overwhelming agreement by all GAO employees, and 91 percent of AAPI employees, with the statement that the reason for non-selection was that someone else was pre-selected. This issue also needs analysis by GAO management, and perhaps these perceptions deserve specific mention in the fourth recommendation in the report.

It was a pleasure reading the report, and I am grateful to all the effort and hard work that went into researching and drafting it. I think the mission of GAO will benefit from its findings.



G A O

Accountability • Integrity • Reliability

United States Government Accountability Office
Washington, DC 20548

August 26, 2011

Beth Don
Executive Director
Personnel Appeals Board
Washington, DC 20548

Dear Ms. Don:

We appreciate the opportunity to comment on a draft of the PAB's report, *The Employment of Asian Americans and Pacific Islanders at GAO*. As the report notes, the representation of Asian Americans and Pacific Islanders (AAPI) at GAO has grown considerably in the past two decades. It also points out that AAPI employees have higher average performance appraisal scores as compared to other demographic groups and AAPI applicants under 40 are selected for promotion at a rate higher than their representation rate in the GAO workforce. We also appreciate the recognition of our efforts to promote an inclusive work environment that is reflected in the PAB's survey results that AAPI employees were "overwhelmingly favorable on the questions that measure cultural and climate processes at agencies and organizations."

At the same time, we acknowledge the concerns regarding the lack of representation of AAPI employees at the agency's most senior levels, in the Senior Executive Service (SES) and Senior Level (SL) positions, but believe that GAO is heading in the right direction. AAPI representation has been growing at the SES/SL levels over the last several years—from 5.0 percent in 2008 to 6.6 percent in 2011—compared to overall representation rates of 7.2 percent to 8.0 percent over the same period.¹ Importantly, representation at the Band IIB and Band III analyst levels has also grown steadily—from 7.3 percent in 2008 to 8.7 percent in 2011 for Band IIB, and from 4.9 percent to 5.8 percent for Band III over the same period. This indicates continued development and progress of our AAPI staff in the largest pay plan at GAO and shows promise for continued growth at higher levels in the future. We do, however, recognize the importance of continuing to focus attention on increasing representation of minorities in leadership positions and thus continue to include this as an area of focus in our Workforce Diversity Plan.

¹ All data points are as of September 2008 and August 2011.

Regarding separations of Asian American females, we do not observe a discernible trend in separation rates that would indicate a cause for concern at this time. While as your report notes, AAPI females separated at rates higher than their representation in 2000, 2003, and 2008, separation rates across all demographic groups have similarly fluctuated across this period. Also, if separation and hire rates are compared, we are doing well and overall representation of Asian American females continues to grow. In only one year during the 10-year period did the separation rate of AAPI females exceed their non-intern hire rate. Specifically, in 2008, AAPI females accounted for 5.6 percent of all separations and 4.4 percent of all non-intern hires. However, for every other year during the period, the non-intern hire rate was higher than the separation rate and, in six of those years, the hire rate was two or more times higher. As a result, over the entire period the non-intern hire rate has exceeded the separation rate for AAPI females by several points (6.4 percent vs. 3.6 percent) and accordingly, representation of AAPI females has continued to increase from 2.6 percent in 2000 to 5.4 percent in 2010.² However, we do agree with the Board's recommendation, discussed below, to gather more specific information on the reasons employees leave GAO, which will help us determine if there are areas of concern causing employees or specific groups of employees to separate.

Regarding the Board's recommendations, we have a variety of actions either underway or planned that address several areas, and are considering actions in other areas.

Separation Information: We currently have a task team evaluating and modifying GAO's exit survey and one area of focus is to gather more specific information on the reasons why employees leave GAO. We hope to implement the revised survey in fall/winter 2011.

Upper Level Hiring: We hire at upper levels into GAO, as appropriate, based on our workforce plans (over the past 3 years, upper level hires have accounted for about 25 percent of all hiring).³ However, while we recognize this as a tool for augmenting our staff with a potentially diverse pool of candidates, when we have positions to fill at this level, they tend to require very specialized, technical skills, which can limit the candidate pool. Further, under the current constrained budget environment, we have already significantly curtailed hiring to only very critical positions—hiring in fiscal year 2011 is expected to be just 20 percent of what it was in the prior year—and expect this situation to continue into the future.

² There was a small decline of .1 percent between 2007 and 2008.

³ We consider upper level hires to be hires at the SES/SL level; the Band II level or above for our PE and PA pay plans; and the following bands within the APSS pay plan—PT Band II and above, MS I or II, and AC Band III or IV. We also hired 2 people at the GS 14/15 level during this period.

Participation in Career Development and Mentoring Programs: In our response to your request for information on career development programs for GAO employees, we identified a number of relevant programs. For our interns, entry-level hires, and newly-promoted employees, we have formal curricula and ensure that all employees in these groups participate in required career development activities. This includes having "buddies" for interns and advisors for staff in our professional development programs, in addition to attending required training. We plan to systematically collect demographic data on participation in GAO's mentoring program beginning in fiscal year 2012 to monitor the level of participation.

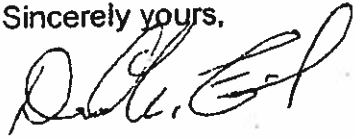
SES Application and Selection Processes: We do not believe a review of the application and selection processes for internal promotions into the SES will help determine why the AAPI population has not increased its participation at that level to be commensurate with its overall representation rate. These processes have been designed to be fair and impartial, and we have not heard of any concerns with the process in the discussions we have had with recent SES cohorts or in a one-time information sharing session on what the process entails, which was attended by 26 SES-eligible staff members. Instead, we believe our actions to enhance employee and manager understanding of cultural differences through diversity training and a continuing focus on inclusiveness are more appropriate to address the concern about a lack of participation at the SES level by minorities. We will continue to focus on sensitizing GAO staff and managers to these cultural differences and support opportunities for shared discussions. In one step, the AALG, working with Asian American SES, has initiated a new program, *Tea with Senior Managers*, to provide staff with valuable perspectives on navigating GAO's culture, including discussing how Asian cultural norms can be interpreted in the workplace.

Information Available on Promotions: GAO has done some work looking at the information available to staff about career advancement opportunities. As a first step, information on all the various pay plans and bands, along with salary ranges and the number of GAO staff in each position was posted on the Intranet [see Pay Plan Comparison]. Additional work has been postponed due to GAO's budget constraints. It is unclear whether we will be able to continue work in this area in fiscal year 2012.

Survey Band IIIs on SES Interest: At this time, GAO is not considering conducting a survey to identify the factors that influence whether or not employees are interested in pursuing senior leadership positions, but will discuss this issue as we begin workforce planning in the fall. Based on anecdotal evidence, the reasons for the lack of interest in pursuing the SES at GAO appear similar to the reasons noted in the recent federal government-wide survey you reference in your report. However, we recognize that it is critically important to expand interest in the SES. Therefore, the Executive Committee and the Executive Resources Board will discuss with GAO's senior leadership ways to excite and engage our Band IIIs and other eligible staff in considering the SES as we begin workforce planning for fiscal years 2012 and 2013.

We have provided technical clarifications and editorial comments and suggestions for your consideration in a separate document. Again, we appreciate the opportunity to comment on this draft report and would be pleased to discuss any of these issues in more detail with you, at your convenience. Should you have any questions, please contact Trish McClure at 512-6318.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. M. Fisher", written in a cursive style.

David M. Fisher
Chief Administrative Officer

Enclosure

Appendix III: Asian American Pacific Islanders Survey and Results

Personnel Appeals Board - Diversity Climate Survey

9/7/10 – 9/24/10

This survey should be completed by U.S. Government Accountability Office (GAO) personnel only. The survey can be completed using any computer with web access, as long as pop-up blockers are disabled (e.g., home computers). Please read each item carefully and answer in a frank and honest manner. Most people complete the survey in less than 10 minutes. Your responses to this survey are anonymous and will be combined with others in your organization to create summary reports.

If you have questions about the survey itself, please contact Gail Gerebenics at GerebenicsM@gao.gov. If you experience technical difficulties while taking the survey, please contact Melissa Buford of the US Office of Personnel Management at Melissa.Buford@opm.gov.

1. Promotions in my work unit are based on merit.
 - ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know
2. Pay raises depend on how well employees perform their jobs.
 - ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know
3. My supervisor is fair in recognizing good performance.
 - ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know
4. Supervisors/team-leaders in my organization are committed to a workforce representative of all segments of society.
 - ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know

5. My supervisor listens to what I have to say.
- ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know
6. I am satisfied with my involvement in decisions that affect my work.
- ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know
7. Managers/supervisors/team leaders work well with employees of different backgrounds.
- ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know
8. To what extent is prejudice, discrimination and/or harassment a problem in your organization?
- ☐ To no extent
 - ☐ To a minor extent
 - ☐ To a moderate extent
 - ☐ To a great extent
 - ☐ To a very great extent
 - ☐ Do Not Know
9. Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring).
- ☐ Strongly Disagree
 - ☐ Disagree
 - ☐ Neutral
 - ☐ Agree
 - ☐ Strongly Agree
 - ☐ Do Not Know

10. Employees in my work unit share job knowledge with each other.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

11. Training and career development opportunities are allocated fairly.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

12. The people I work with cooperate to get the job done.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

13. My performance appraisal is a fair reflection of my performance.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

14. My performance appraisal is a fair reflection of my performance.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

15. Complaints, disputes or grievances are resolved fairly in my work unit.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

16. My organization's leaders maintain high standards of honesty and integrity.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

17. I receive the training I need to perform my job.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

18. My supervisor provides me with opportunities to demonstrate my leadership skills.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

19. My work gives me a feeling of personal accomplishment.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

20. When needed I am willing to put in the extra effort to get a job done.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

21. Employees have to conform to the "GAO way" to get ahead in this organization.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

22. I know what it takes to move up in the organization.

- ☐ Strongly Disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly Agree
- ☐ Do Not Know

23. Considering everything, how satisfied are you with your job?

- ☐ Very Dissatisfied
- ☐ Dissatisfied
- ☐ Neutral
- ☐ Satisfied
- ☐ Very Satisfied

24. What is your major field of study? (Open ended, text box)

25. Upon completion of the PDP program, was your placement preference honored?

- ☐ Yes
- ☐ No

26. Have you had an opportunity to serve as an AIC?

- ☐ Yes
- ☐ No
- ☐ Do Not Know

27. If you have served as an AIC, how many engagements have you led?

- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5 or more

28. If you have served as an AIC, how many engagements were designated high risk?

- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5 or more

29. If there were a critical/high risk project in your team/unit/office, how likely is it that it would be assigned to you?

- ☐ Very Unlikely
- ☐ Unlikely
- ☐ Neither Likely nor Unlikely
- ☐ Likely
- ☐ Very Likely
- ☐ Do Not Know

30. In the last five years, have you applied for promotion and not been selected?

- ☐ Yes
- ☐ No

How important do you believe the following factors were in your nonselection?

31. Another candidate was better qualified.

- ☐ Not at all Important
- ☐ Unimportant
- ☐ Neither Important nor Unimportant
- ☐ Important
- ☐ Very Important
- ☐ Do Not Know

32. Someone else was "preselected".

- ☐ Not at all Important
- ☐ Unimportant
- ☐ Neither Important nor Unimportant
- ☐ Important
- ☐ Very Important
- ☐ Do Not Know

33. The selecting official did not like me.

- ☐ Not at all Important
- ☐ Unimportant
- ☐ Neither Important nor Unimportant
- ☐ Important
- ☐ Very Important
- ☐ Do Not Know

34. My past performance.

- ☐ Not at all Important
- ☐ Unimportant
- ☐ Neither Important nor Unimportant
- ☐ Important
- ☐ Very Important
- ☐ Do Not Know

35. My past conduct.

- ☐ Not at all Important
- ☐ Unimportant
- ☐ Neither Important nor Unimportant
- ☐ Important
- ☐ Very Important
- ☐ Do Not Know

36. My personal characteristics (e.g., race, ethnicity, gender, age, disability).

- ☐ Not at all Important
- ☐ Unimportant
- ☐ Neither Important nor Unimportant
- ☐ Important
- ☐ Very Important
- ☐ Do Not Know

37. How likely is it that you will apply for a higher level position within the next 5 years?

- ☐ Very Unlikely
- ☐ Unlikely
- ☐ Neither Likely nor Unlikely
- ☐ Likely
- ☐ Very Likely
- ☐ Do Not Know

38. If you are unlikely to apply for a higher level position, what are your reasons? (Mark all that apply)

- ☐ I would not enjoy the kind of work I would be doing
- ☐ I do not want the added responsibility
- ☐ I do not want supervisory responsibilities
- ☐ I do not want to work more hours
- ☐ A higher level position would interfere with my family responsibilities
- ☐ I do not think I have the qualifications/ability
- ☐ Other

39. How likely is it that you will apply for appointment to the SES or the Executive Candidate Assessment and Development Program?

- ☐ Very Unlikely
- ☐ Unlikely
- ☐ Neither Likely nor Unlikely
- ☐ Likely
- ☐ Very Likely
- ☐ Do Not Know

40. If you are unlikely to apply for appointment to the SES or ECADP, what are your reasons? (Mark all that apply)

- ☐ I would not enjoy the kind of work I would be doing
- ☐ I do not want the added responsibility
- ☐ I do not want supervisory responsibilities
- ☐ I do not want to work more hours
- ☐ A higher level position would interfere with my family responsibilities
- ☐ I do not think I have the qualifications/ability
- ☐ Other

The items in this section ask for your background and employment information. Responses will NOT be used to identify you as an individual. Results will only be available for groups of 10 or more respondents.

41. What is your pay band?

- ☐ Band I
- ☐ Band II-A
- ☐ Band II-B
- ☐ Band III
- ☐ APSS-AC
- ☐ APSS-PT
- ☐ APSS-MS
- ☐ SES
- ☐ Other

42. How long have you worked at GAO?

- ☐ Less than 6 months
- ☐ 6 months to less than 1 year
- ☐ 1 - 3 years
- ☐ 4 - 5 years
- ☐ 6 - 10 years
- ☐ 11 - 15 years
- ☐ 16 - 20 years
- ☐ 21 - 25 years
- ☐ 26 - 30 years
- ☐ 31 years or more

43. What is your level of supervisory responsibility?

- ☐ None
- ☐ First-line supervisor
- ☐ Manager
- ☐ Executive

44. What is your age?

- ☐ Less than 20
- ☐ 20 - 29
- ☐ 30 - 39
- ☐ 40 - 49
- ☐ 50 - 59
- ☐ 60 or over

45. Are you male or female?

- ☐ Female
- ☐ Male

46. What is your race/ethnicity? (Select one or more) (Mark all that apply)

- ☐ White
- ☐ Hispanic or Latino
- ☐ Black/African American
- ☐ American Indian/Alaska Native
- ☐ Asian
- ☐ Native Hawaiian/Other Pacific Islander
- ☐ Other



Performance America
U.S. Office of Personnel Management



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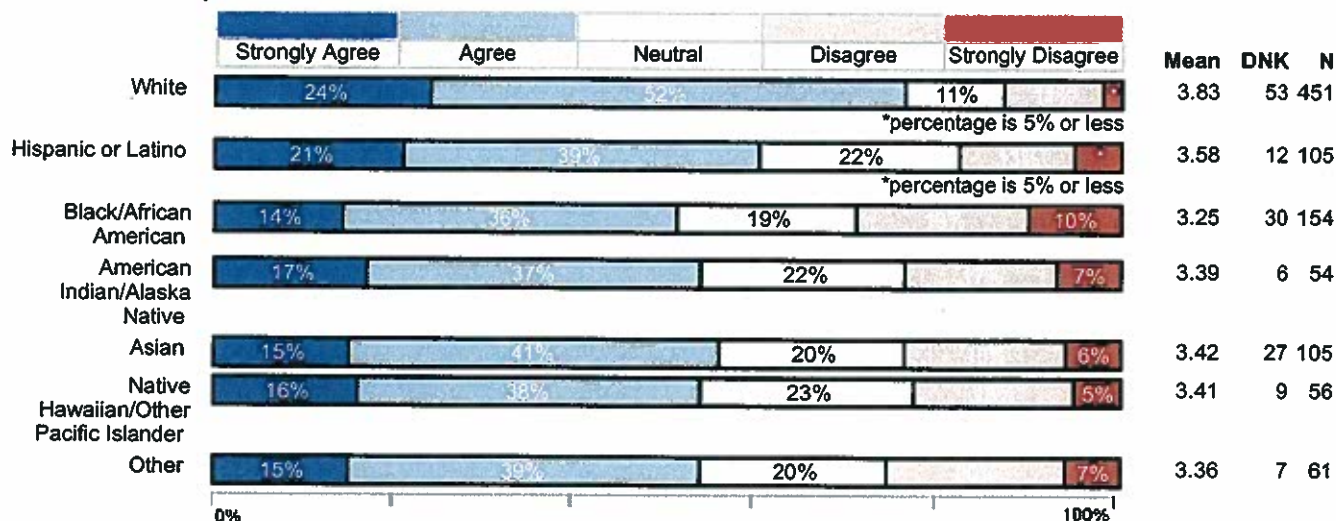
Report Menu

Survey: [PAB Diversity Climate Survey 2010](#)
Agency: Government Accountability Office

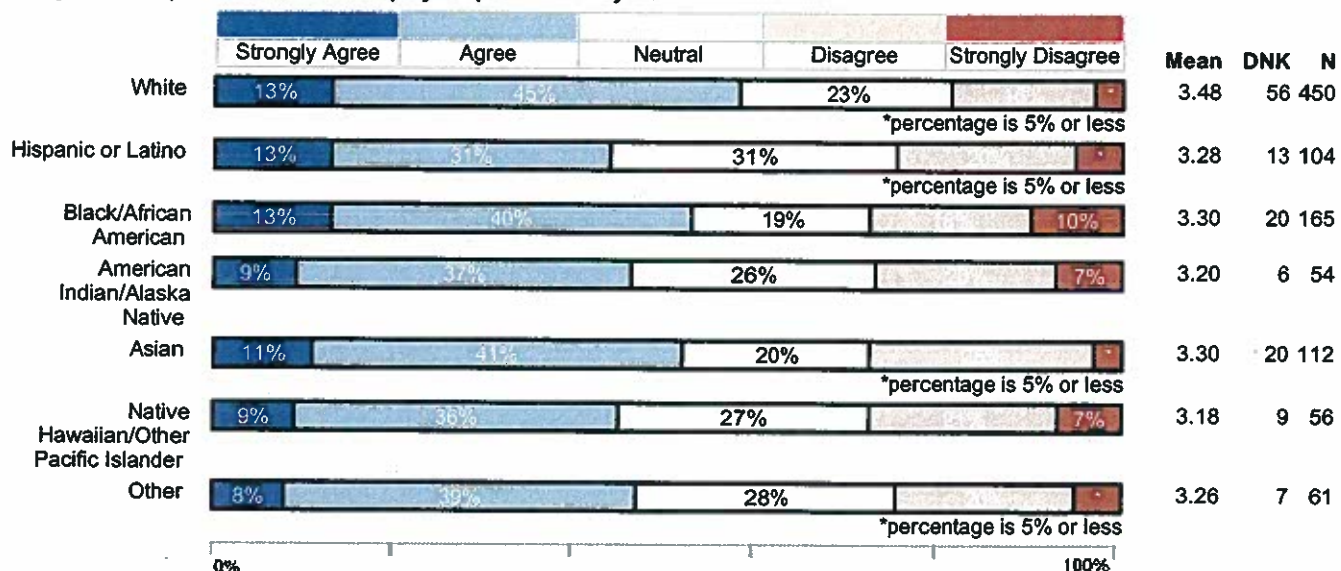
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Items
by
What is your race/ethnicity? (Select one or more)

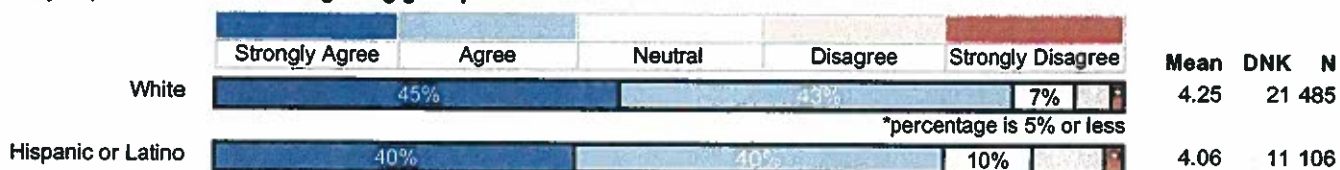
1. Promotions in my work unit are based on merit.

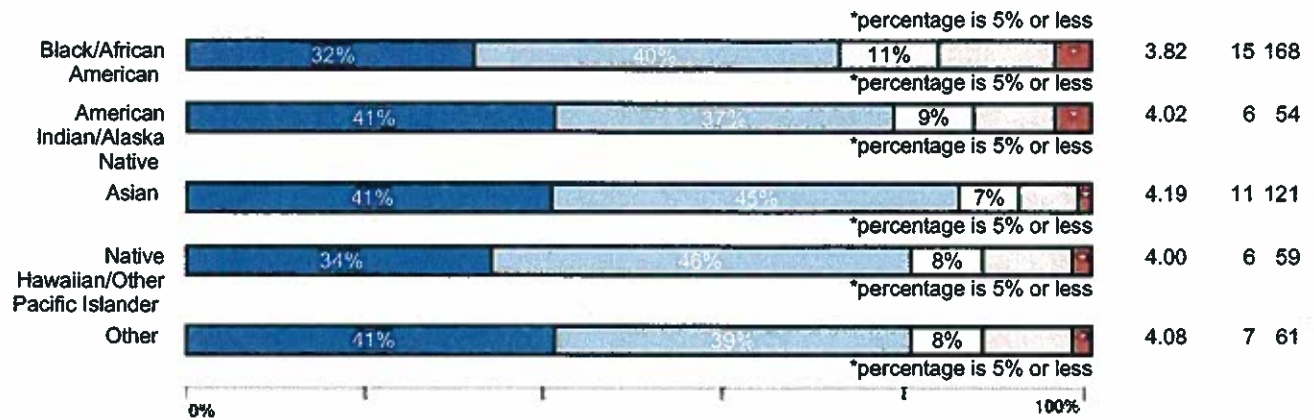


2. Pay raises depend on how well employees perform their jobs.

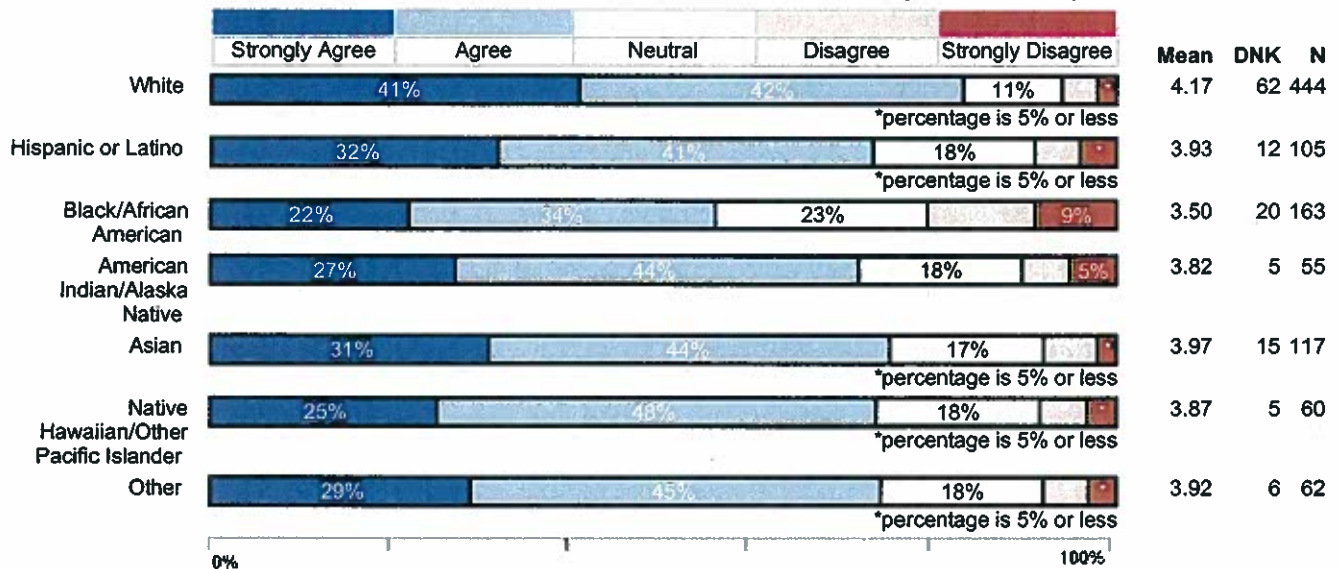


3. My supervisor is fair in recognizing good performance.

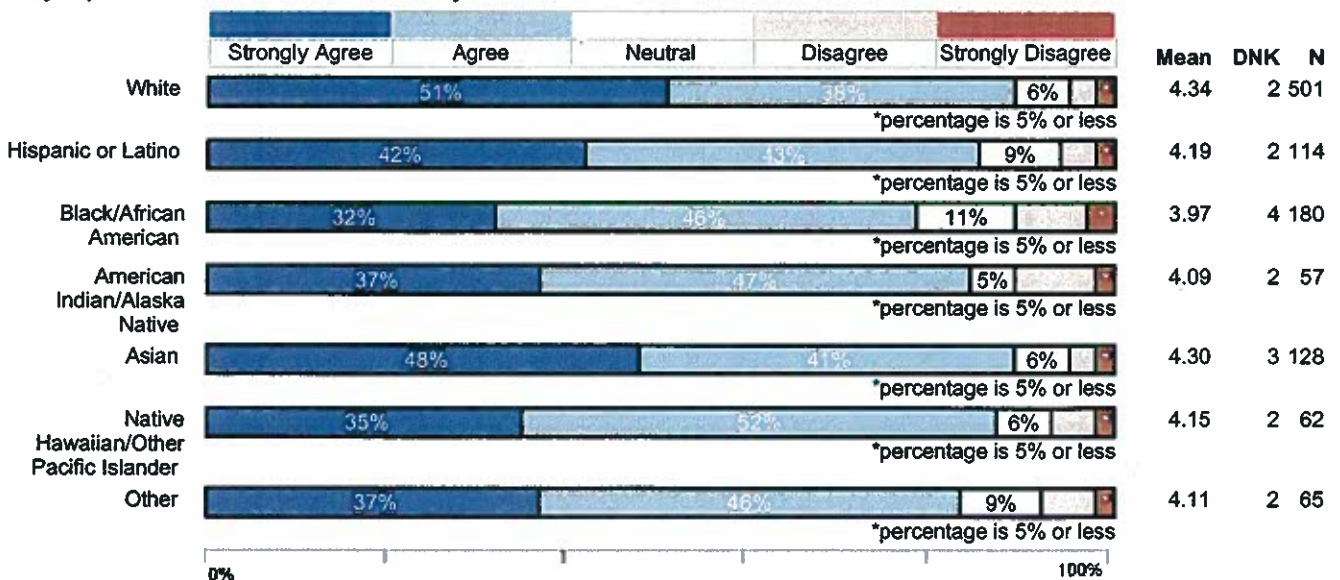




4. Supervisors in my organization are committed to a workforce representative of all segments of society.

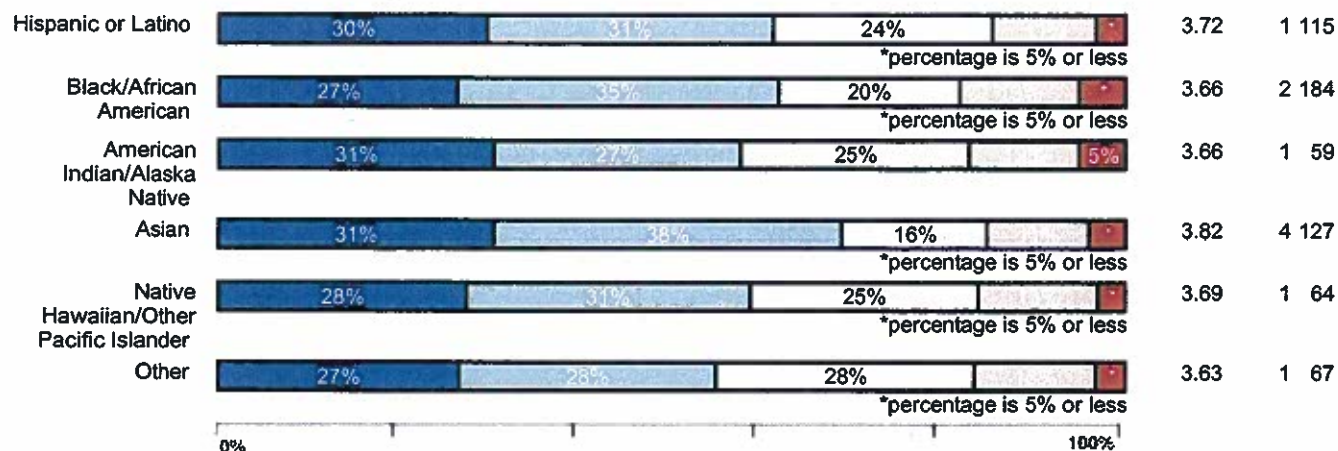


5. My supervisor listens to what I have to say.

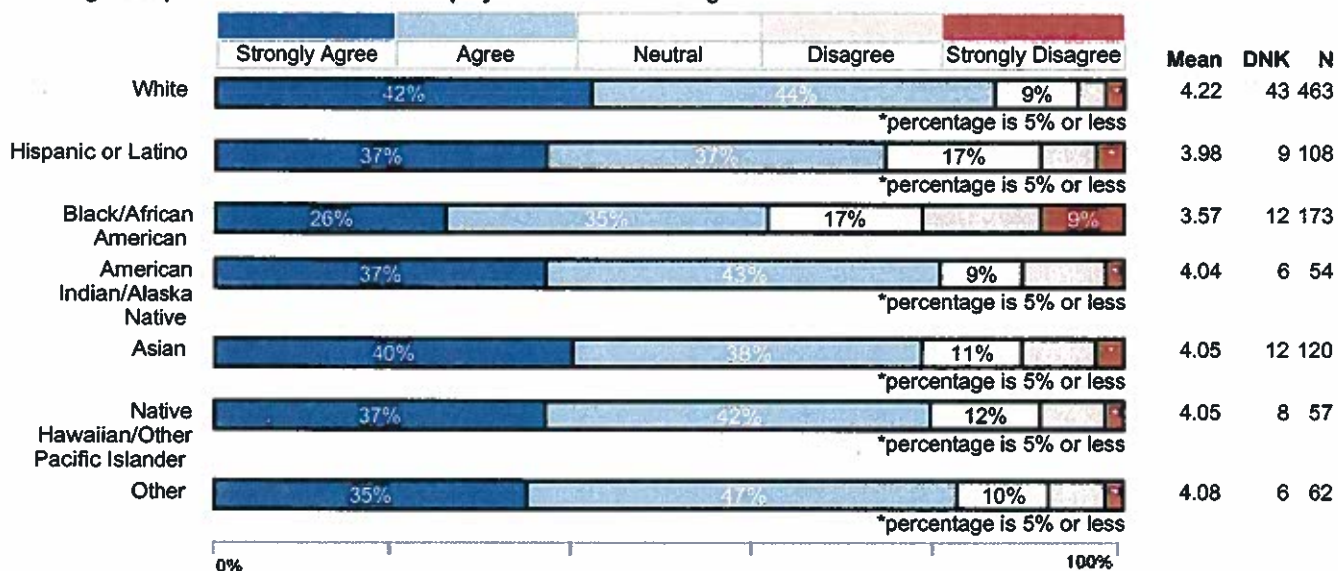


6. I am satisfied with my involvement in decisions that affect my work.

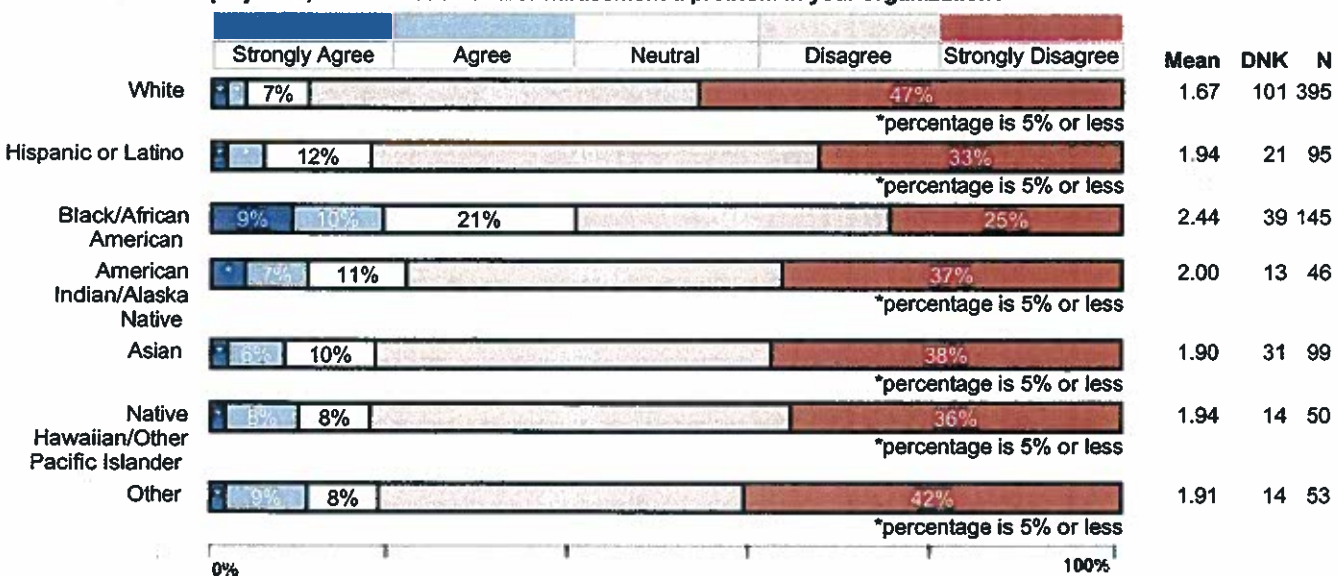




7. Managers/supervisors work well with employees of different backgrounds.

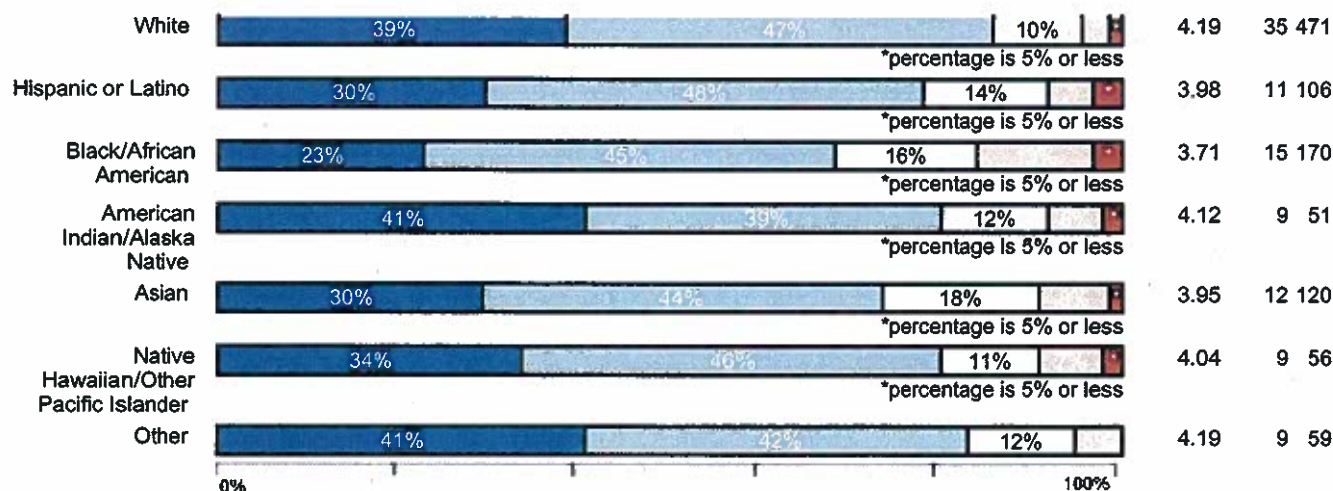


8. To what extent is prejudice, discrimination and/or harassment a problem in your organization?

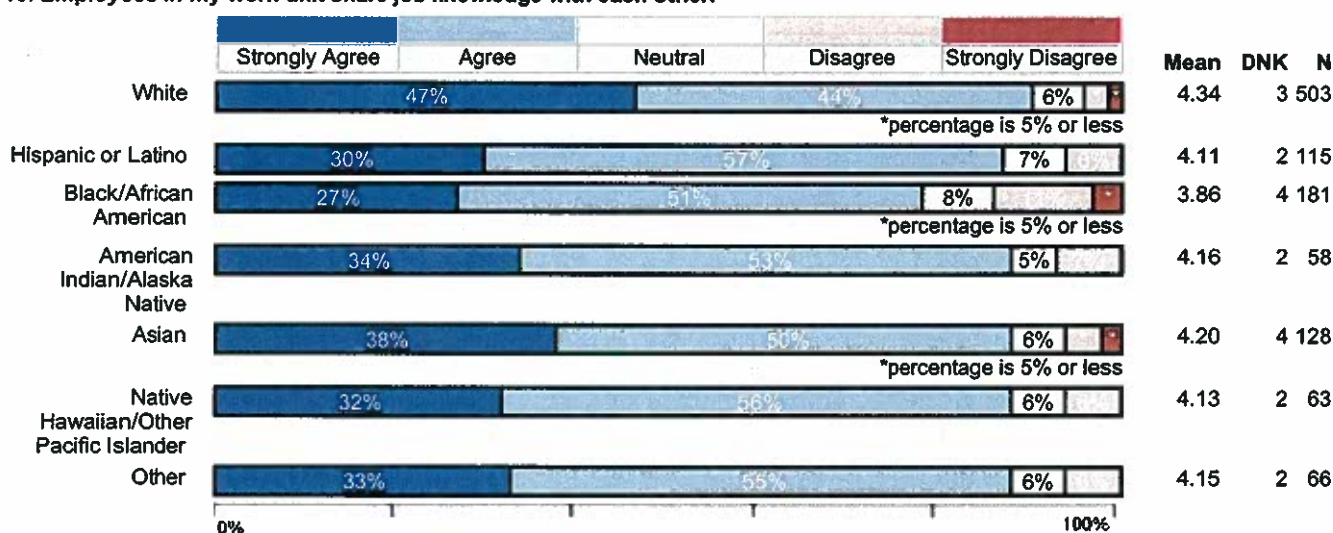


9. Policies and programs promote diversity in the workplace (for example, recruiting minorities and women, training in awareness of diversity issues, mentoring).

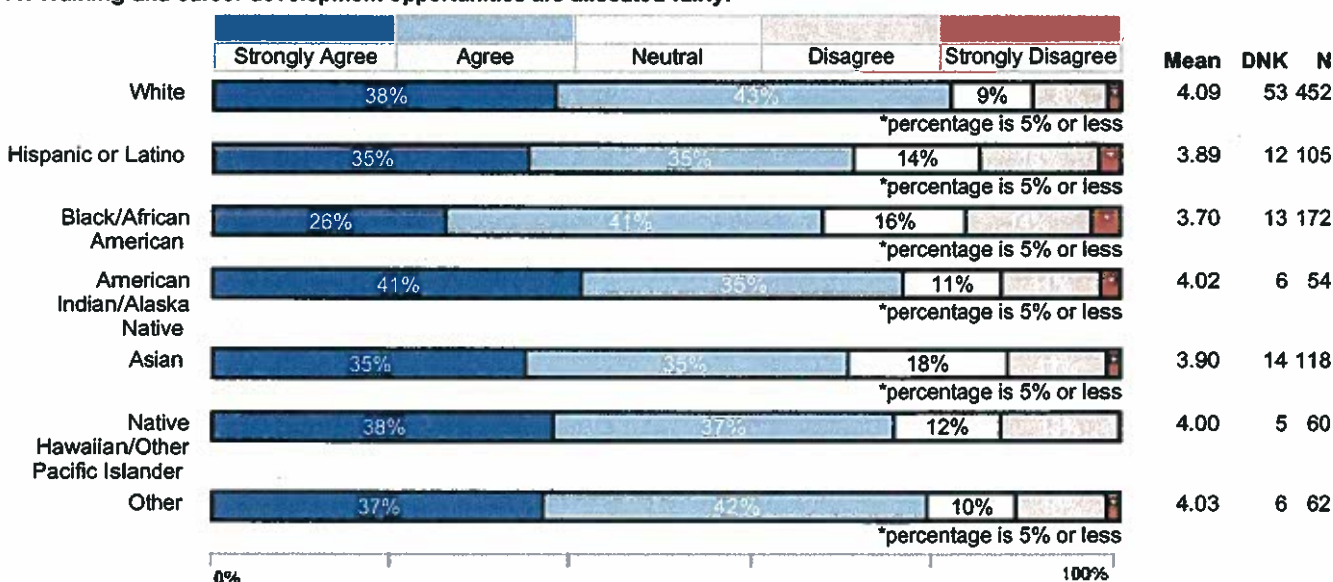




10. Employees in my work unit share job knowledge with each other.

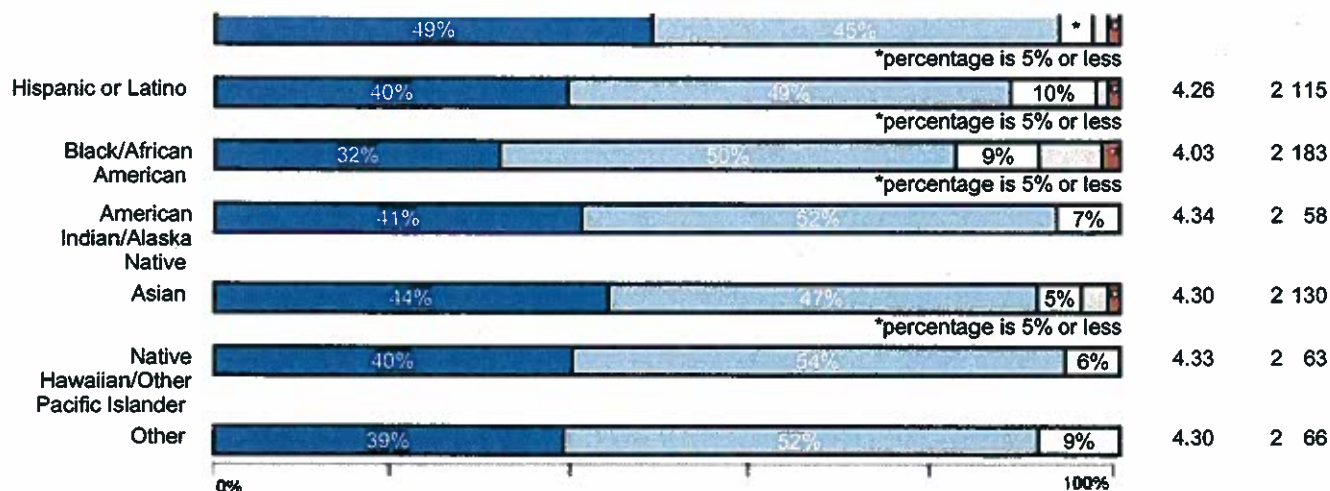


11. Training and career development opportunities are allocated fairly.

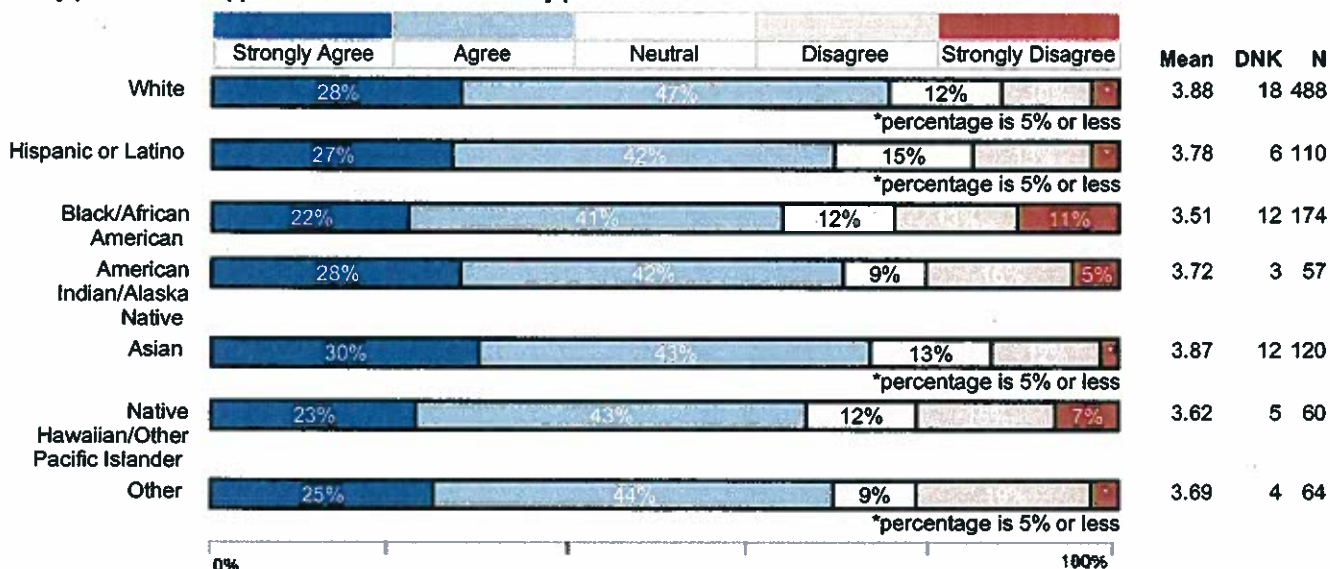


12. The people I work with cooperate to get the job done.

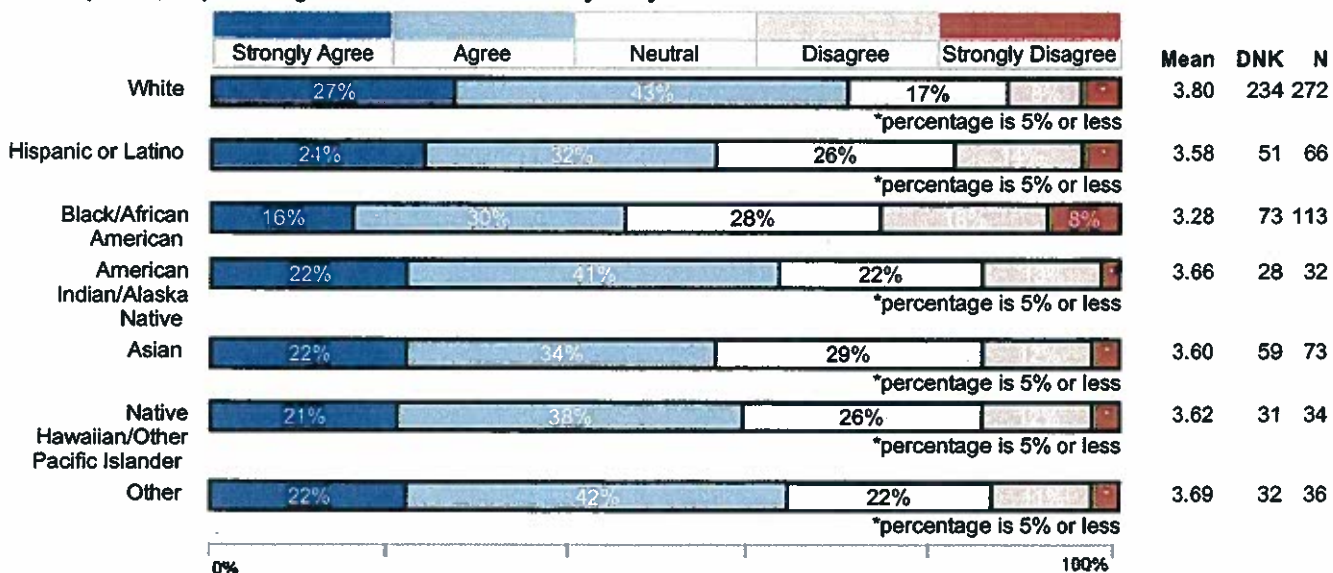




13. My performance appraisal is a fair reflection of my performance.

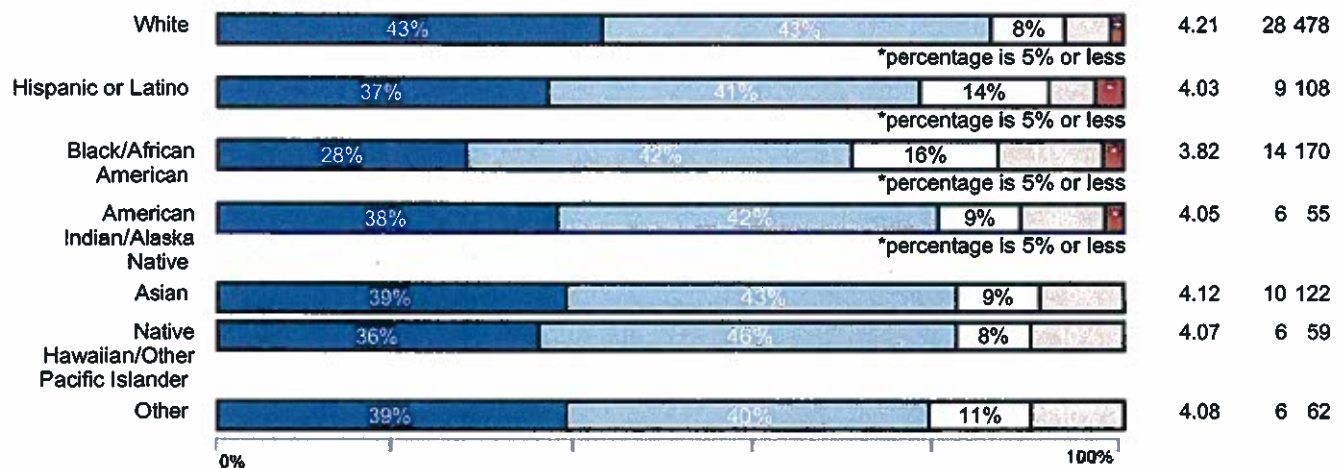


14. Complaints, disputes or grievances are resolved fairly in my work unit.

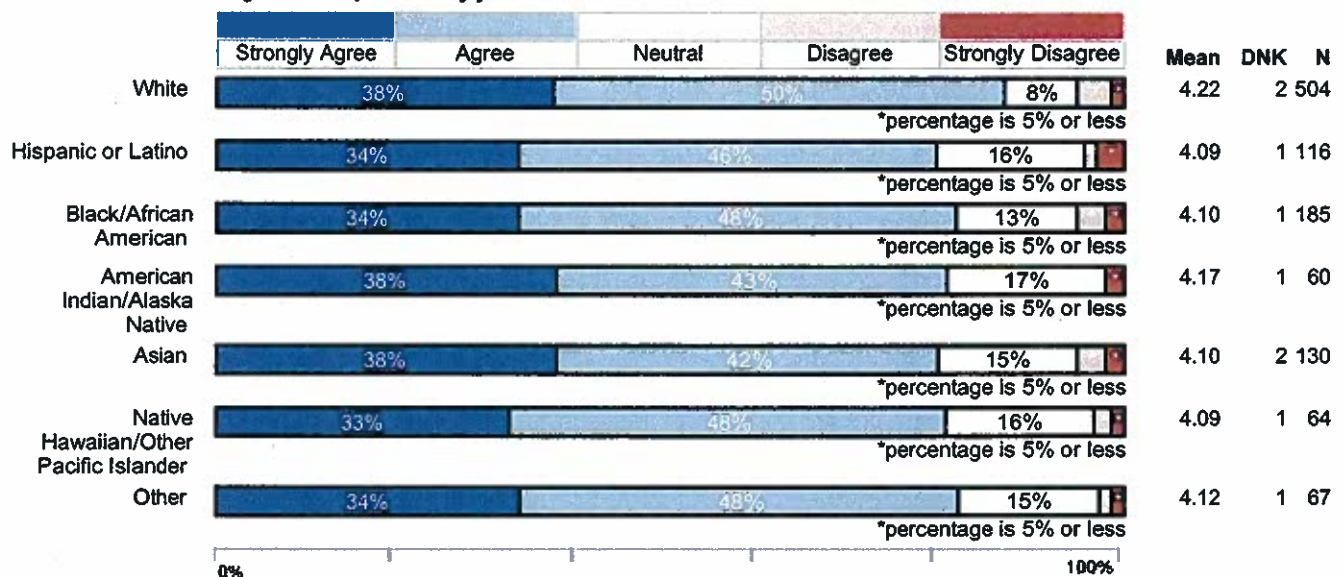


15. My organization's leaders maintain high standards of honesty and integrity.

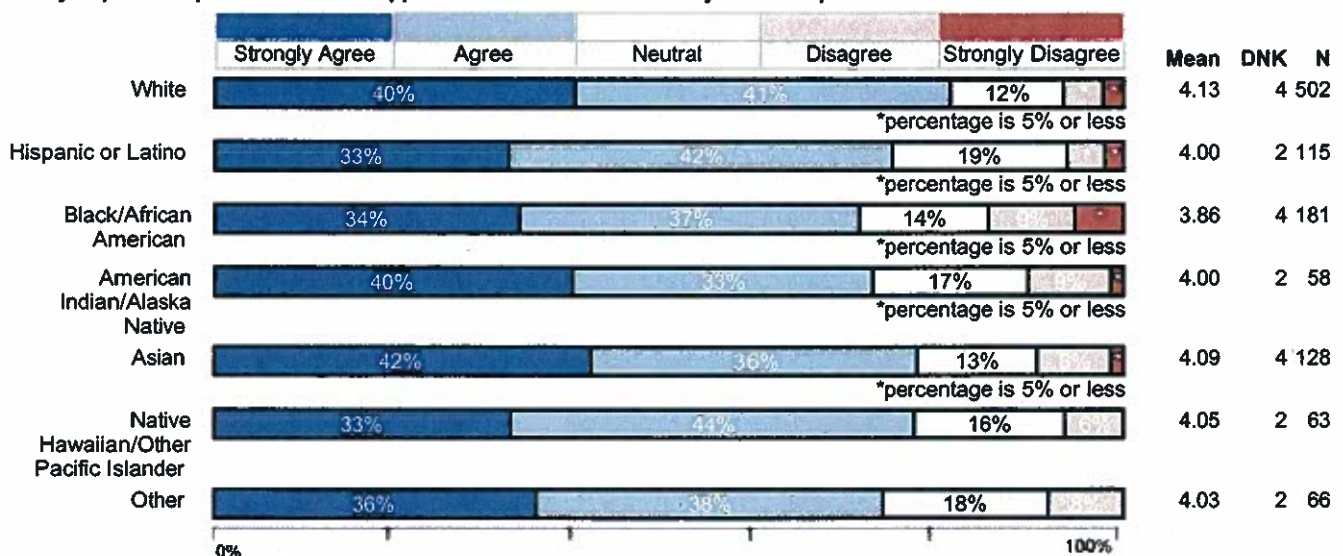




16. I receive the training I need to perform my job.

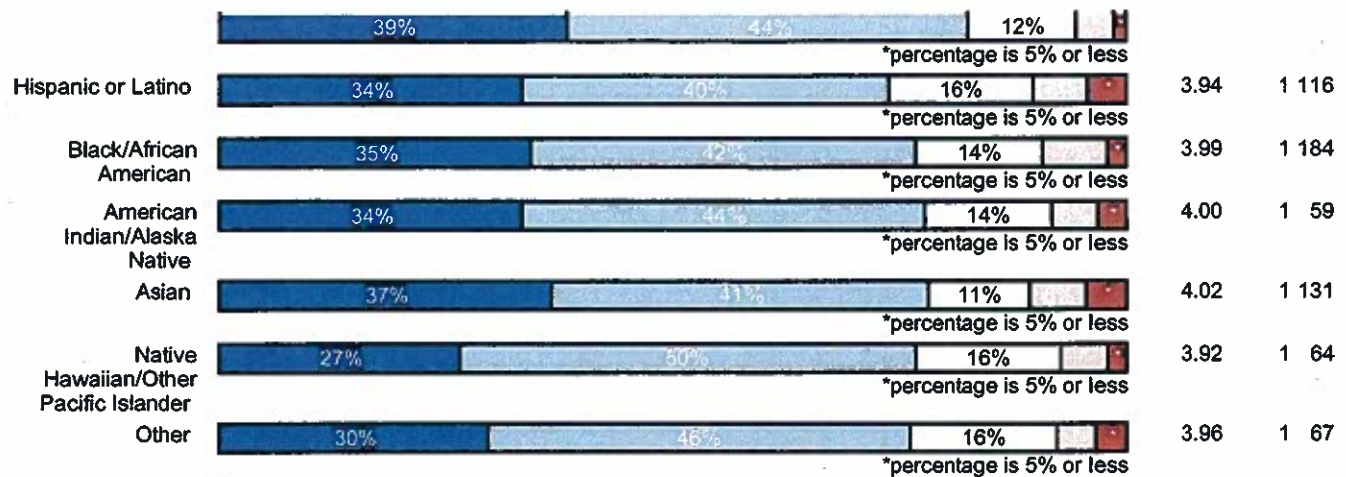


17. My supervisor provides me with opportunities to demonstrate my leadership skills.

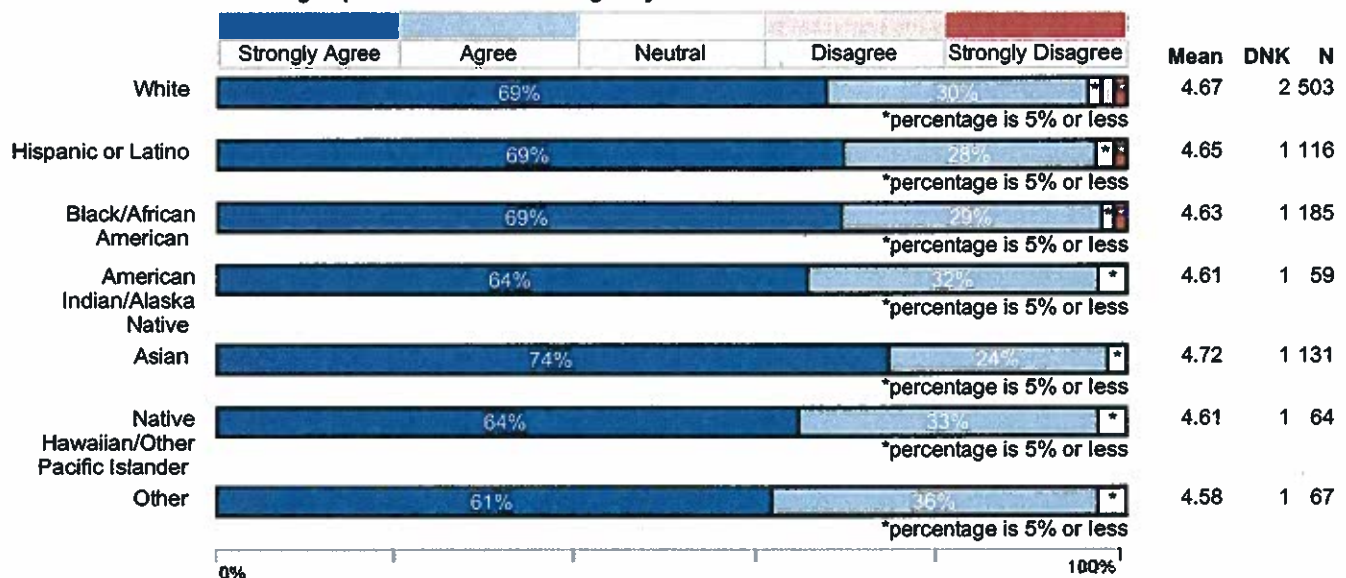


18. My work gives me a feeling of personal accomplishment.

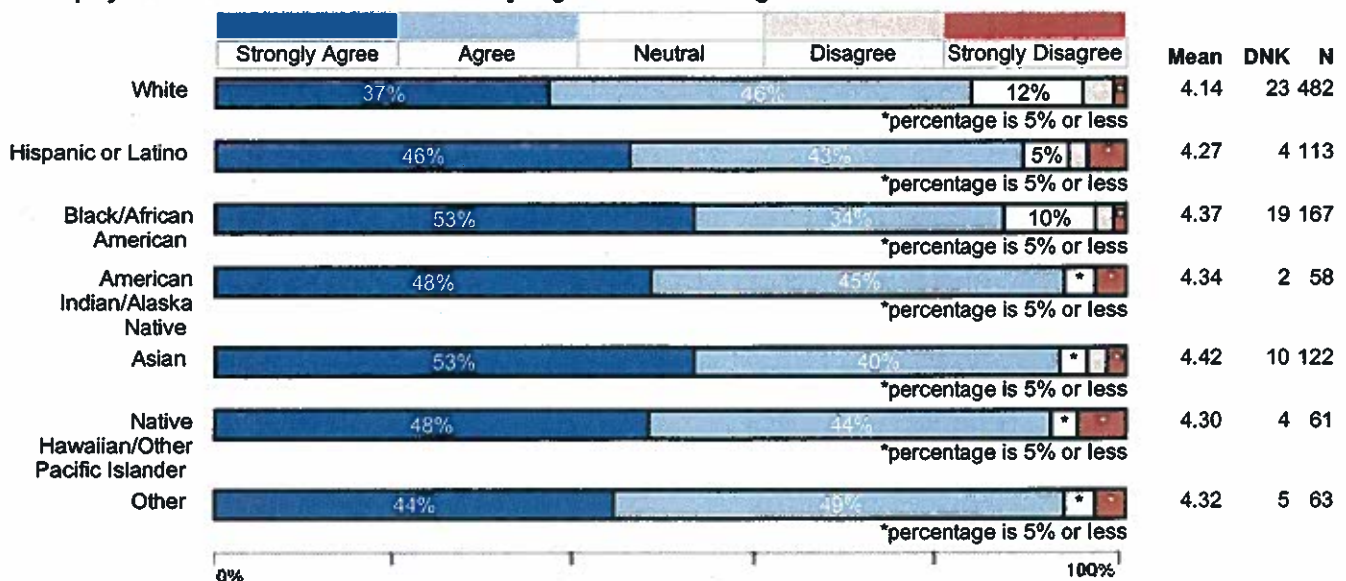




19. When needed I am willing to put in the extra effort to get a job done.

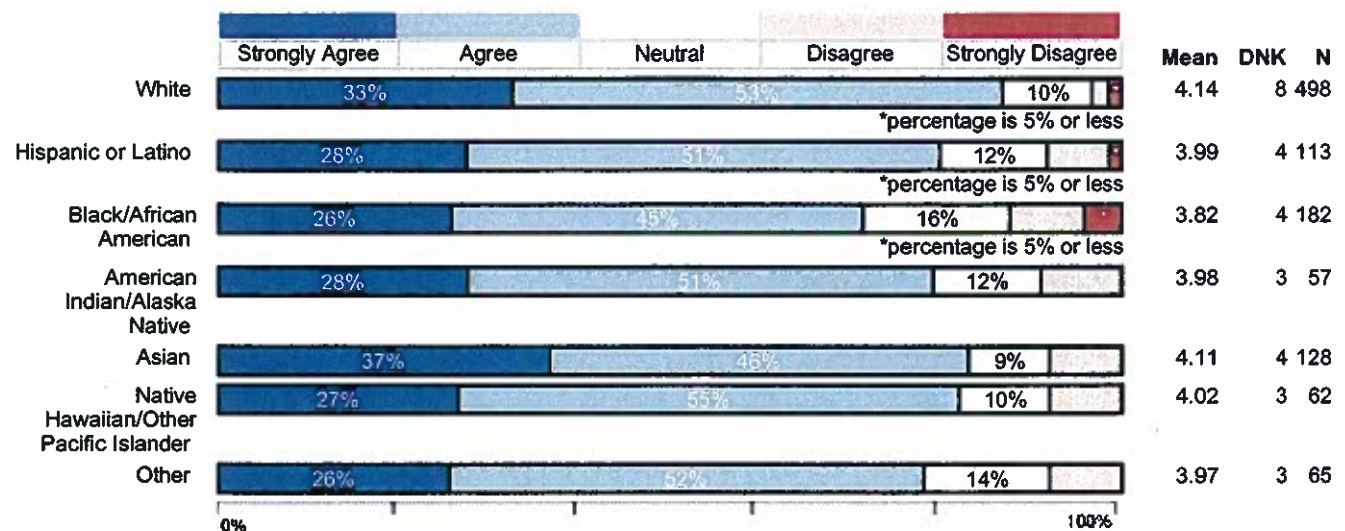


20. Employees have to conform to the "GAO" way to get ahead in this organization.

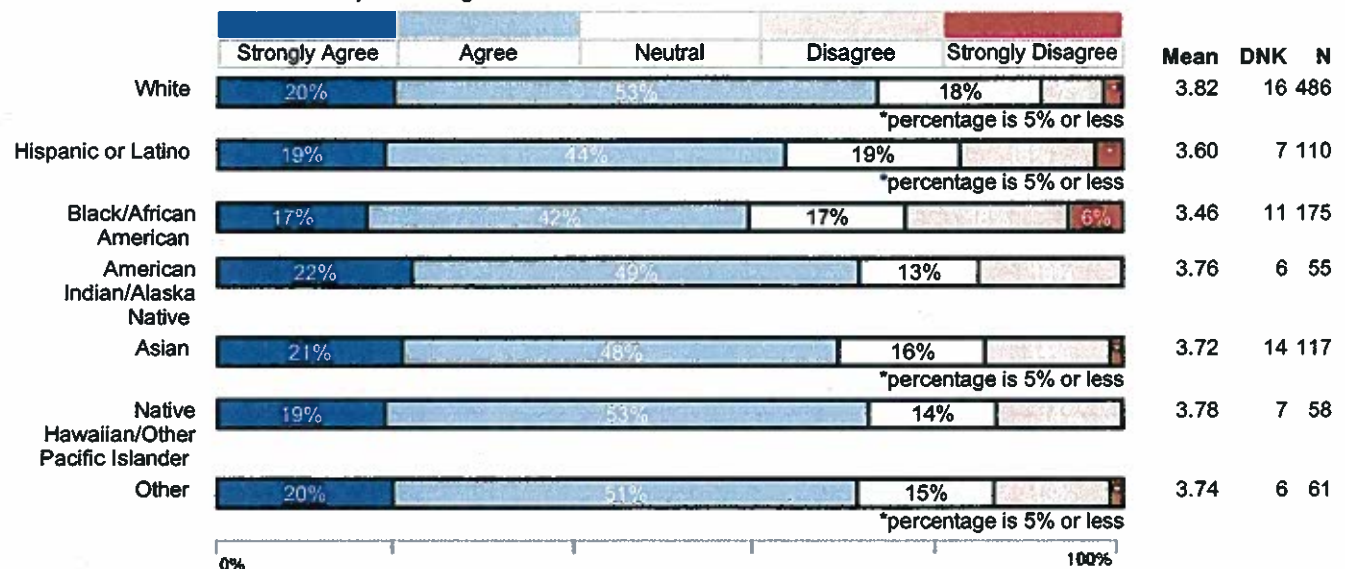


21. My supervisor gives me critical information needed to do my job.

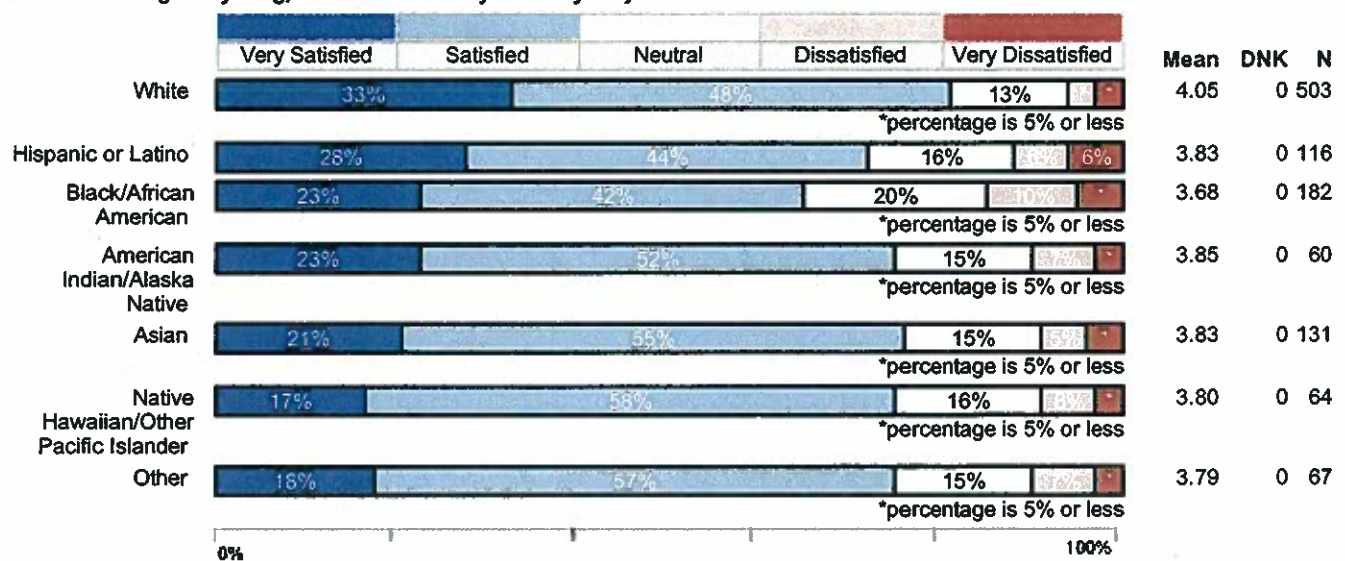




22. I know what it takes to move up in the organization.

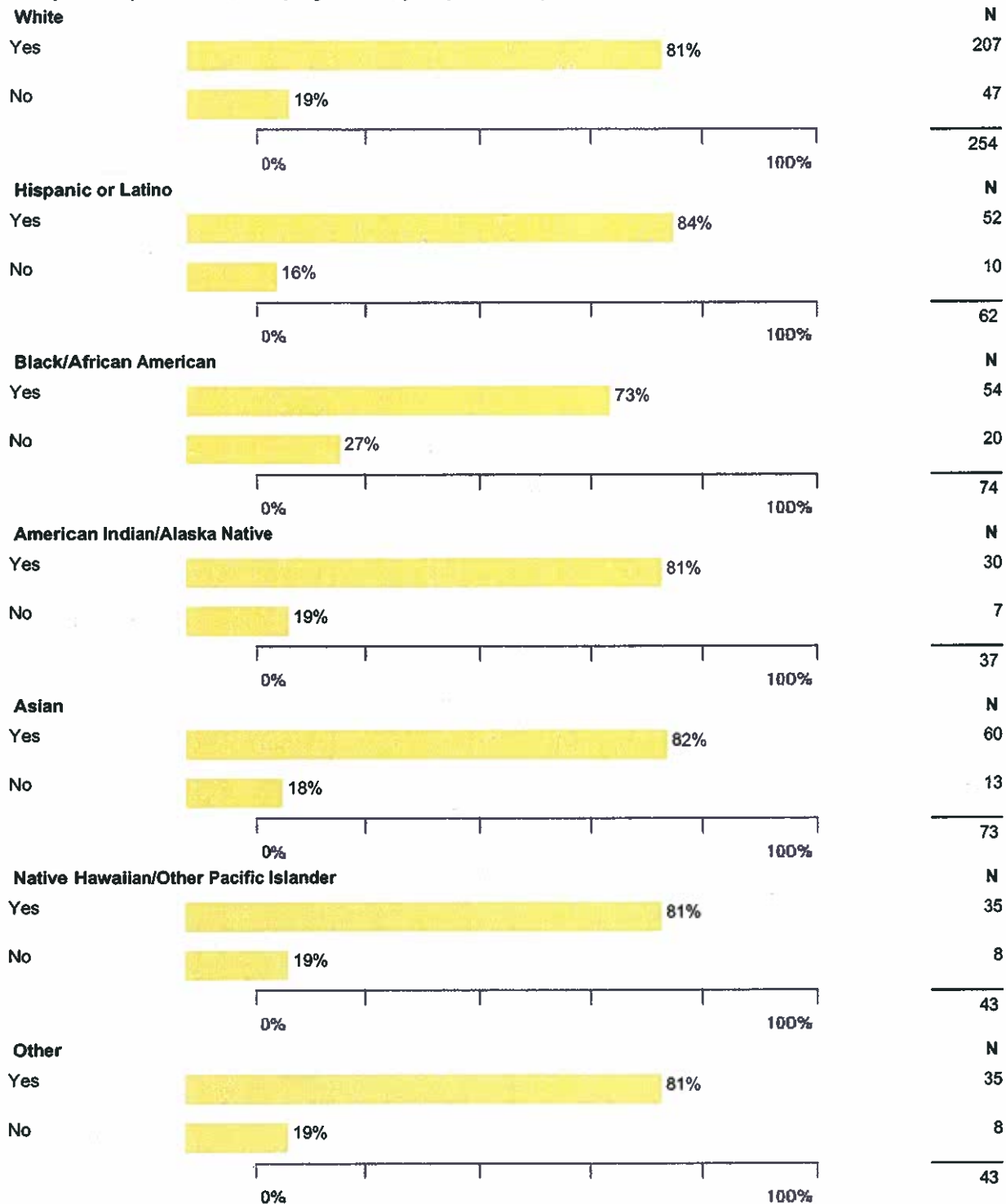
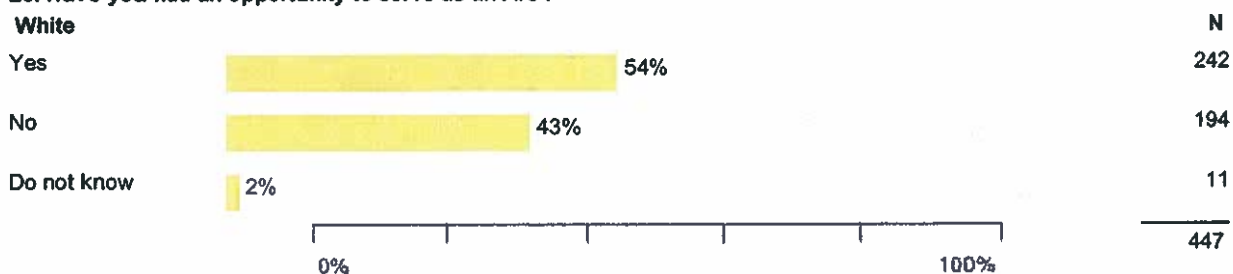


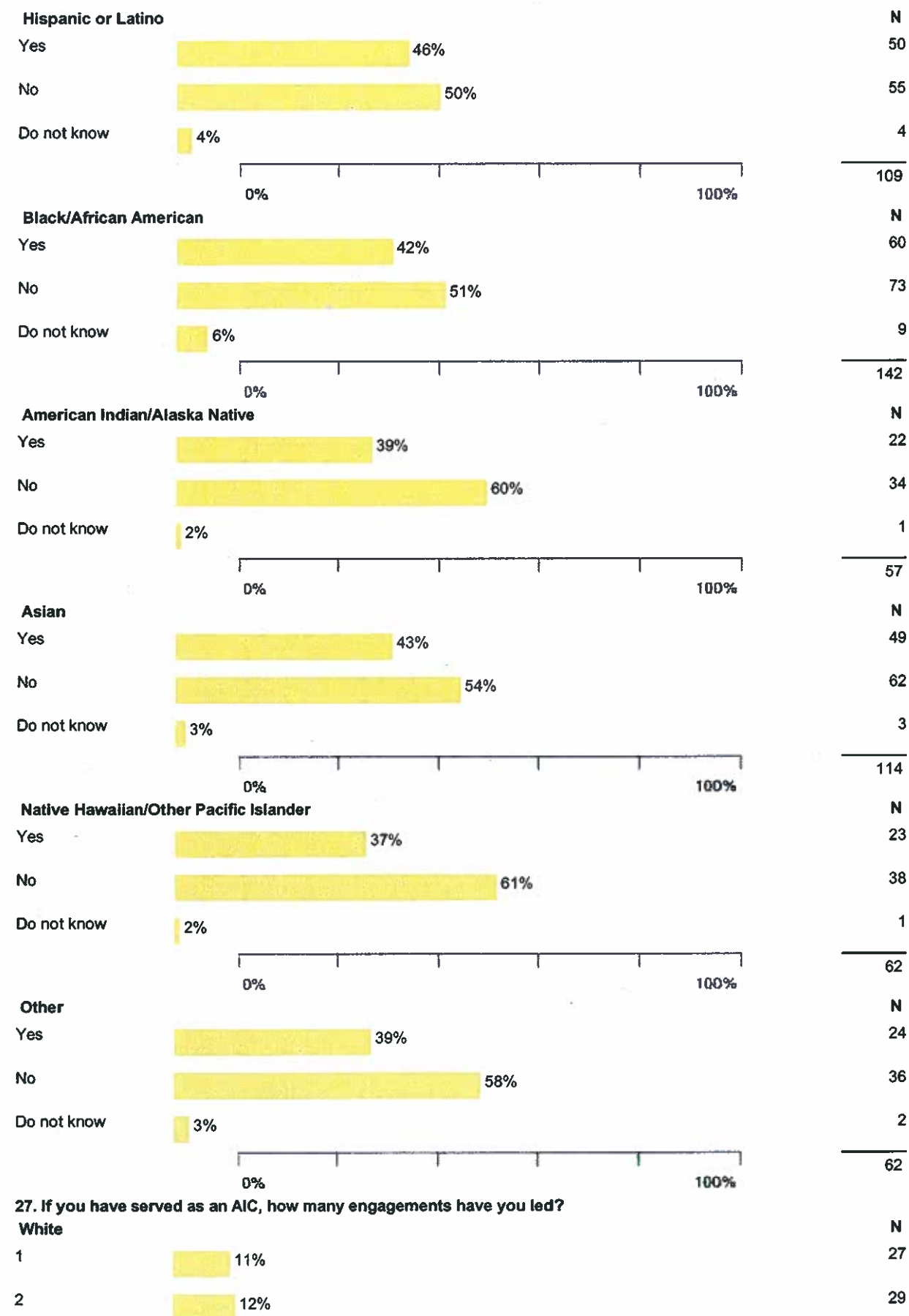
23. Considering everything, how satisfied are you with your job?

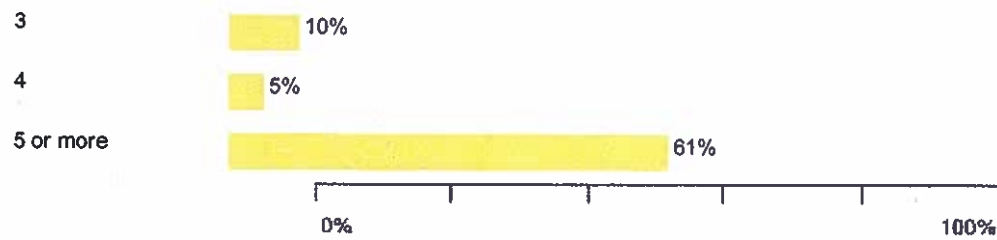


24. What is your major field of study?

– This item asked for text responses and its results cannot be shown here –

25. Upon completion of the PDP program, was your placement preference honored?**26. Have you had an opportunity to serve as an AIC?**



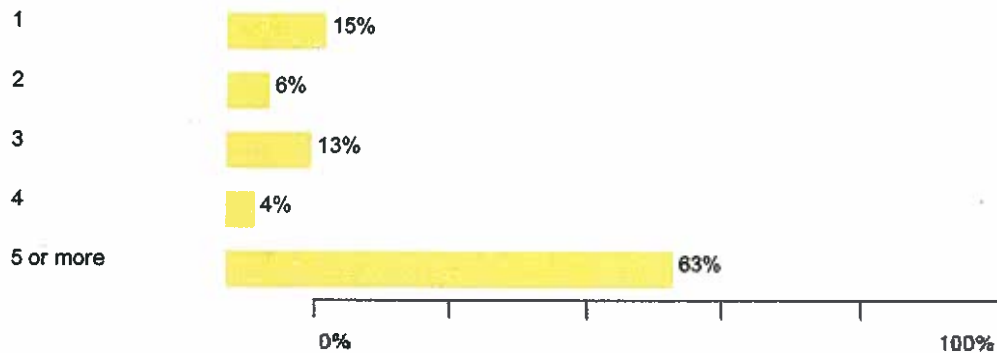


25

12

147

240

Hispanic or Latino**N**

7

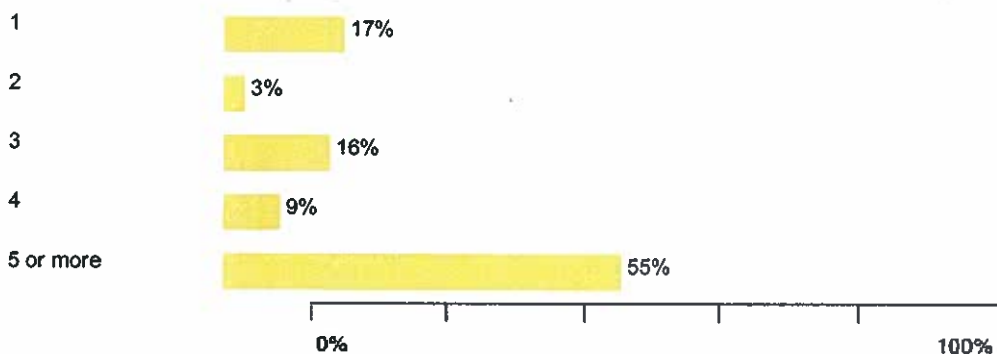
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6

2

30

48

Black/African American**N**

10

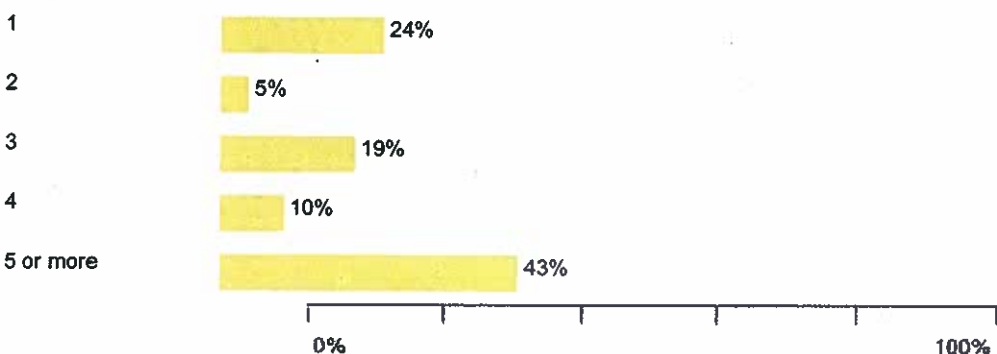
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32

58

American Indian/Alaska Native**N**

5

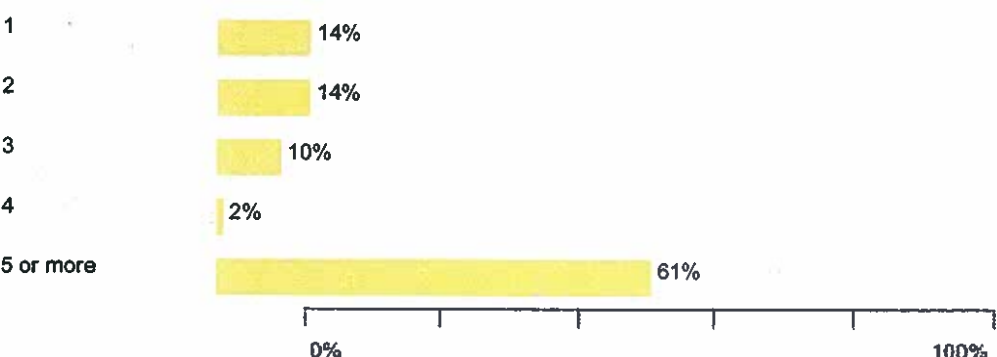
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Asian**N**

7

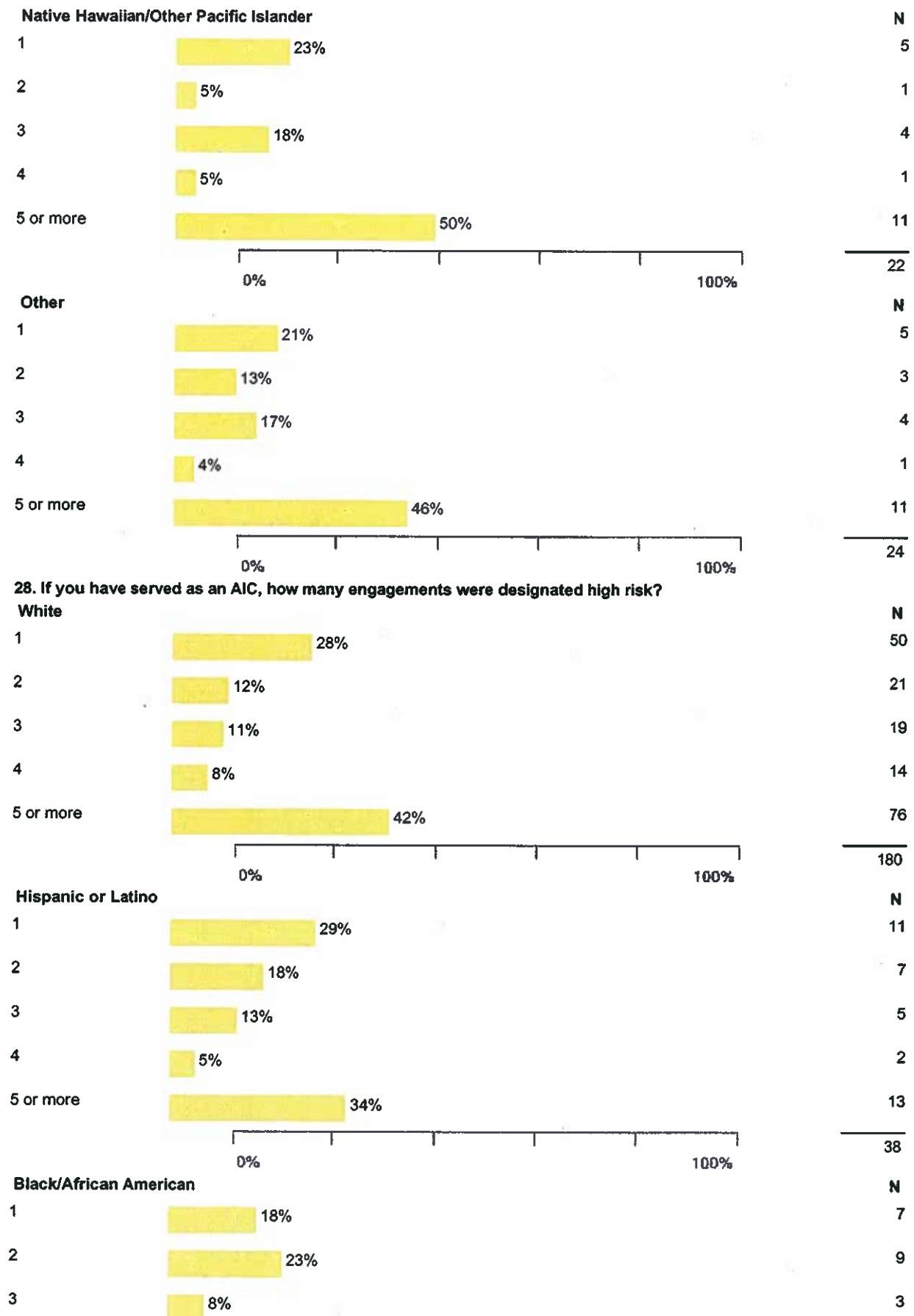
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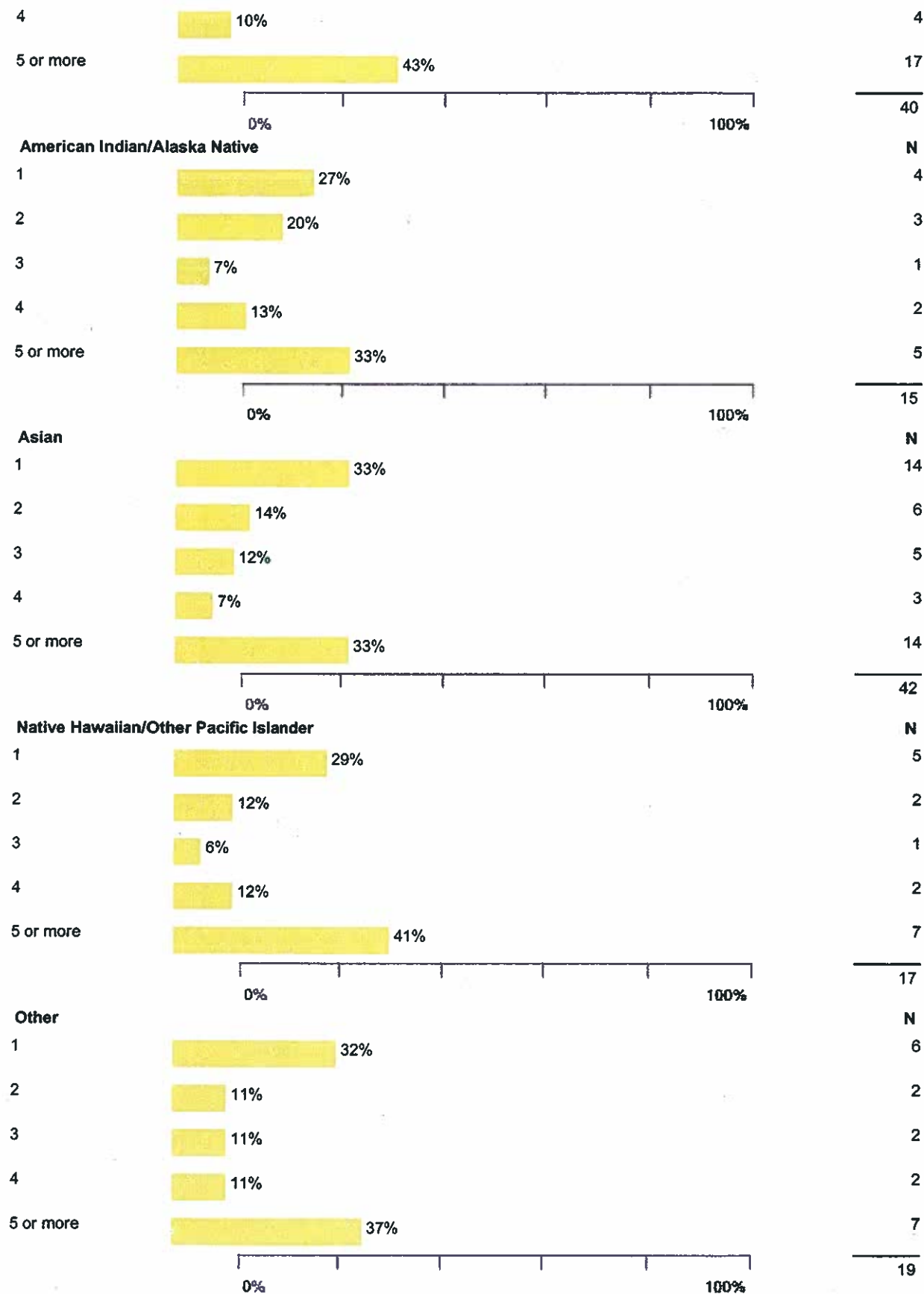
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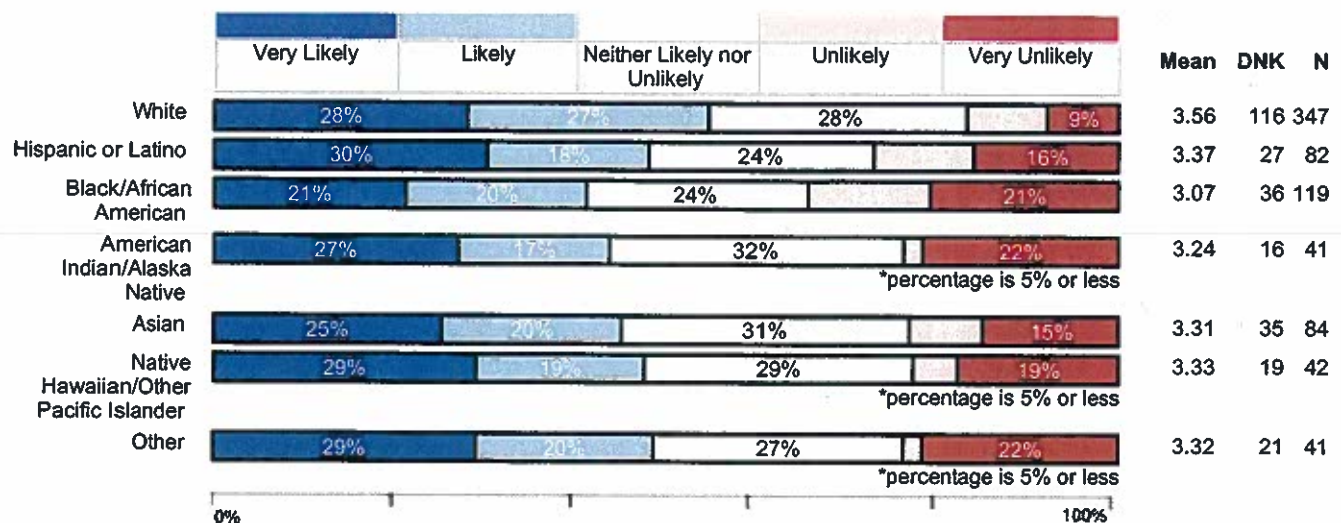
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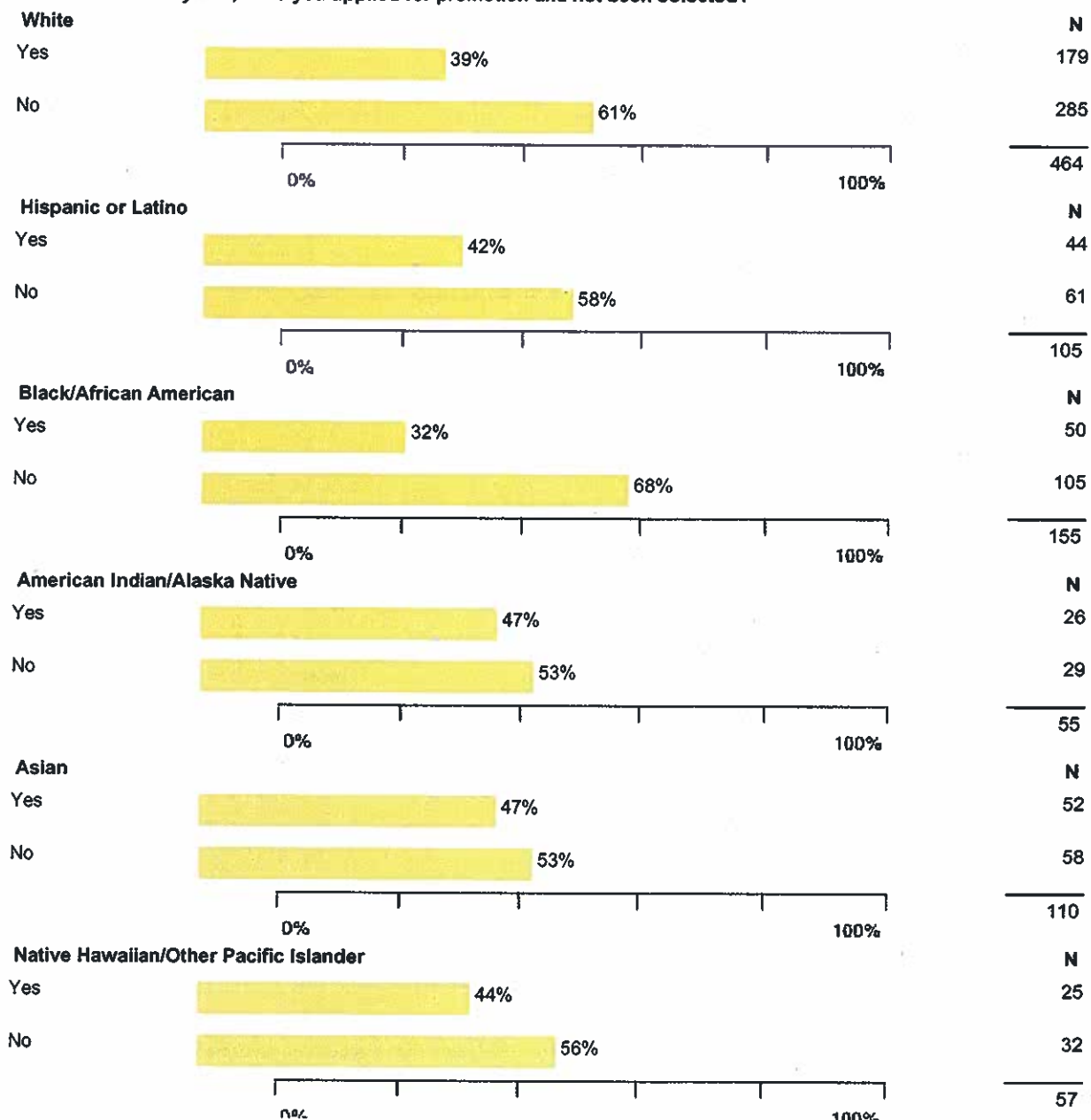


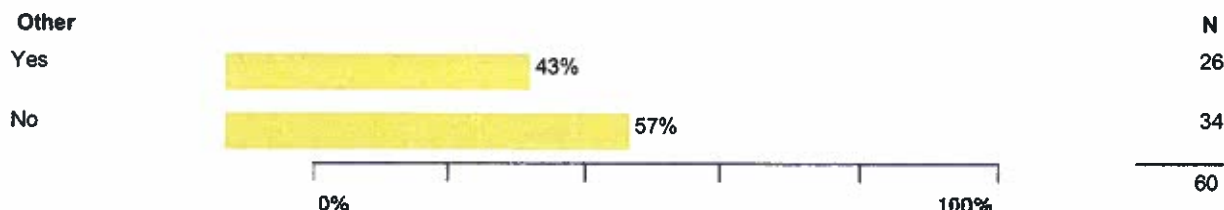
29. If there were a critical/high risk project in your team/unit/office, how likely is it that it would be assigned to you?



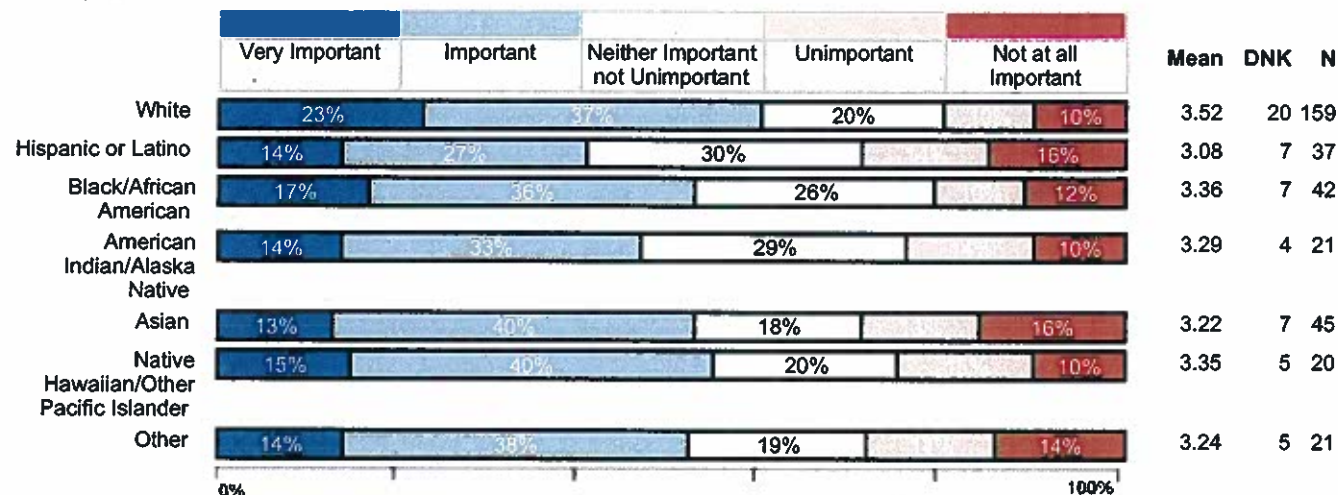


30. In the last five years, have you applied for promotion and not been selected?

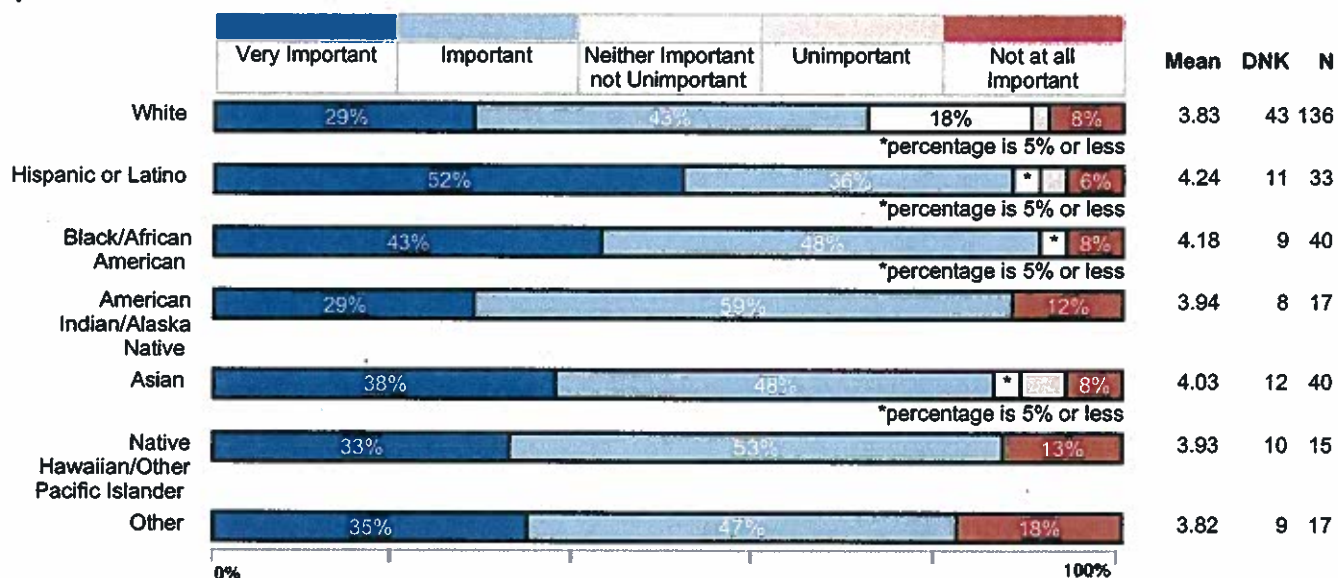




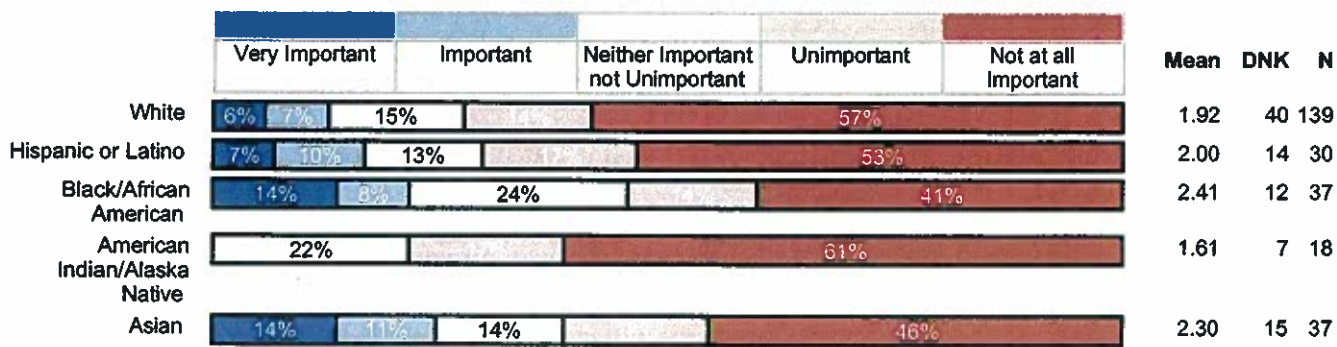
31. How important do you believe the following factor is in your non-selection?: Another candidate was better qualified.

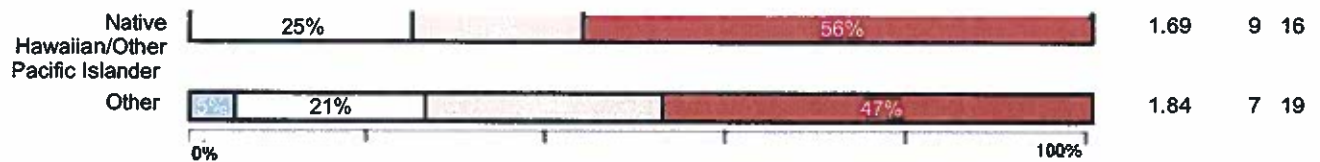


32. How important do you believe the following factor is in your non-selection?: Someone else was "preselected".

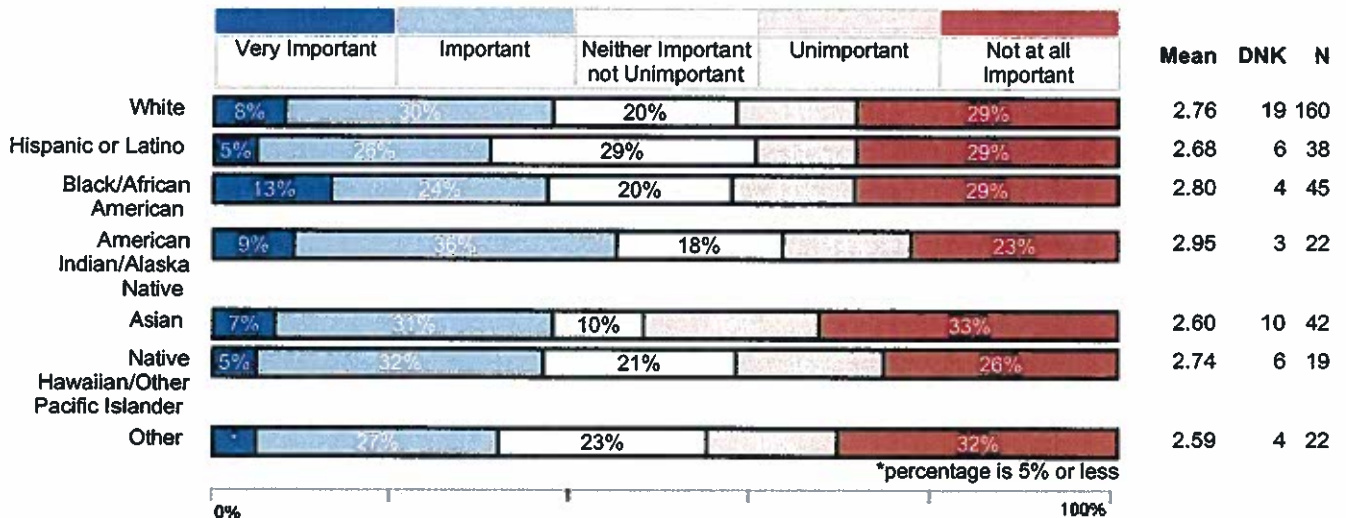


33. How important do you believe the following factor is in your non-selection?: The selecting official did not like me.

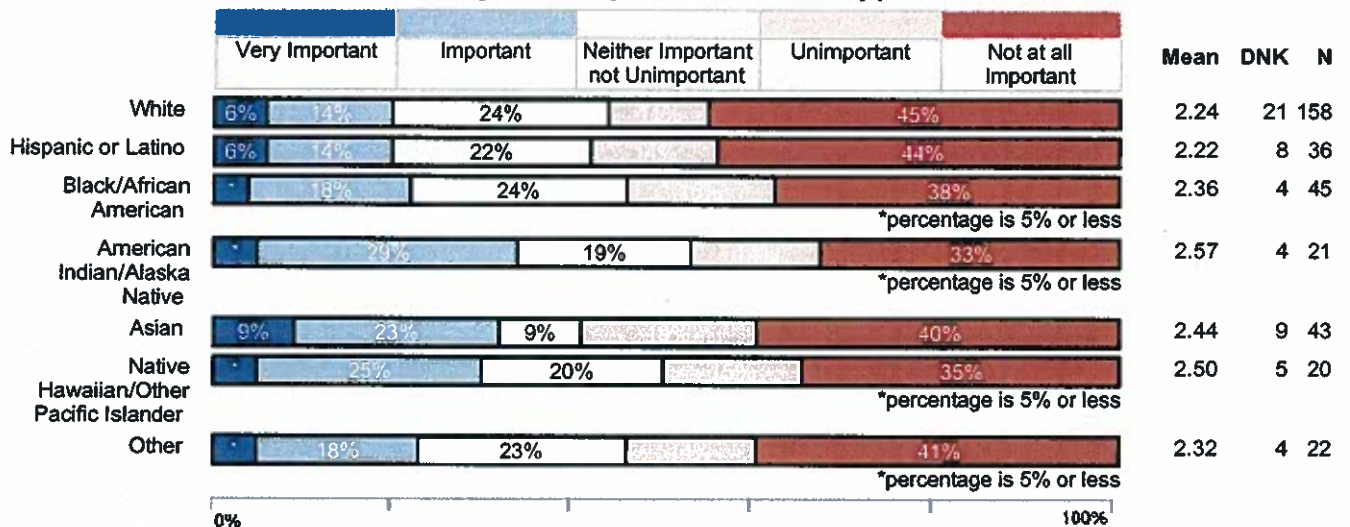




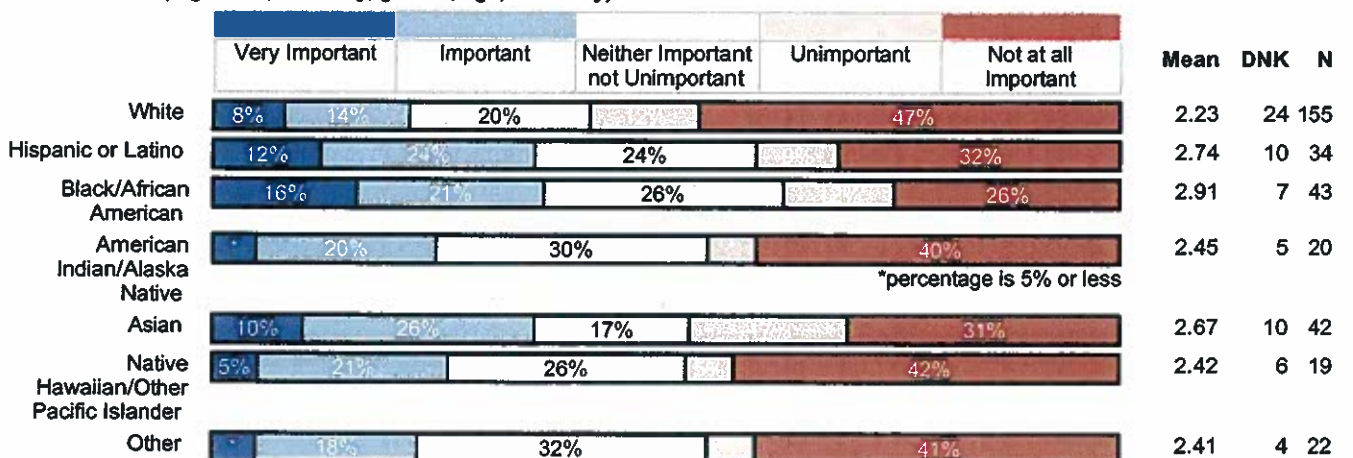
34. How important do you believe the following factor is in your non-selection?: My past performance.

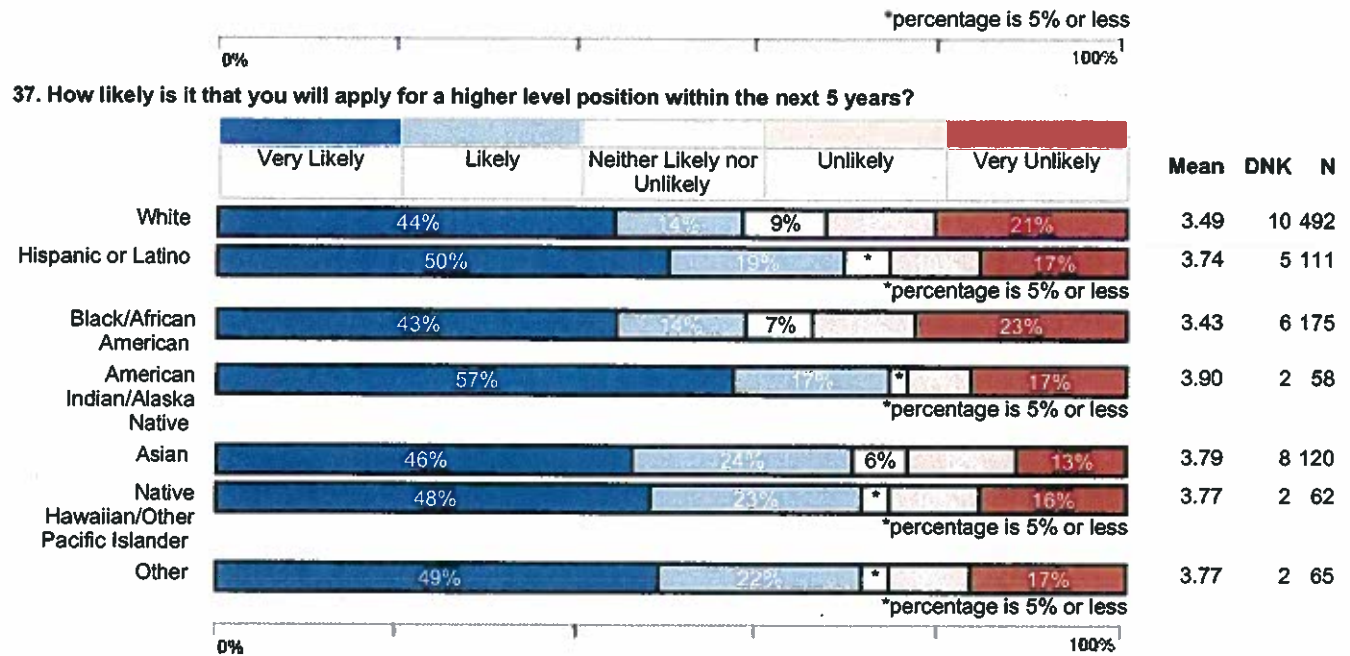


35. How important do you believe the following factor is in your non-selection?: My past conduct.

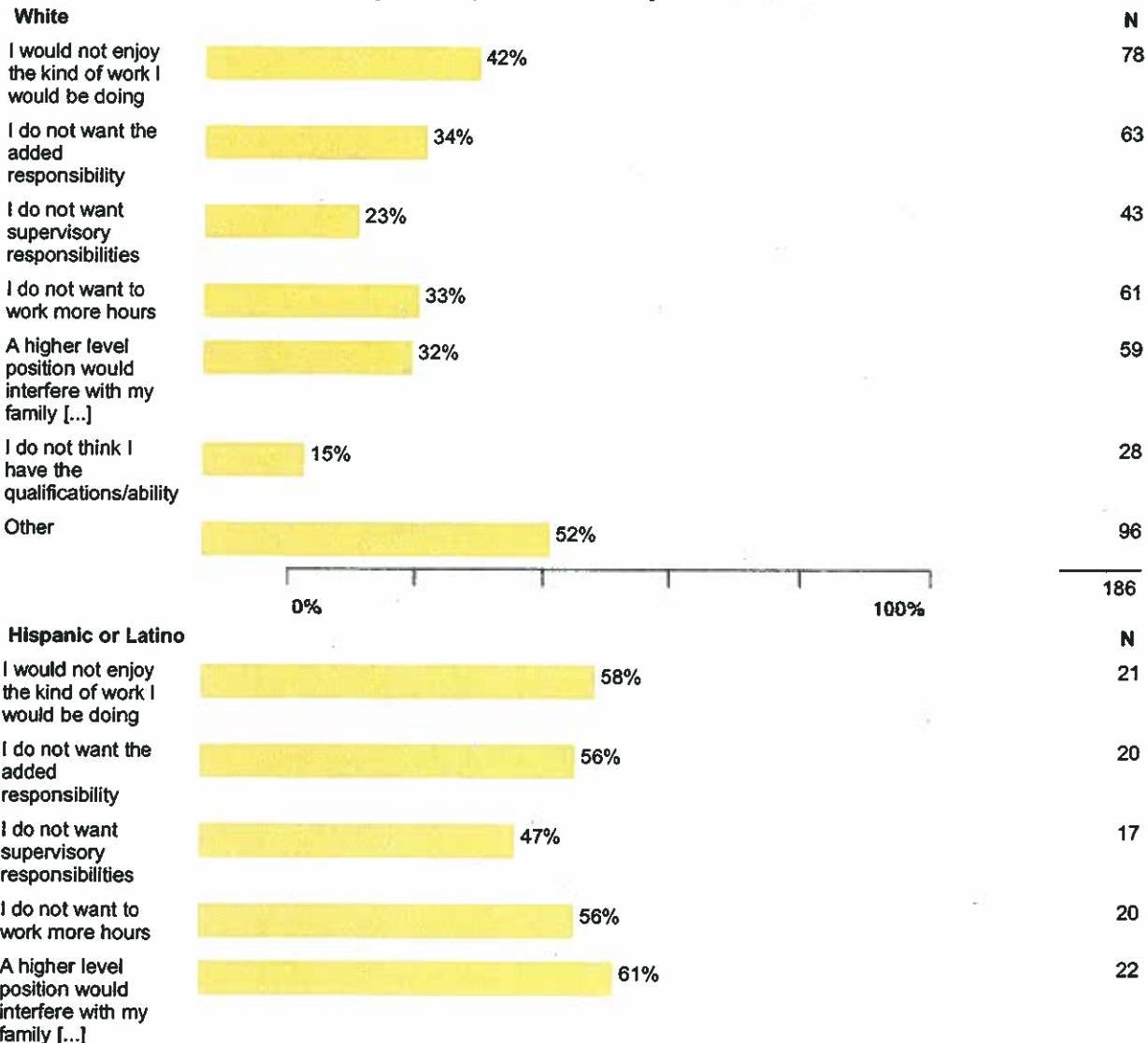


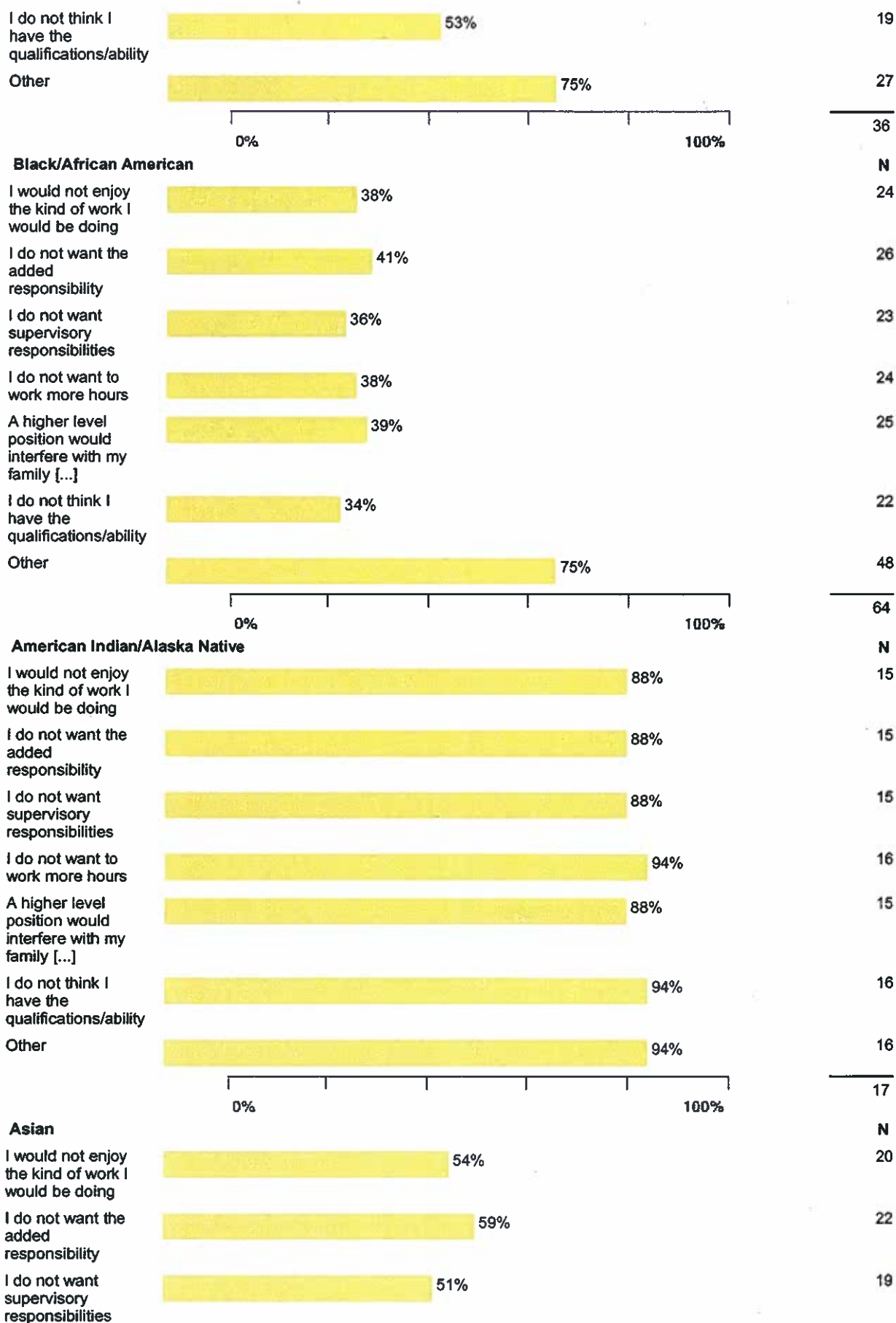
36. How important do you believe the following factor is in your non-selection?: My personal characteristics (e.g., race, ethnicity, gender, age, disability).

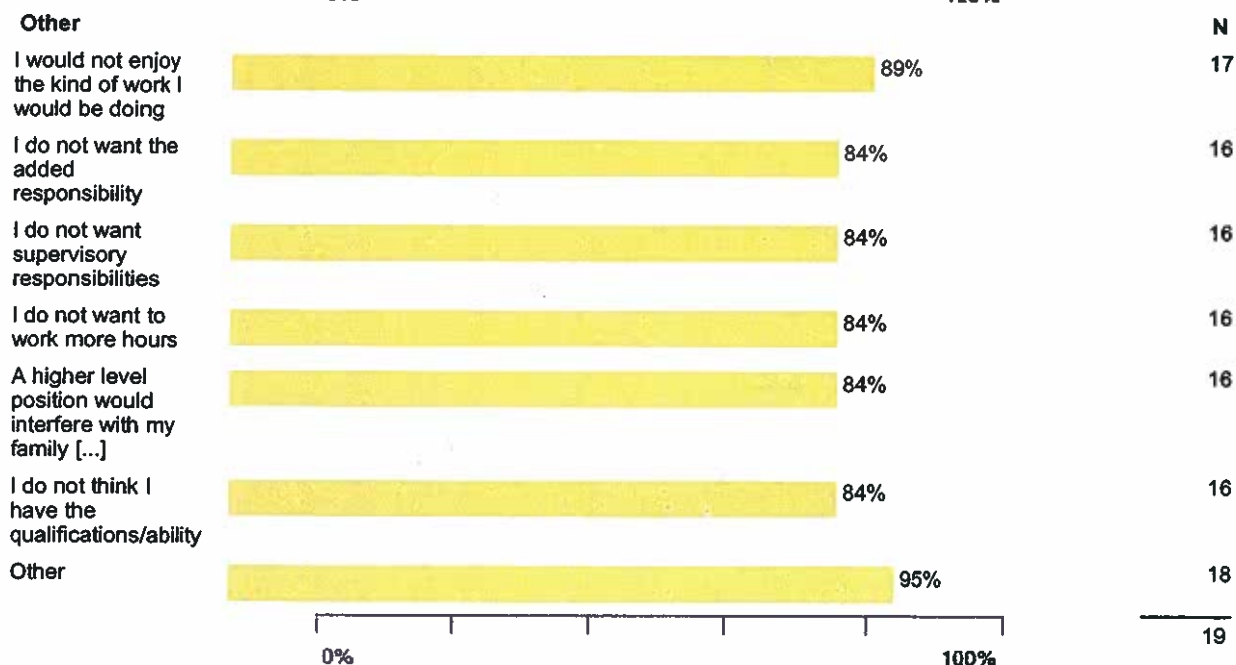
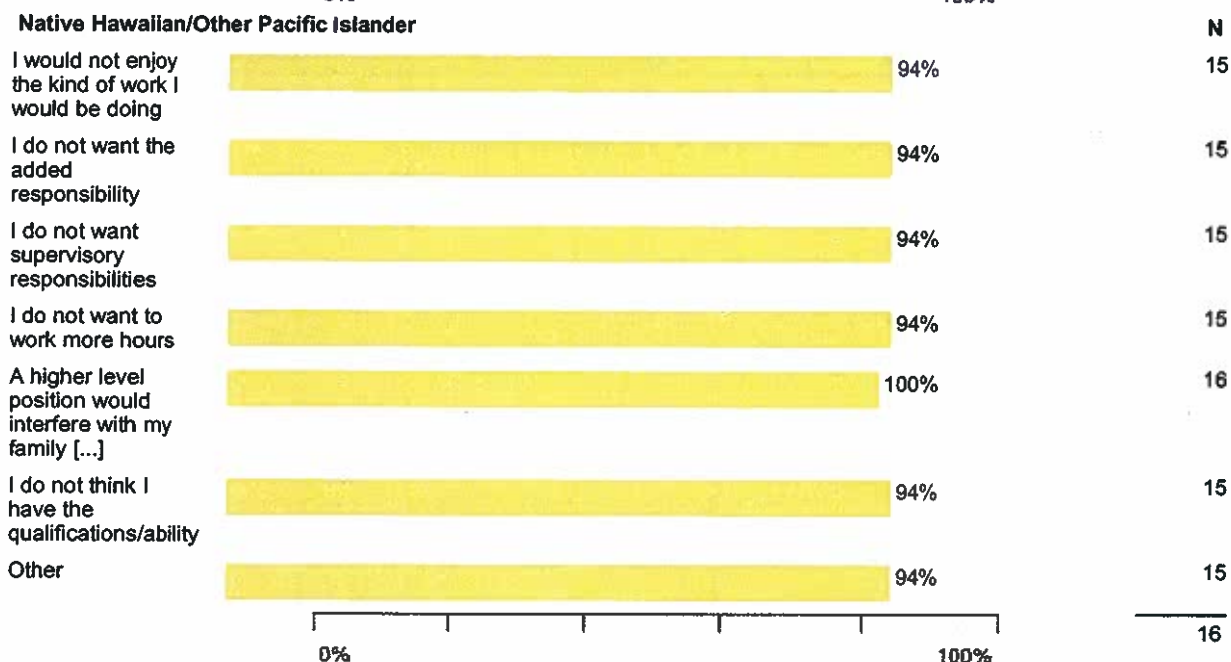
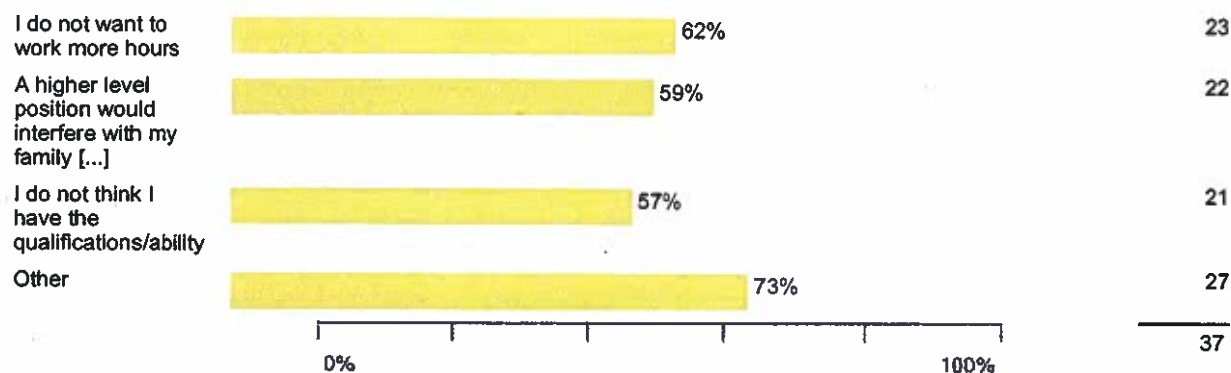




38. If you are unlikely to apply for a higher level position, what are your reasons?

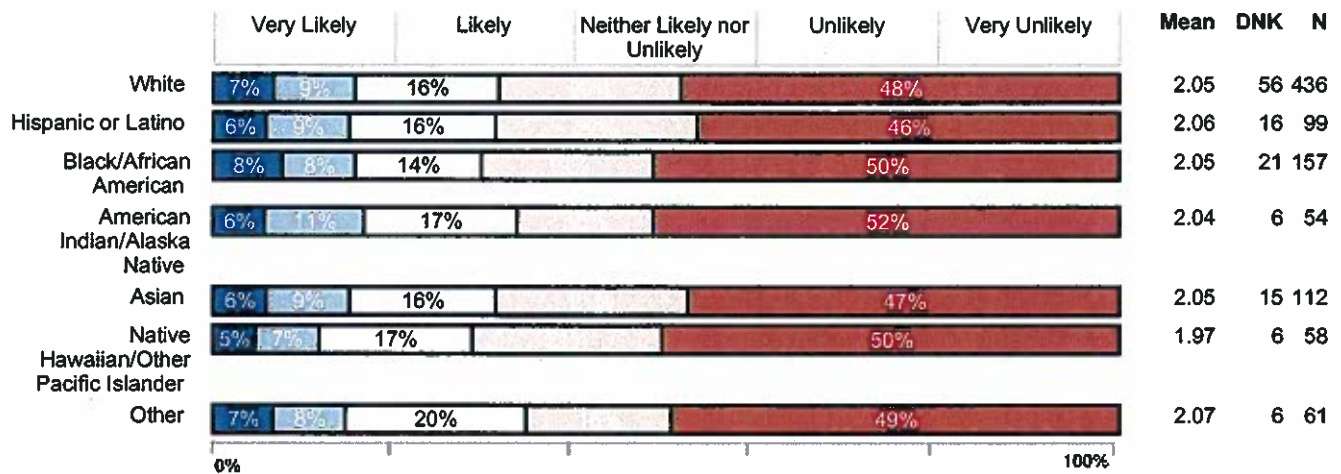




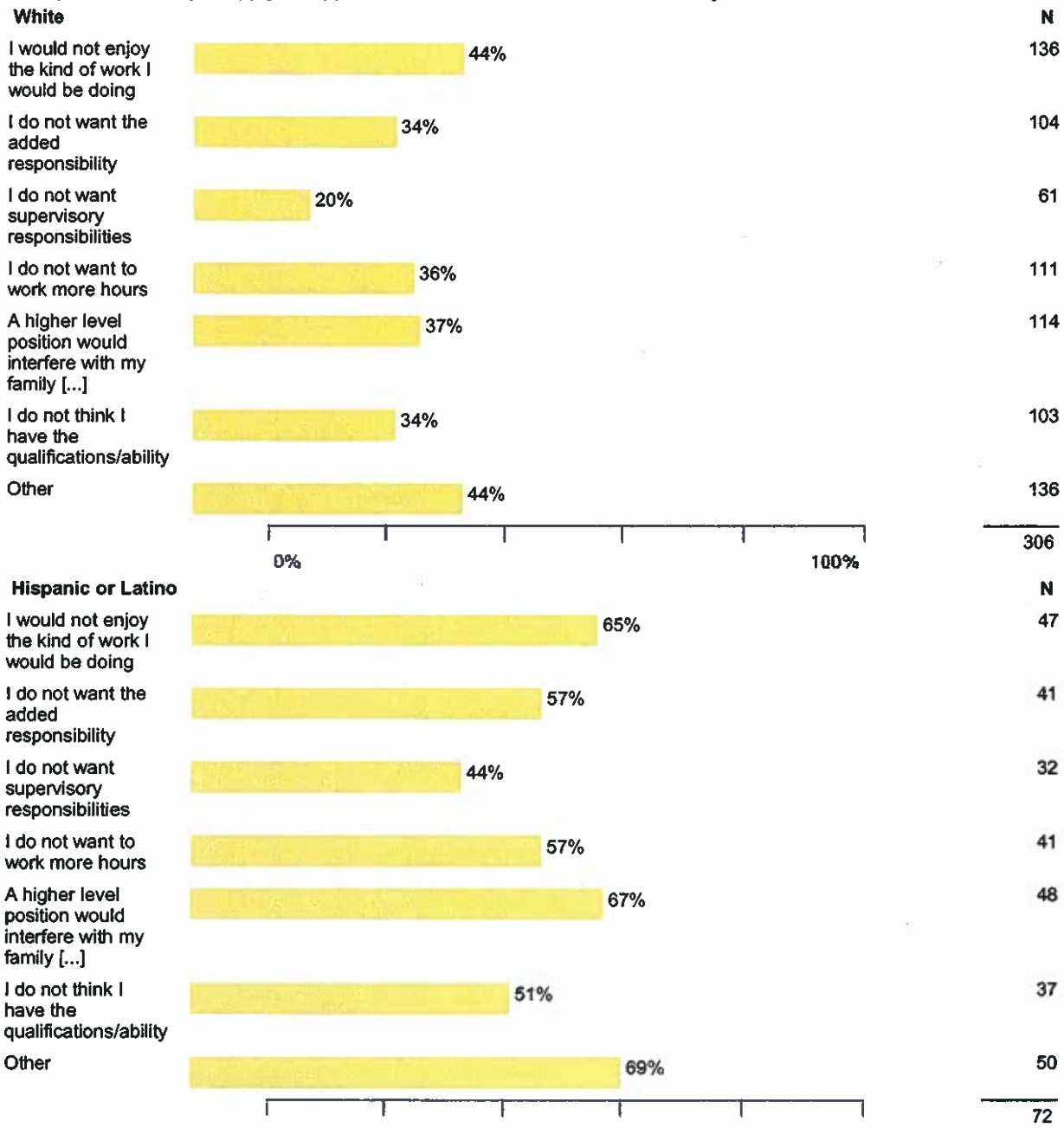


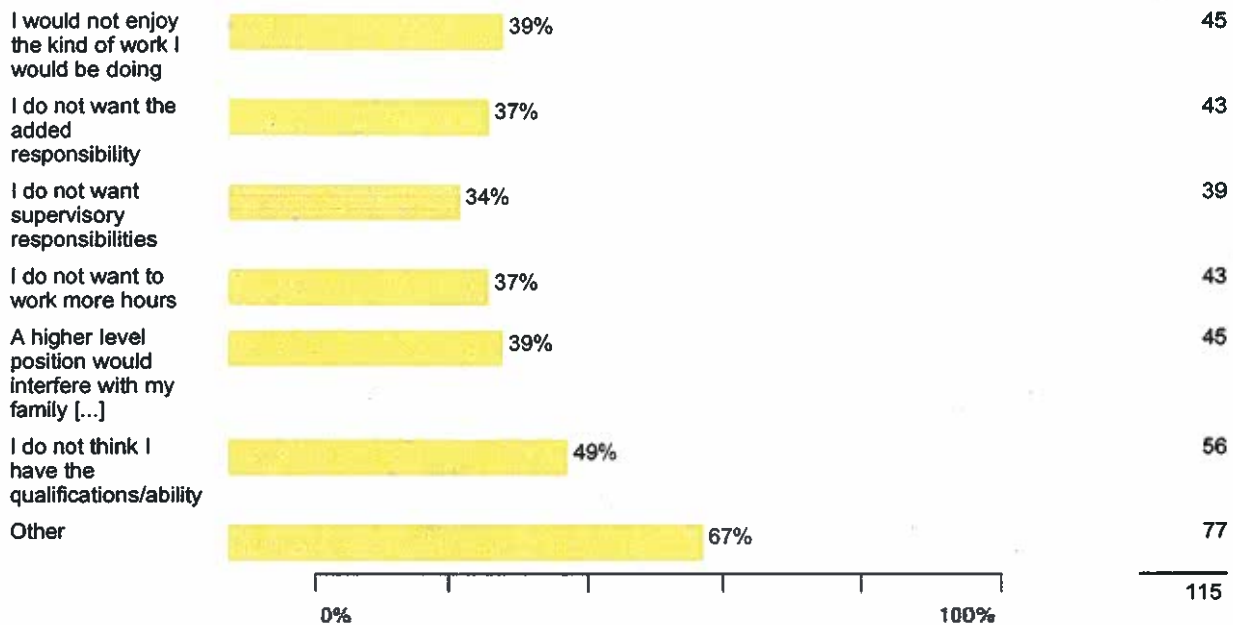
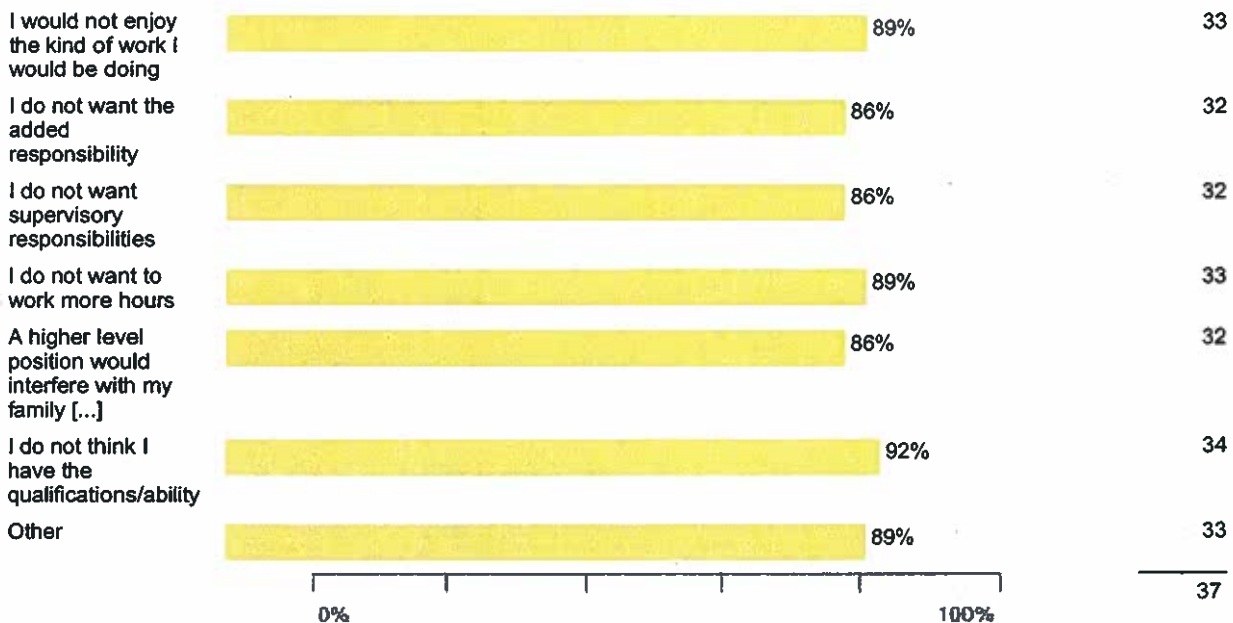
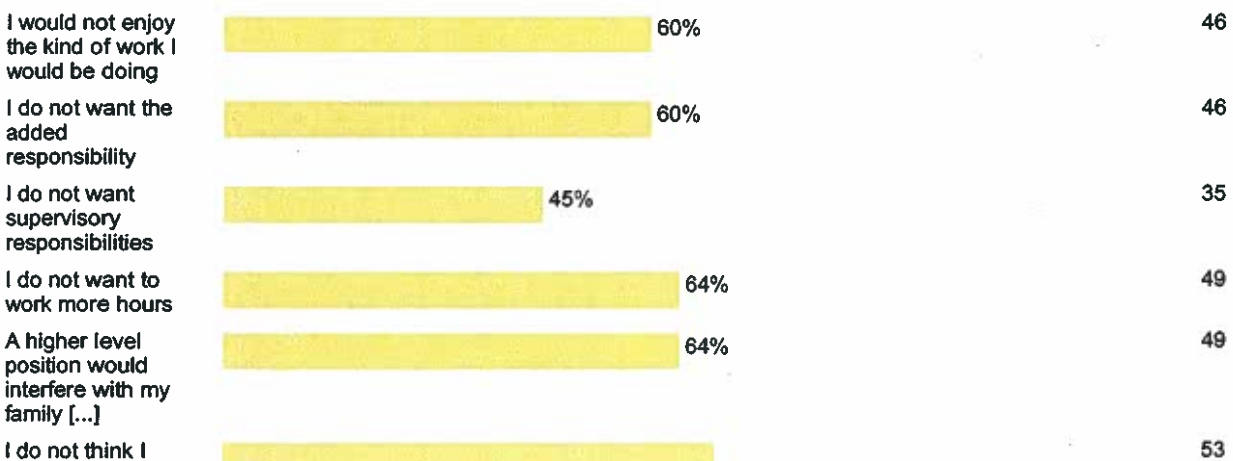
39. How likely is it that you will apply for appointment to the SES or the Executive Candidate Assessment and Development Program?

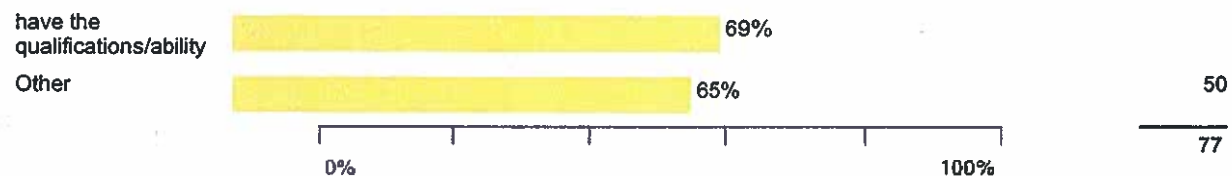
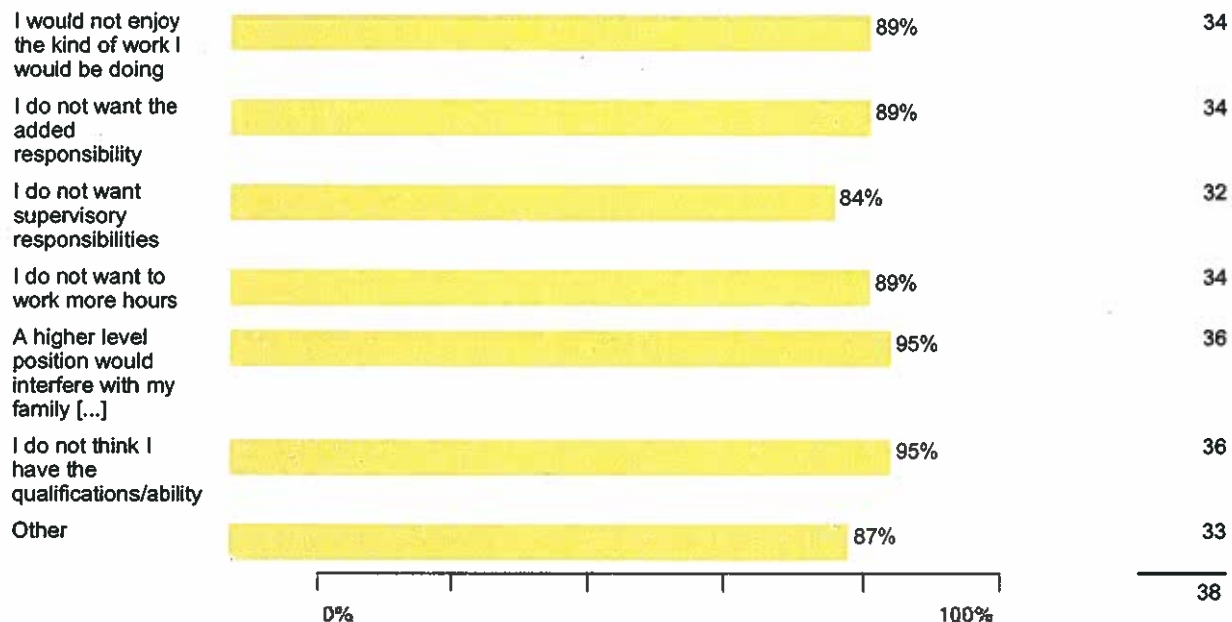
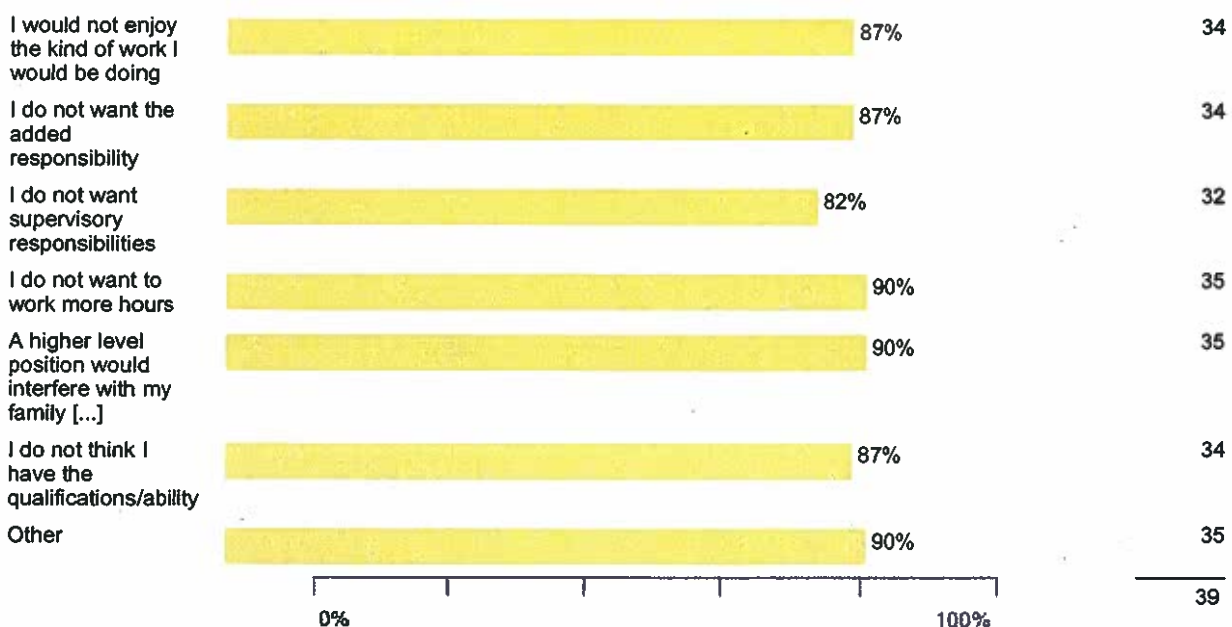


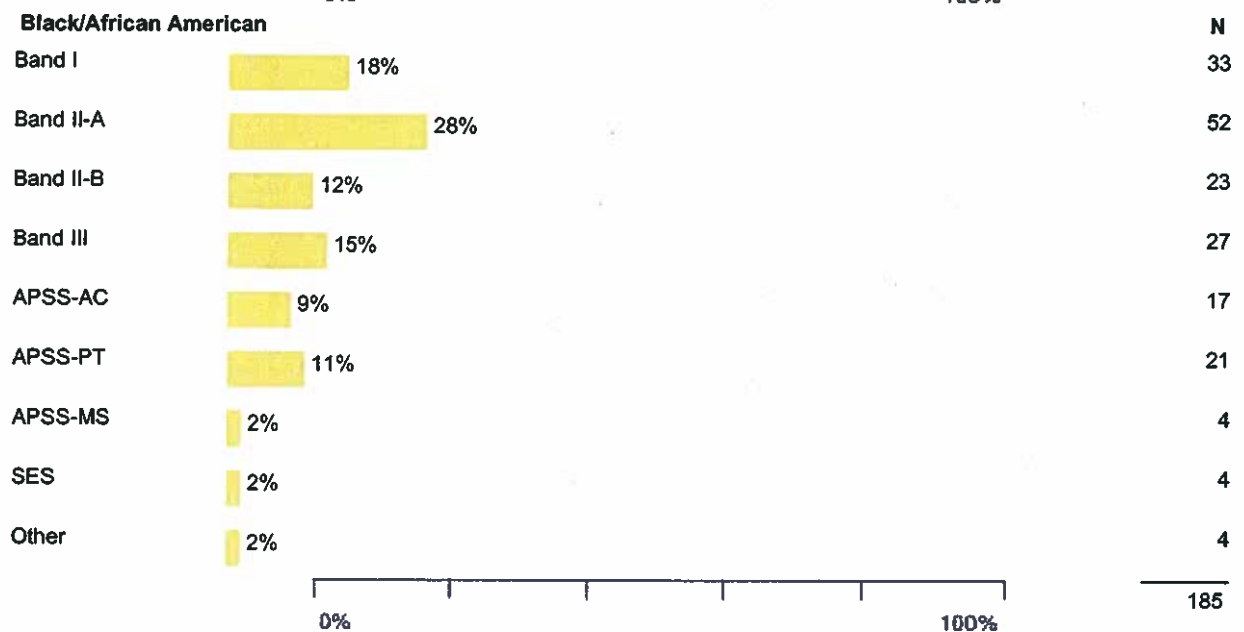
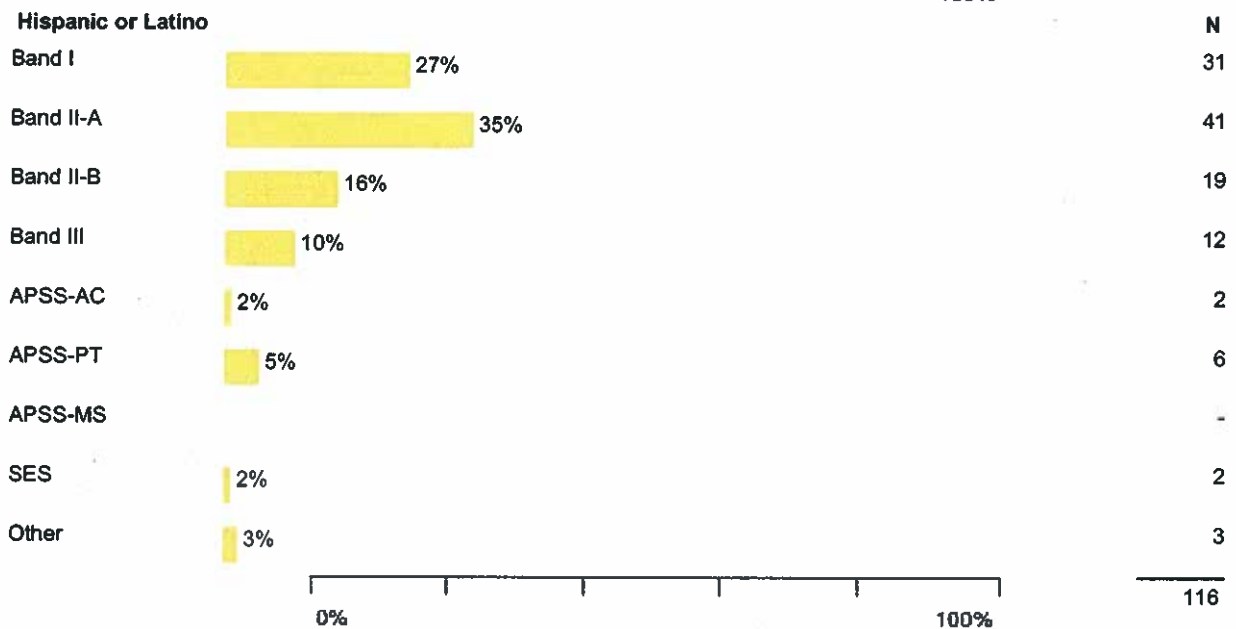
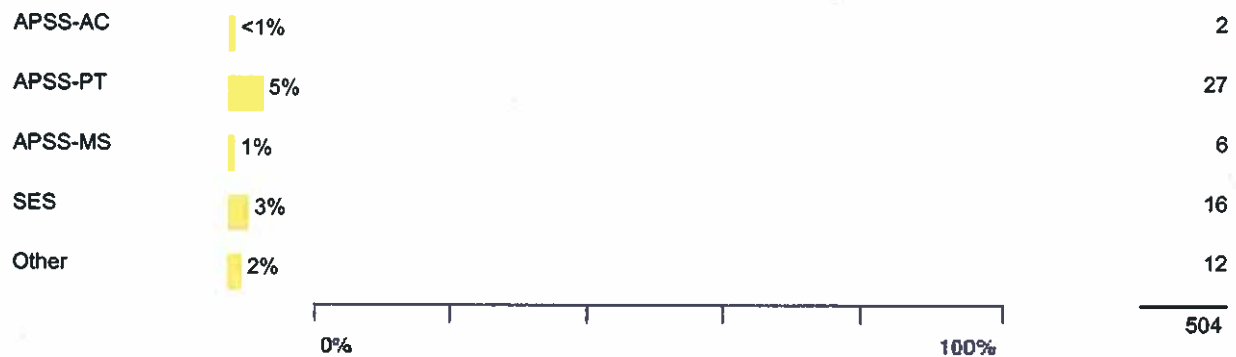


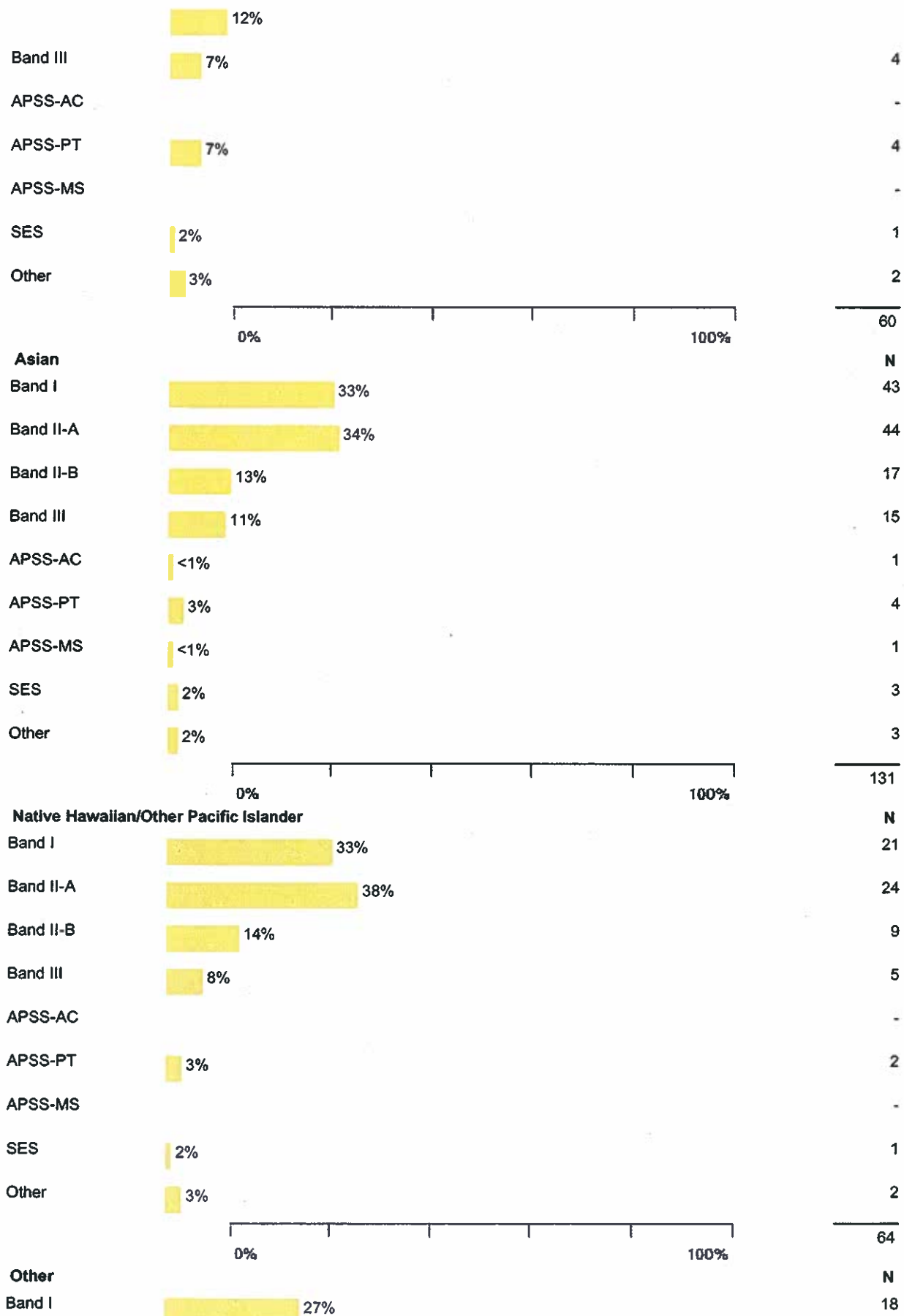
40. If you are unlikely to apply for appointment to the SES or ECADP, what are your reasons?

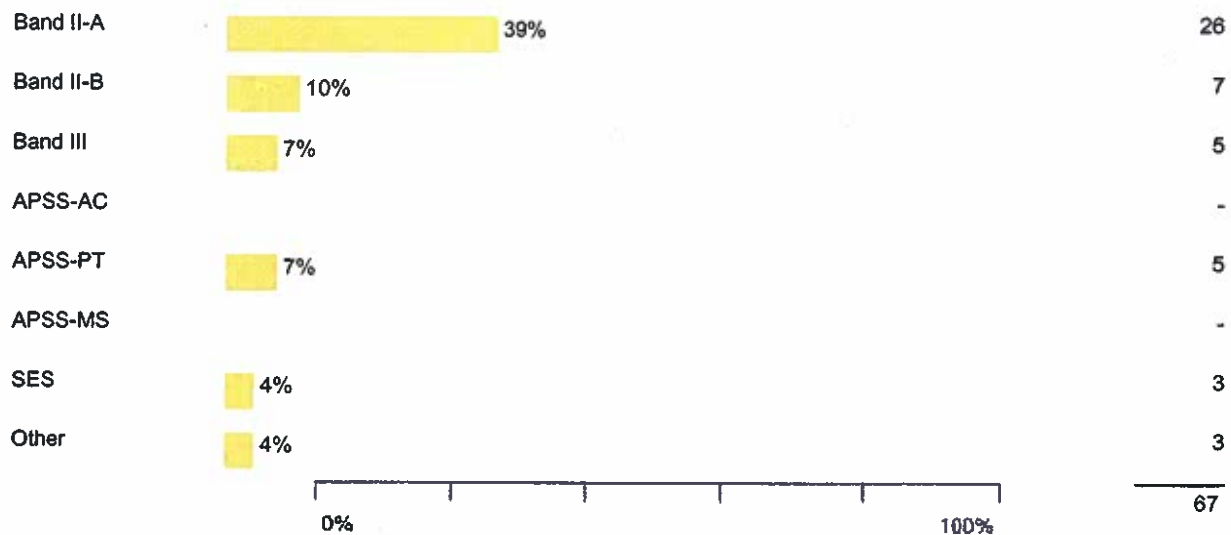


Black/African American**N****American Indian/Alaska Native****N****Asian****N**

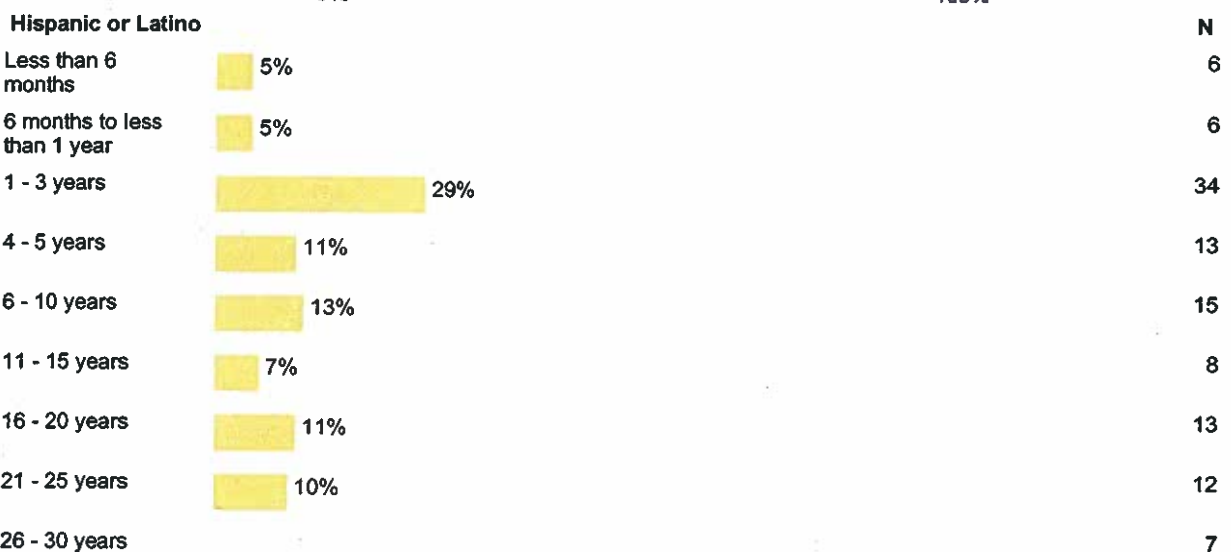
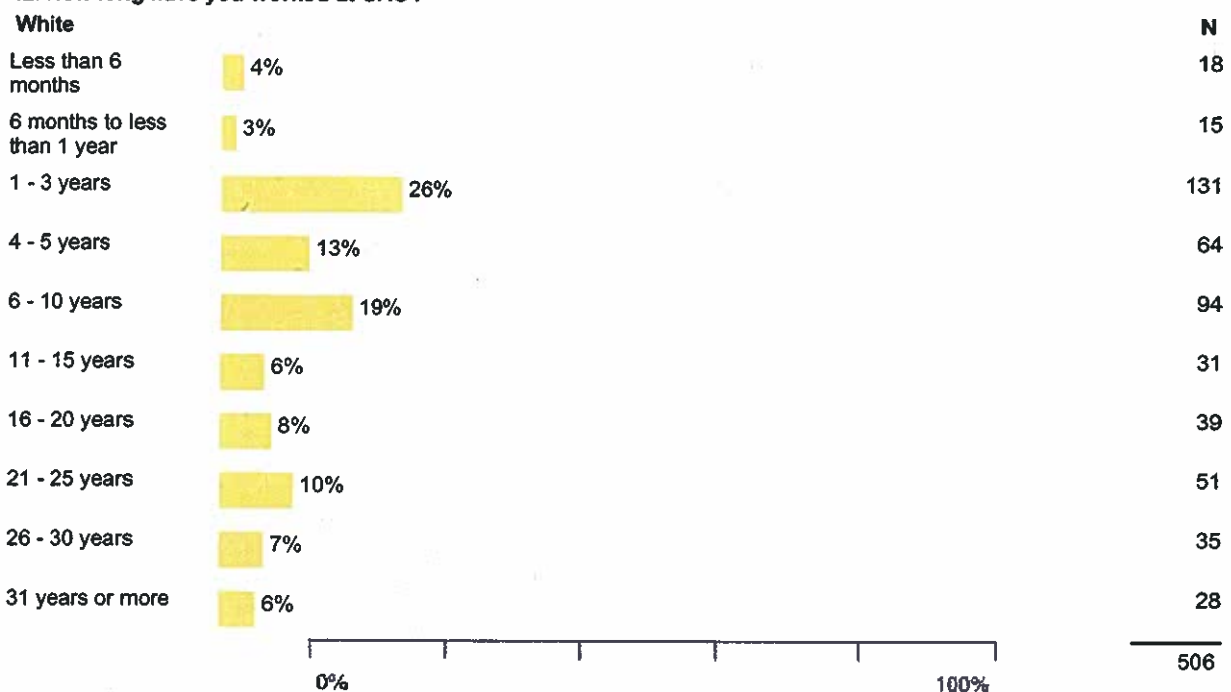
**Native Hawaiian/Other Pacific Islander****Other****41. What is your pay band?**

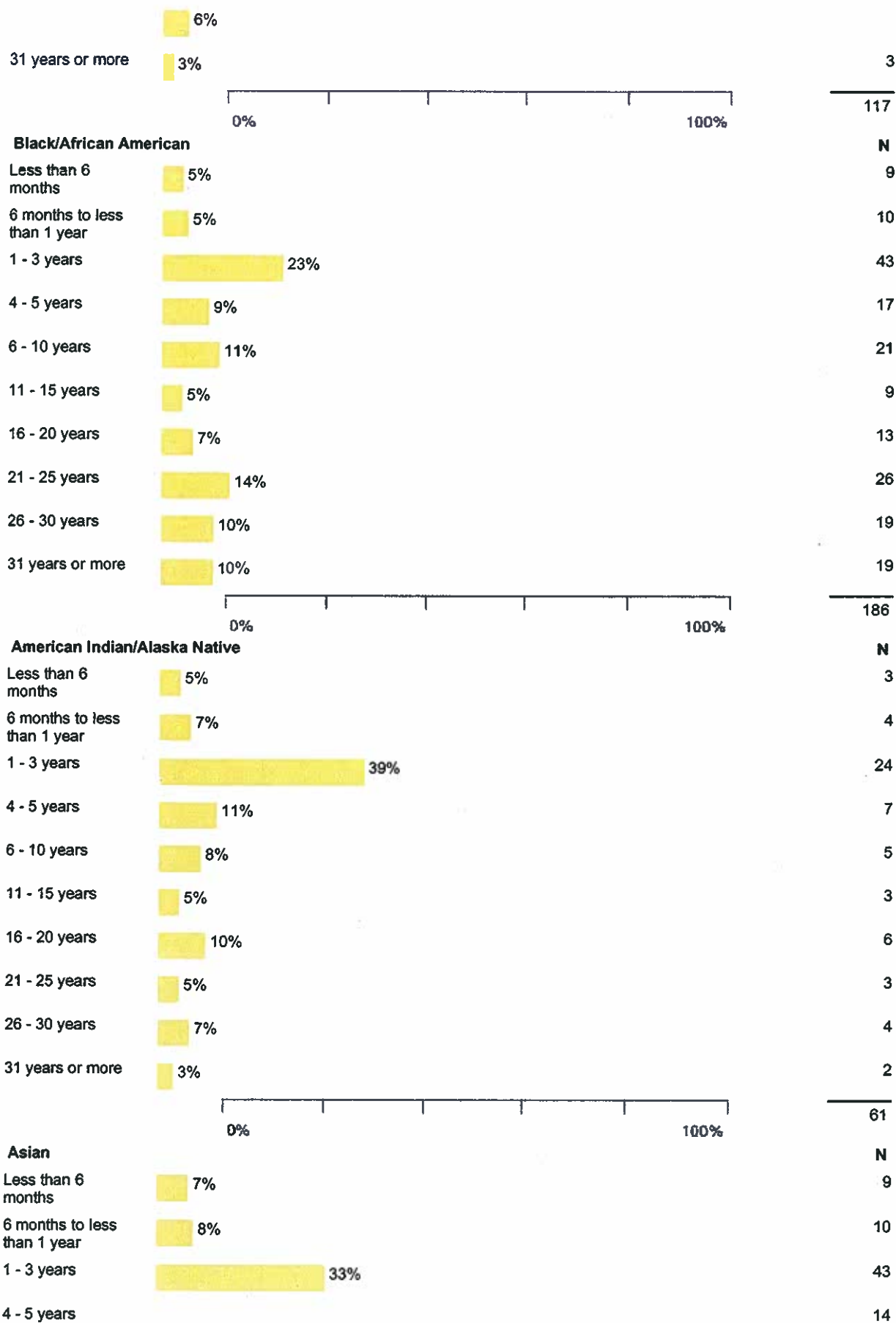


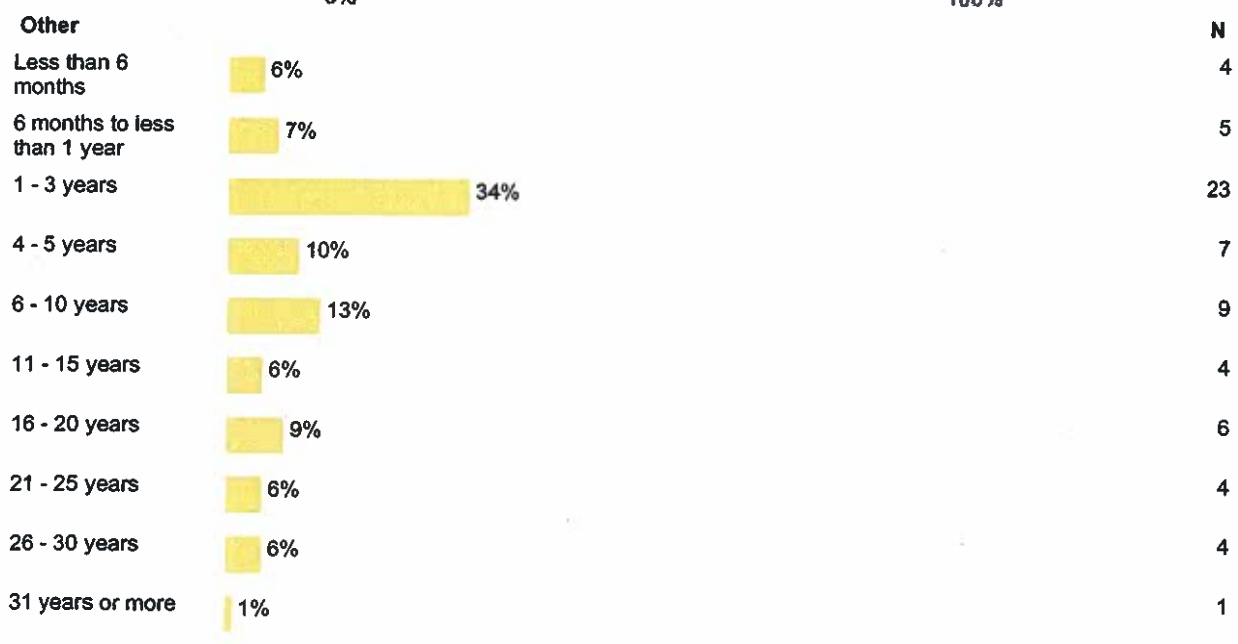
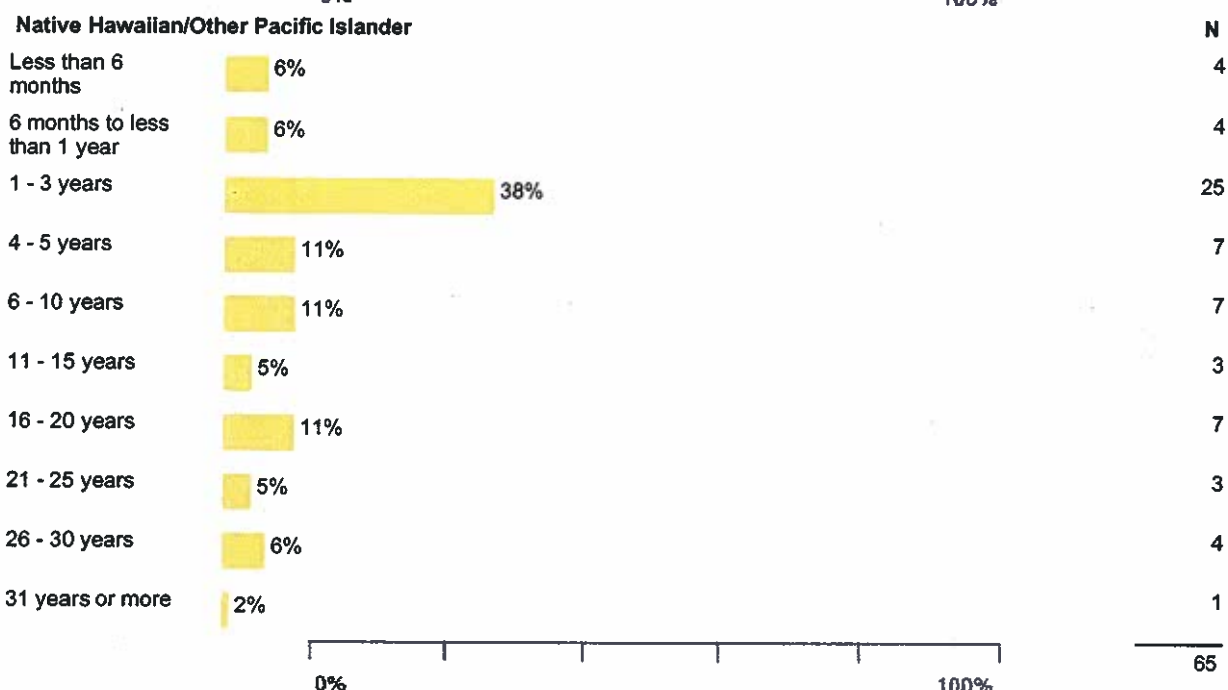
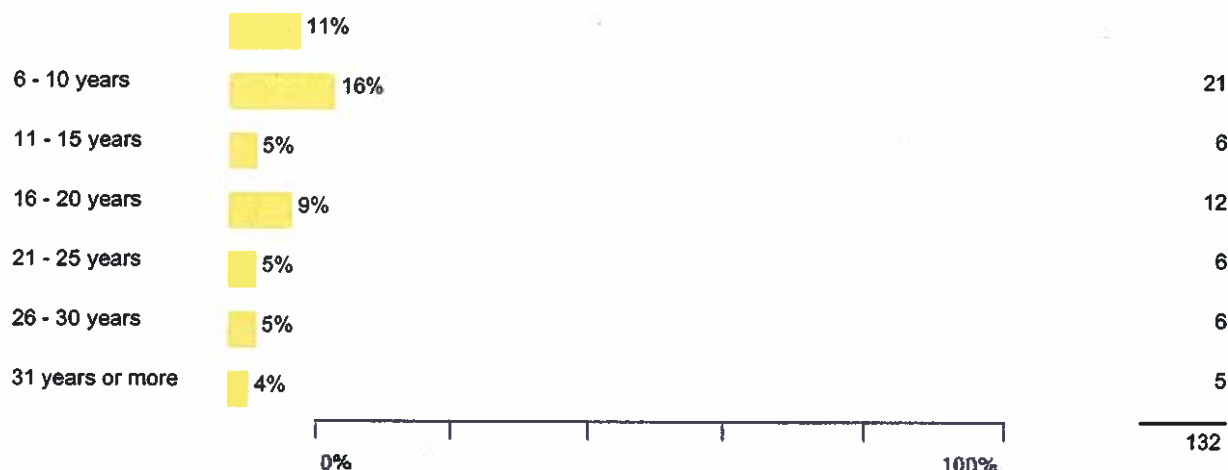


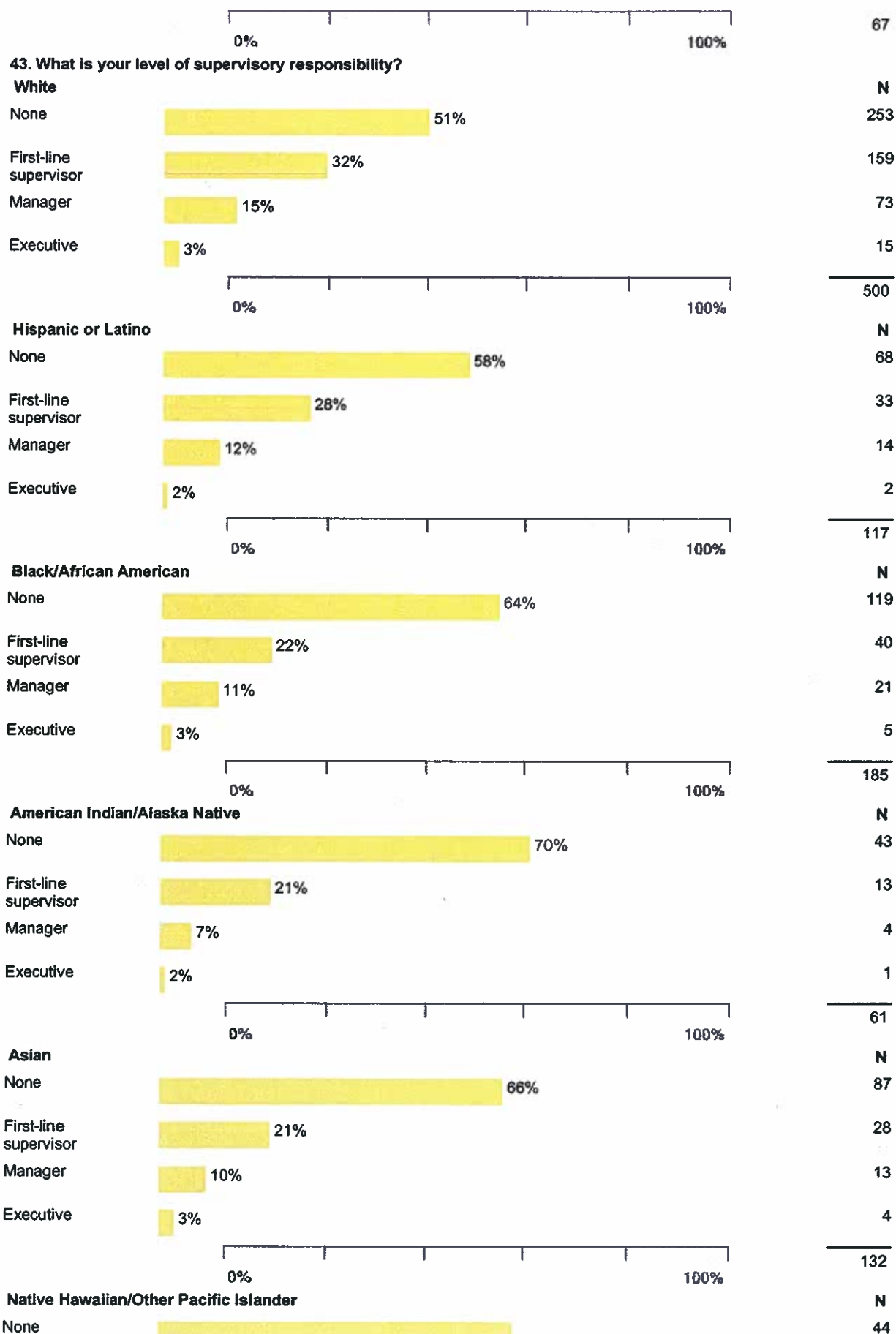


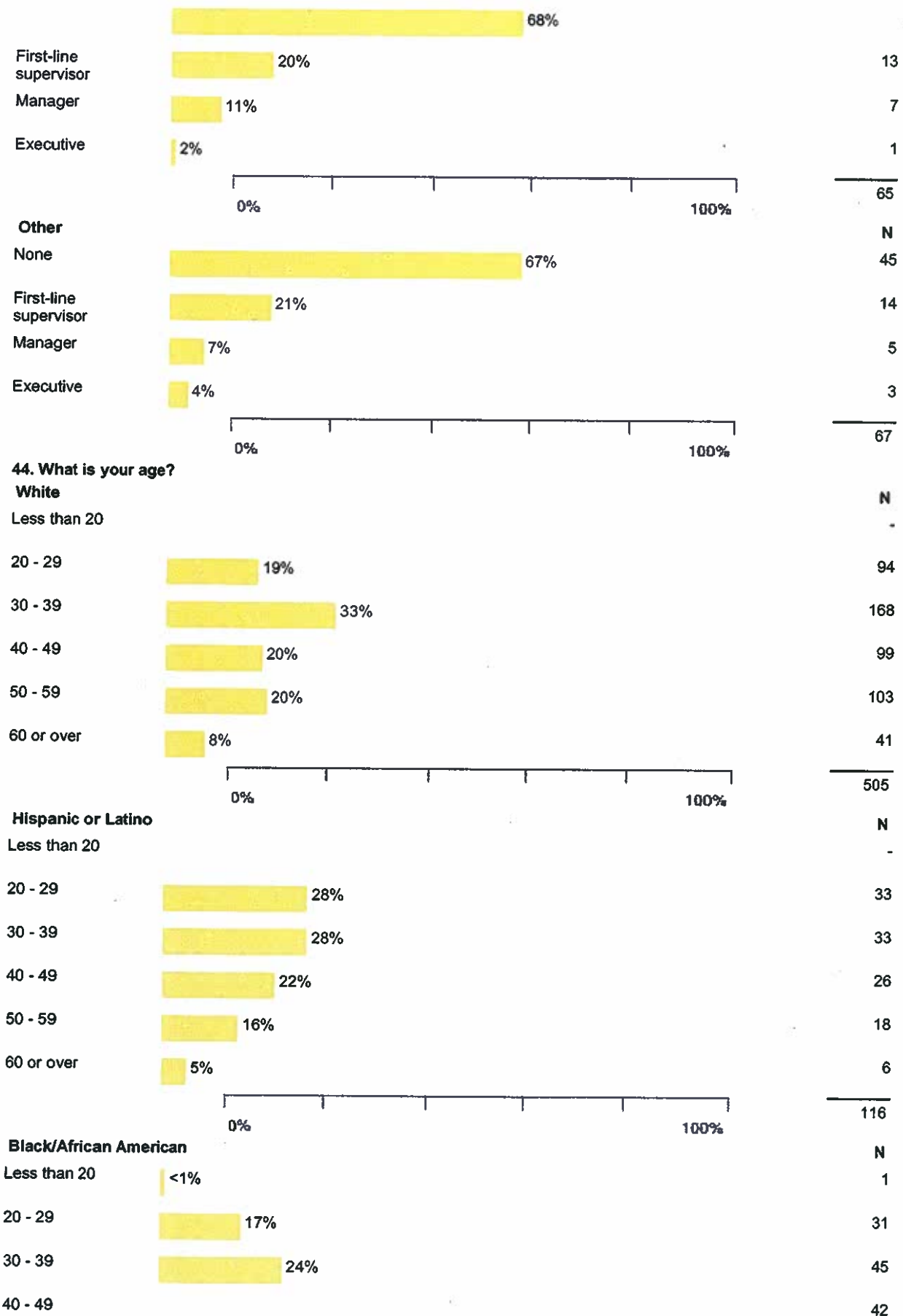
42. How long have you worked at GAO?

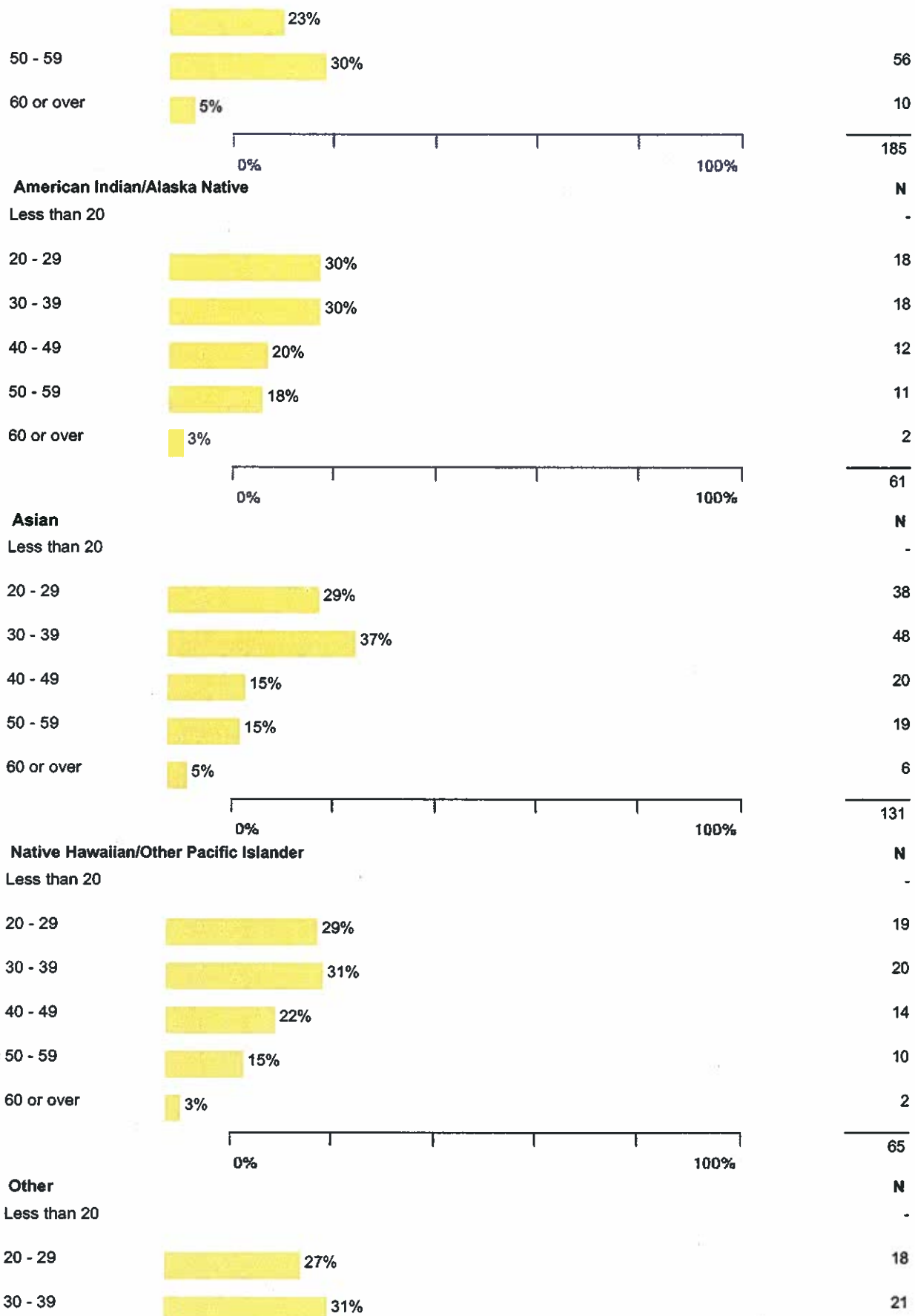


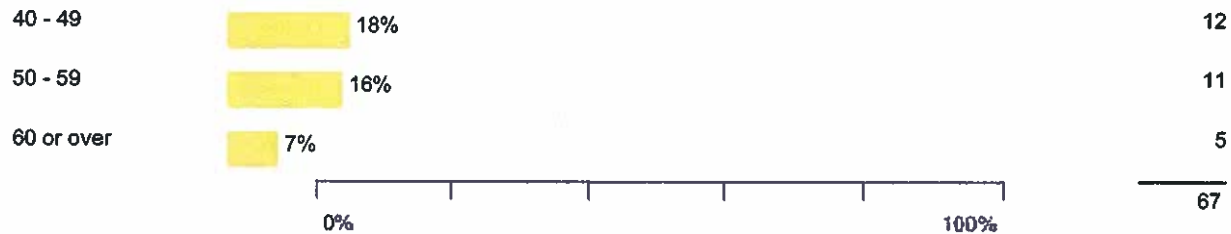




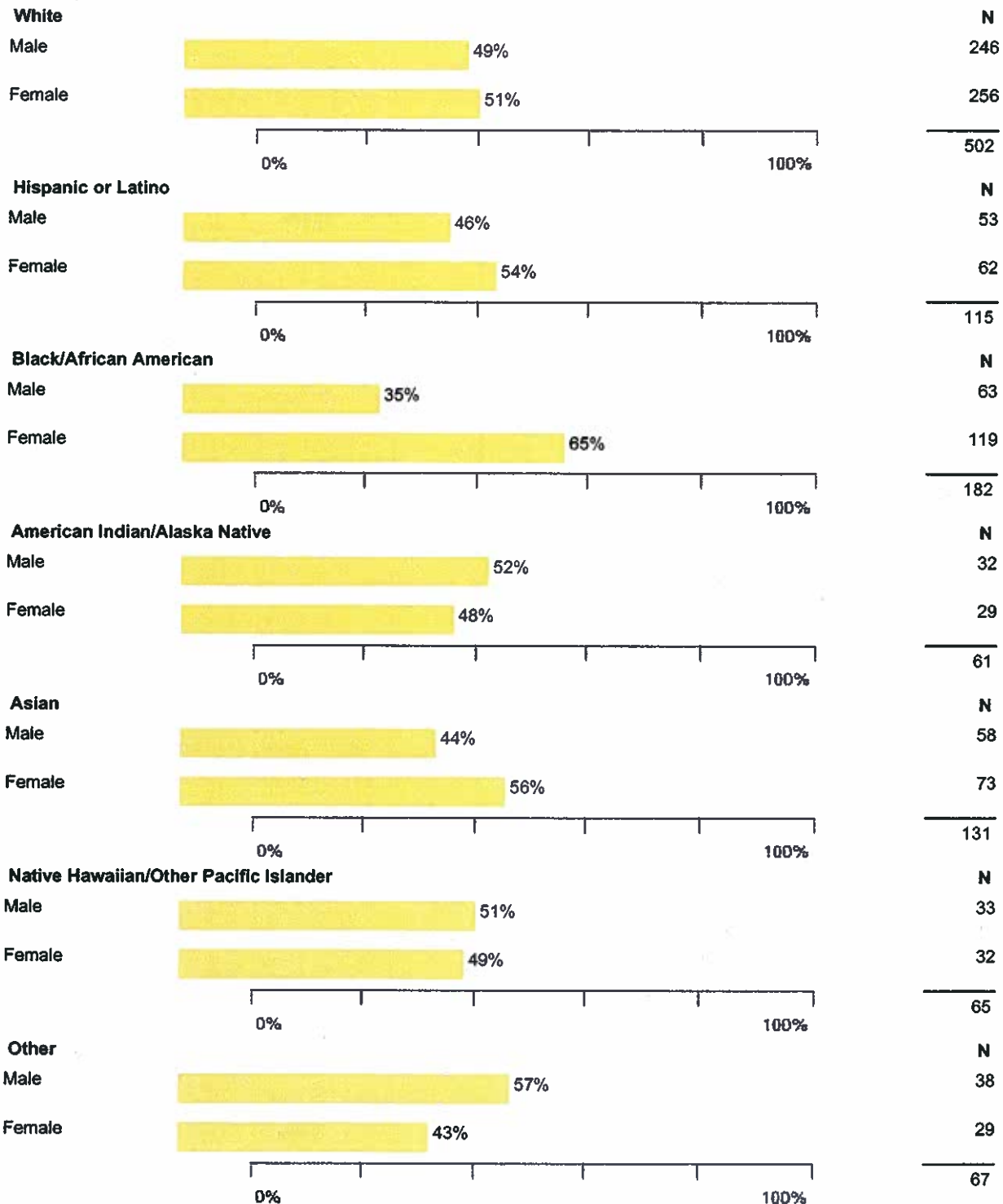






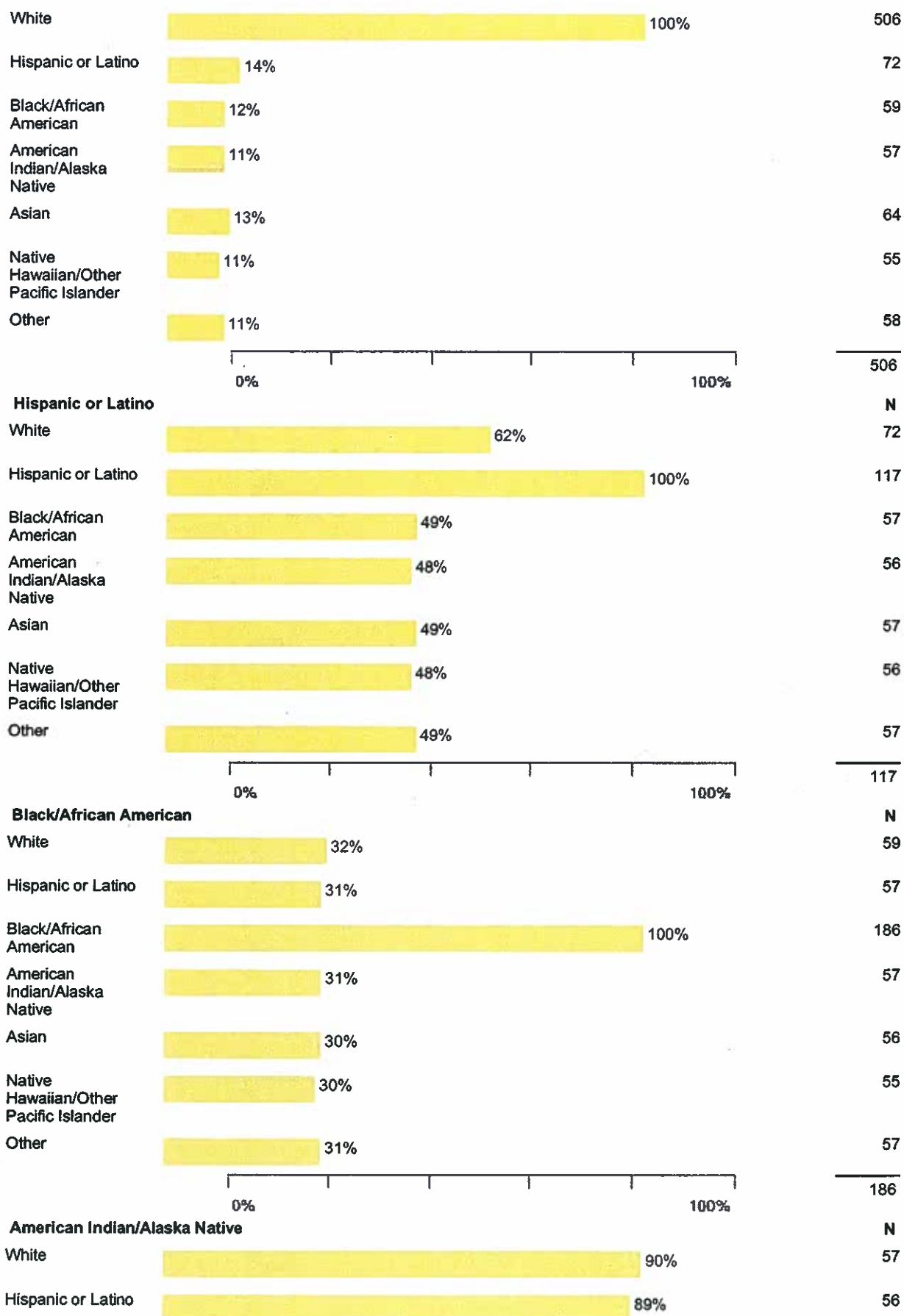


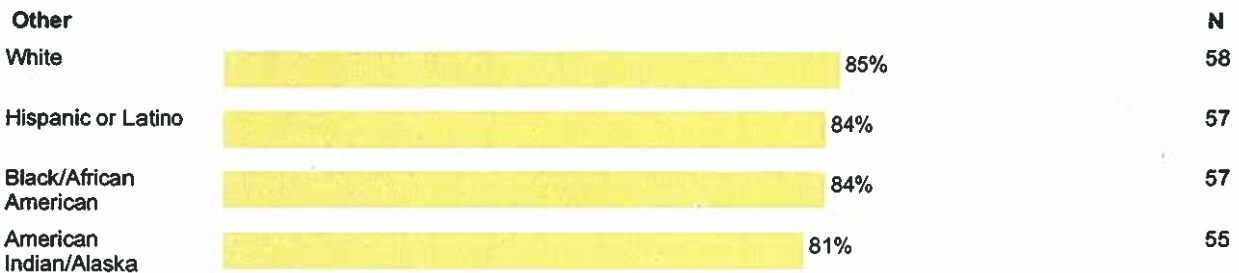
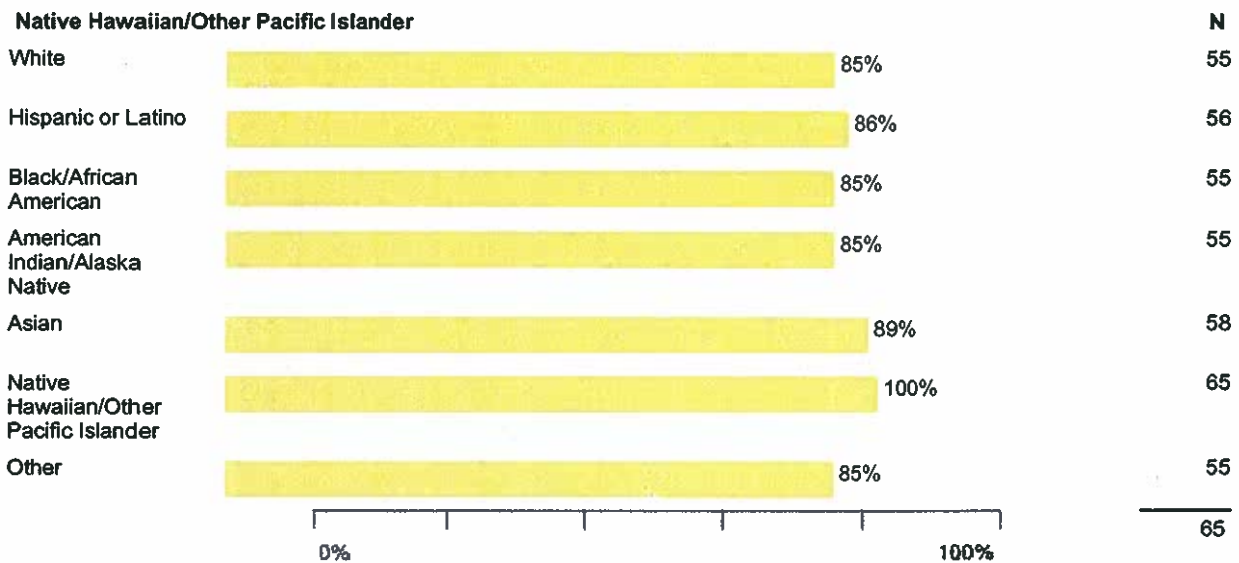
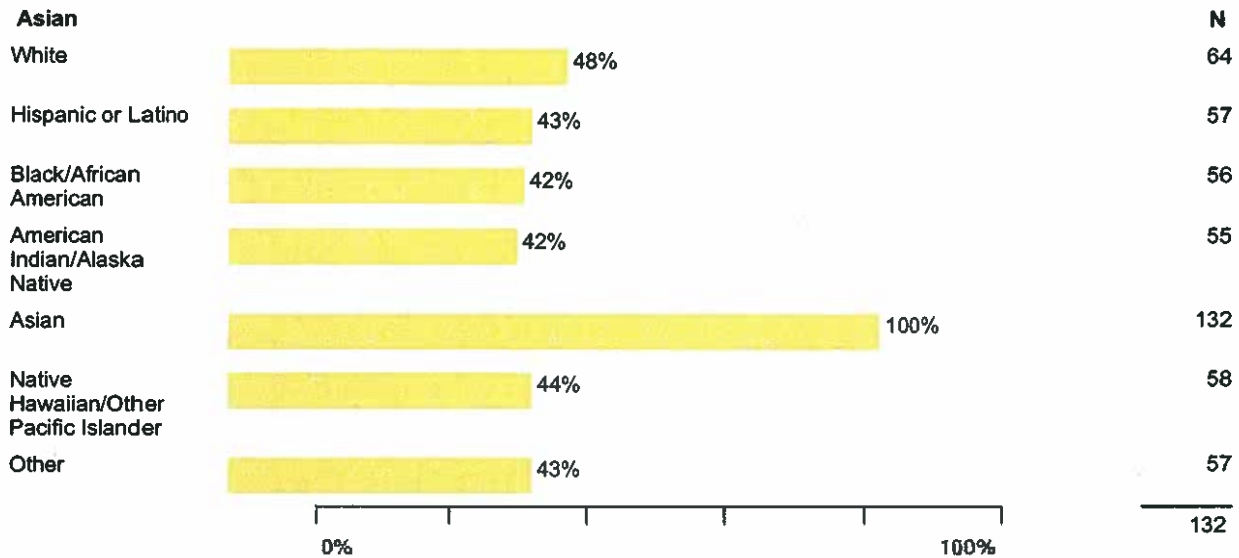
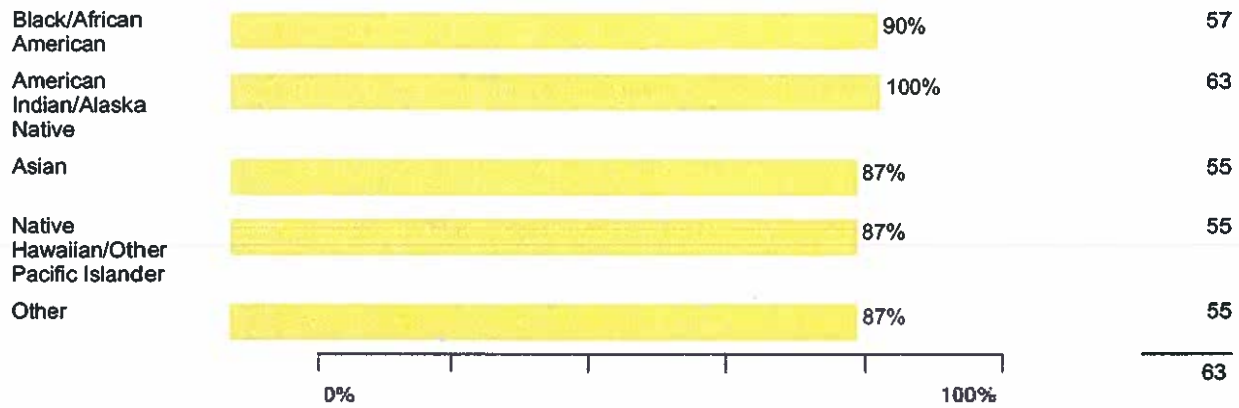
45. Are you male or female?



46. What is your race/ethnicity? (Select one or more)

Race/Ethnicity	Count
White	N







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