
WOMEN IN THE GAO WORKFORCE



Personnel Appeals Board



Personnel

Appeals

Board

November 23, 2010

The Honorable Gene L. Dodaro
Acting Comptroller General
U.S. Government Accountability Office
Room 7000
441 G Street, NW
Washington, DC 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 Women in the Workforce at GAO.

Sincerely,

Mary E. Leary
Chair

Attachment

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Women in the GAO Workforce

Chapter I: Introduction

In the course of a recent study of equal employment opportunity at the Government Accountability Office (GAO or the Agency), the Personnel Appeals Board (PAB or the Board) became acutely aware of the prodigious gains that women have made at the Agency over the past three decades. Women outnumber men at GAO as they have, occasionally, in the past but the difference in 2010 is that they are nearly 45% of the SES corps, lead the majority of mission teams, and constitute two-thirds of the Executive Committee.¹ The Agency has changed dramatically since the Board first began monitoring GAO's regulations, procedures and practices as they relate to laws prohibiting discrimination in employment. When Congress created the Board in 1980, women were clustered in the lower grades (GS-1 through GS-8) where they outnumbered men by a 4 to 1 ratio and they were virtually nonexistent in the higher echelons.

Although the Board has typically directed its Oversight reviews at certain discrete areas of equal employment opportunity that derive from specific issue areas or programmatic concerns, on several occasions the Board has undertaken studies of issues in the context of a particular protected group of employees.² In the case of women in the Agency, their record of accomplishments by 2010 led the Board to pursue this study of women at GAO, which not only

¹ *The Senior Executive Service (SES) at GAO* at 25, Personnel Appeals Board (July 2010). The Board's oversight reports can be found on its web site, www.pab.gao.gov under the link to "EEO Oversight."

² For example, the Board has issued reports on the employment of persons with disabilities and the employment of Hispanics at GAO, as well as a report on minority recruitment. The Board is currently in the midst of a study of the employment of Asian Americans at GAO which is focusing on diversity in the Agency's management and leadership ranks and certain other issues relating to that group.

charts their rapid ascent at the Agency but looks at women across the Agency spectrum, in order to ascertain whether all women have shared equally in the recent gains at GAO.³

History

When the Agency was established in 1921, its primary function was clerical, involving the review and audit of the Federal government's expenditure vouchers. In those early days, the Agency was 58.5% male and 41.5% female and stayed near to those percentages for many years.⁴ Things changed abruptly, however, during World War II when defense spending increased substantially resulting in much more work for GAO, which was charged with processing all of the war-related vouchers. As more and more men joined the military after the United States entered World War II, large numbers of women entered the work force to take their places. In 1945, women constituted 63% of the Agency's workforce of nearly 15,000.⁵ The staggering amount of paperwork that the war generated created a backlog of un-audited vouchers. In the late 1940s, realizing that individual voucher review was overwhelming GAO's resources, Comptroller General Lindsay C. Warren began conducting comprehensive audits of the government's spending. This refocused the Agency's mission and resulted in a change in workforce composition.⁶ In 1955, women made up 39.8% of the GAO workforce; by 1966, that percentage

³ The Board is charged, by statute, with overseeing GAO's regulations, procedures, and practices relating to equal opportunity in employment. To fulfill that mandate, the Board conducts oversight studies of selected employment issues at GAO and issues reports containing its conclusions, findings, and recommendations for change to the Agency. 31 U.S.C. §732(f). *See also*, 4 C.F.R. §28.91.

⁴ *A Brief History of Women at GAO*, (1921-2008), Maarja Krusten, GAO Historian (Mar. 11, 2010).

⁵ *Id.*

⁶ *Id.* at 2.

bottomed out at the record low of 27.2%, as the professional staff was comprised of nearly all white males who came to the Agency with backgrounds in accounting.⁷

Beginning in the late 1980s, however, and continuing through the next two decades, GAO changed dramatically in terms of diversity. The biggest change of all was in the male/female ratio within the Agency's professional ranks.

GAO in 1991 and 2010

In 1991, GAO was 46% female and 54% male. Women made up 15.7% of the SES and senior level positions at GAO and 19.6% of the Band III evaluators which is the primary "feeder pool" for the SES.⁸ They were also 90% of the GS-4 through GS-7 grades, which, after Banding, were non-evaluator positions and, most likely, predominantly clerical. Although their ranks were thin at the top of the Agency, women were already making their presence felt in the Band I hiring that year, in every demographic breakdown by race and national origin.⁹

Two decades later, in 2010, GAO is 56.7% female and 43.3% male; in the past 10 years, GAO has hired significantly more women than men.¹⁰ Women not only constitute 44.9% of the SES corps at GAO but they are now the majority of Band III. In fact, in the most recent available promotion data, women made up 51% of the applicants for promotions to Band III and were 59%

⁷ Roger R. Trask, *GAO History 1921-1991*, at 80.

⁸ "Feeder pool" is a term that describes GAO employees who are eligible to apply for SES vacancies. At GAO, that means Band III analysts, specialists, and attorneys, and PT-IV and MS-II staff. The Band III analyst and analyst-related population remains the predominant feeder pool for the Executive Candidate Assessment and Development Program (ECADP).

⁹ Women were 58.6% of the Band ID hires in 1991.

¹⁰ Females constituted 56% of those hired.

of those selected for the promotions. Overall, nearly 60% of the promotions within the past 10 years have gone to women.¹¹

Women, in general, appear to have fared very well at GAO over the past two decades. However, when the gender data is disaggregated by race and national origin, women of color have not done quite as well as their white counterparts.¹² For example, in 1991, African American women were 15.7% of the workforce and 1.4% of the SES; Caucasian women were 26.3% of the workforce and 11.4% of the SES. In 2010, African American women are 13% of the workforce and 5.7% of the SES; white females are 36.5% of the GAO workforce and 33.6% of the SES. Asian males hold 3.8% of the SES/SL positions compared to 1.5% of Asian females, even though there are twice as many Asian females (161) in the GAO workforce as Asian males (80).¹³

The Effects of Downsizing in the 1990s

In the 1990s, GAO's budget was reduced by nearly 40%, necessitating a downsizing effort that, over the course of six years, reduced the Agency's workforce from approximately 5,300 in 1992 to 3,200 in 1997, where it remains in 2010. The reduction was accomplished through the use of a hiring freeze, a buyout and separation incentives program, the closure of field offices, a Reduction-in-Force (RIF), and normal attrition. Due to technological upgrades that lessened employees' needs for clerical and administrative support in a number of areas, positions in the Administrative Professional and Support Staff (APSS) ranks were reduced by 350. The

¹¹ By demographic, those 1,511 promotions were: 64% white; 20.8% black; 4.7% Hispanic; and 10.5% Asian. In addition, the 2009 appraisal cycle shows that women had higher average appraisal scores than men in GAO's Competency Based Performance System. The higher scores were at Band I through Band III.

¹² As in the rest of the Federal government, male and female Hispanics at GAO are underrepresented. The numbers are too small to draw valid comparisons between the genders.

¹³ This pattern has persisted for two decades. In 1991, there were 68 Asian men at GAO and they held three SES positions. There were 102 Asian women and they held one SES slot.

consequences were that black females under the age of 40, who predominated in the clerical positions, constituted the largest percentage of those who were subject to a RIF while older white males, who had the highest percentage of retirement-eligibles in their ranks, comprised the largest percentage taking advantage of the buyouts. Although the Agency's downsizing had a negligible effect on its overall demographic profile, the percentage of women 40 and over in the GAO workforce after the downsizing effort increased by nearly 7%.¹⁴

Occupational Parity

The Merit Systems Protection Board (MSPB) announced in a 2010 publication that women make up 46% of the civilian labor force (CLF)¹⁵ and 44% of the permanent full-time professional and administrative positions in the Federal government.¹⁶ The MSPB cautioned, however, that those figures do not mean that representation has been achieved, noting that "numerical parity between women and men within occupations tends to be the exception rather than the norm, especially in professional occupations."¹⁷

Recent data for the Executive branch show that women constitute 44.1% of the workforce; 38.3% of all of the employees in the GS 13-15 grades; and, 30.7% of the SES, which has increased from 24.4% in 2001, but is still significantly lower than GAO's percentage of 44%.¹⁸ Federally Employed Women (FEW), an organization established in 1968 to promote the

¹⁴ See, *Downsizing at the U.S. General Accounting Office*, Personnel Appeals Board (Sept. 30, 1997).

¹⁵ The civilian labor force is defined as all non-institutionalized persons 16 years old or over who are employed or unemployed and seeking work.

¹⁶ *Gender Parity in the Federal Workforce: Do You Know Where the "Goal Posts" Are?*, Issues of Merit, (MSPB), Aug. 2010, at 6.

¹⁷ *Id.*

¹⁸ *Federal Equal Opportunity Recruitment Program* (FEORP) at 36, U.S. Office of Personnel Management. Women also comprise 69.3% of the clerical ranks in the Executive branch.

advancement of women in the Federal service, has voiced its frustration over the pace at which women are participating in the senior levels of the Executive branch. According to FEW, since 2006, the percentage of women in the SES corps has grown by approximately a half a percentage point each year.¹⁹ Women in the Executive branch also lag behind men in other areas. For example, the average GS grade level for women is 9.3, which is more than half a grade below the government-wide average of 9.9 and more than a full grade below the average for men (10.4)²⁰

At GAO, women constitute nearly 57% of the workforce and, within the analyst and analyst-related ranks, the largest segment of the GAO workforce, women account for 55.4% of the population. Of that percentage, 38.2% are white, 8% are black, 5.9% are AAPI, and 2.5% are Hispanic.²¹ Factoring in the Relevant Civilian Labor Force (RCLF) for comparative purposes, black females exceed the general RCLF of 6.3% for Analyst and Analyst-Related positions; AAPI and Hispanic women also exceed the general RCLF of 6.5% and 4%, respectively, for the same positions.²²

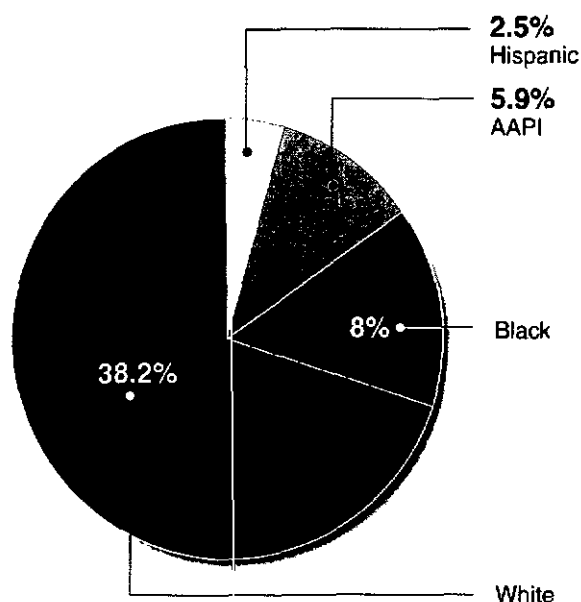
¹⁹ *Barriers to Women Working in the Federal Government*, Federally Employed Women (undated news release).

²⁰ *FY 2009 Annual Report on the Federal Work Force*, U.S. Equal Employment Opportunity Commission at I-16 (2010).

²¹ See Chart 1. 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 or Other Pacific Islander. Due to the small number of the latter at GAO, the AAPI category includes 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. This group and sub-group are known as AAPI (Asian American and Pacific Islanders). Alaskan Natives and American Indians are identified in tables in this report as AN/AI.

²² The Relevant Civilian Labor Force (RCLF) is the Civilian Labor Force (CLF) data that are directly comparable (or relevant) to the population being considered. In this instance, the RCLF for the Analyst job series (347) was taken from the *Workforce Diversity Plan* at 70, U.S. Government Accountability Office (June 2010). The RCLF is not broken down by gender and includes both men and women.

Chart 1: Women in the Analyst Corps by Race & National Origin (2010)



Source: GAO data.

The attorney ranks are split 50-50 by gender, although there is a higher percentage of men at the Band III level (53.4%) than women (46.6%). Unlike the Executive branch which still falls short of the (Civilian Labor Force) CLF mark for the participation of women overall, GAO has exceeded the CLF representation for women by approximately 10% since 2008. The first chart shows the representation of women in GAO and the Executive branch, broken down by demographic, and compares the representation in each to the CLF.²³

²³ Corresponding tables, containing the raw numbers and percentages, can be found in the Appendix to this report.

Chart 2: GAO & Executive Branch Women v. the CLF (2009)

	White	Black	Hispanic	AAPIF	AI/ANF	Overall
	Female					
GAO	36.3%	13.1%	2.3%	5.0%	0.1%	56.8%
CLF	32.4%	5.3%	5.4%	2.0%	0.3%	45.9%
Executive branch	26.6%	10.3%	3.2%	2.7%	9.0%	44.2%

Source: GAO, OPM and EEOC data.

When breaking the overall participation rates down, black women, Asian American women, and AN/Al women in the Executive branch exceeded their representation in the CLF; white women and Hispanic women fell short.²⁴ At GAO, white women, black women, and AAPI women exceeded the CLF benchmark, while Hispanic women and AI/AN women failed to meet the CLF mark.

²⁴ *Id.* at 35.

Chapter II: By the Numbers

Representation of Women by Band

Within the analyst and specialist job categories at GAO, women make up 59.6% of Band I (PDP); 53.5% of Band I;²⁵ 58.7% of Band IIA; 51.8% of Band IIB; and 52.2% of Band III.

Overall, women constitute 55.4% of the analyst and specialist corps. The following table compares the analyst population, by number and percentage, in 1991 to 2010.

Chart 3: Number & Percentage of Women in Analyst/Related Positions (1991 & 2010)

	I-D/PDP	I-F/I	II/IIA & B	III	Totals
	Band				
1991	473	473	492	90	1279
	60%	49.7%	27.6%	19.6%	35.9%
2010	251	85	770	241	1347
	59.6%	53.5%	55.5%	52.2%	55.4%

Source: GAO data.

The percentages of women in Band I-D in 1991 and Band-I (PDP) in 2010 are nearly identical. There is just a 3.8% percentage gain by women in 2010 in Band I from the Band I-F level in 1991.²⁶ In Band II, however, the percentage of women doubled between 1991 and 2010

²⁵ In 1991, Band I had two levels, developmental (I-D) and full performance (I-F). Employees were certified from the I-D to the I-F level non-competitively. Promotion from Band I to Band II was competitive. Although there is a single Band I level now, new employees spend their first two years in the Professional Development Program (PDP), rotating among teams and orienting to the GAO environment. Band II was split into two section, IIA and IIB in 2006. For comparative purposes, this report may occasionally treat Band II as a single entity, such as in Chart 3.

nd the percentage of women in Band III, the primary feeder pool for the SES, went from just under 20% to more than 50%.²⁷

In 1991, Band III included 4 Asian American women in Band III; 9 black women; 2 Hispanic women; and, 75 white women. In 2010, Band III included 13 Asian American women; 42 African American women; 6 Hispanic women; and, 180 white women. Chart 4 shows the progression of women in Band III in 1991, 2001, and 2010 by race and national origin. The chart also shows that women in each of the four demographic categories have higher participation rates in Band III in 2010 than they did in 1991.

Chart 4: Number & Percentage of Women in Band III (1991, 2001, 2010)²⁸

	White	Black	Hispanic	Asian	Band III
	Female				Percent
1991	75	9	2	4	
	16.4%	2.0%	0.4%	0.8%	19.6%
2001	111	13	1	6	
	26.9%	3.1%	0.02%	1.5%	31.5%
2010	180	42	6	13	
	39.0%	9.1%	1.3%	2.8%	52.2%

Source: GAO data.

The predominance of women in Band III certainly accounts for the gender diversity in the SES at GAO. Looking further into the path to that corps, there were 91 internal promotions to the SES in the past 10 years. Women, overall, garnered 35 of them (38.5%), with white women getting 27 of the promotions (29.7%). Five African American women (5.5%) were promoted to

²⁷ Women were just 5% of Band III in 1985.

²⁸ For a full breakdown of Bands I and II by number and percentage, see Tables 3a through 3d in the Appendix to this report.

the SES through the internal process, along with one Asian woman (1.1%) and two Hispanic women (2.2%).

The Administrative Professional and Support Staff Community

In 2004, the Agency switched its APSS staff from the General Schedule to a banded pay system. The employees are now grouped into either an Administrative/Clerical (AC) band, Professional/Technical (PT) band or the Managerial and Supervisory (MS) band.²⁹ Both plans have four pay bands that allow for salary progression within a pay band without competition. The AC band is generally equivalent to the GS-3 through GS-12 grades; the PT band covers the general equivalent of GS-7 through GS-15. Staff within the AC bands can apply for positions in the PT plan and the Agency reports that 22 AC employees have been promoted to the PT ranks since banding. Most of the PT positions require a college degree. PT-I employees also participate in the two year Professional and Technical Development Program which is a developmental period combining orientation, training, rotation among job experiences, and one-on-one employee support. In 2010, women are 68% of the employees participating in the Professional and Technical Development Program.

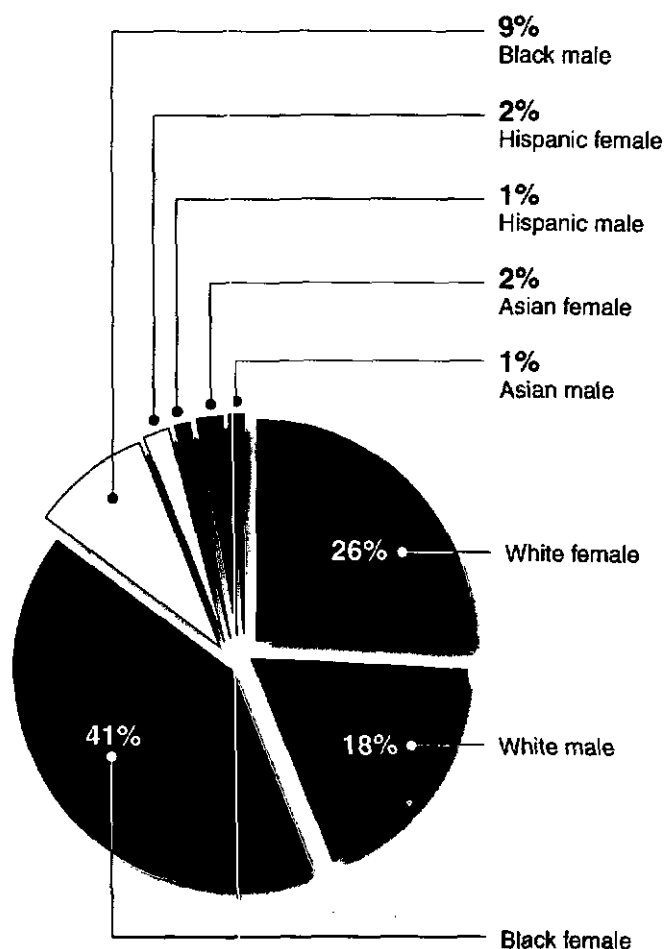
Since the advent of banding in the APSS corps, 43 employees in the AC pay plan have moved beyond AC-II, which is the GS-9 equivalent.

At the end of the first calendar quarter of 2010, there were 537 employees (16.6% of GAO) in the APSS corps, although only 162, 5% of the GAO workforce, are in strictly

²⁹ APSS positions are assigned to job families which are: Information Technology Management; Human Capital; Budget, Accounting, Property, and Contracting; Analyst/Information Specialists; Communication and Media; Operational Services; Administrative; Wage System; and, Managerial and Supervisory. The AC band covers positions in the Administrative job family; the MS band covers positions in the Managerial and Supervisory job family; and, the PT band covers the positions in the remaining job families. *Performance Job Families and Pay Band Structures for Administrative Professional and Support Staff*, GAO Order 2511.3, ch. 2 ¶4; ch. 3 ¶3 (Aug. 2005).

administrative/clerical positions.³⁰ Black women hold 53.4% of those positions; employees who are 40 or over make up 81.6% of the clerical support positions. Within the APSS population, in general, 378 (70.4%) are female. The following chart breaks down the numbers and percentages, demographically.

Chart 5: APSS by Gender, Race and National Origin (2010)



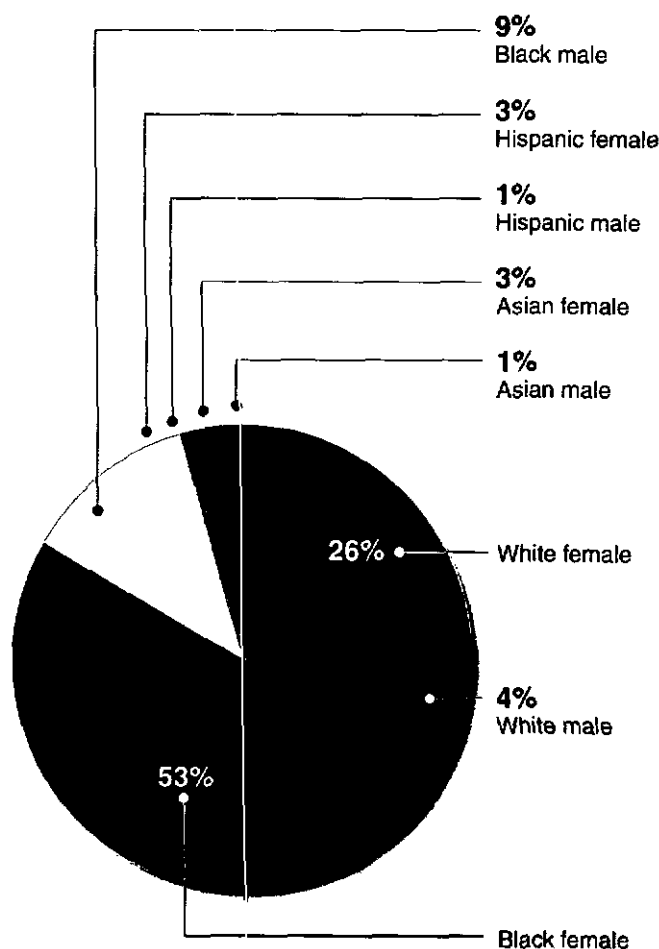
Source: GAO data.

Women outnumber men by more than two to one in the APSS population; women of color comprise 44% of the APSS corps, overall.³¹ Within the APSS bands, white females make up 25.5

³⁰ In 1985, 16% of the GAO workforce held administrative/clerical positions; many of those were rendered obsolete by technological advances.

% of the PT-I band (Professional and Technical Specialists) and 21.4% of the PT-IV band; African American females are 42.6% of the PT-I band. There are no African Americans at the PT-IV level.³² The following two charts show the demographic breakdown, by gender, race and national origin, of the AC band (Administrative) and the PT band (Program and Technical Specialist).

Chart 6: AC Band by Gender, Race, and National Origin (2010)³³



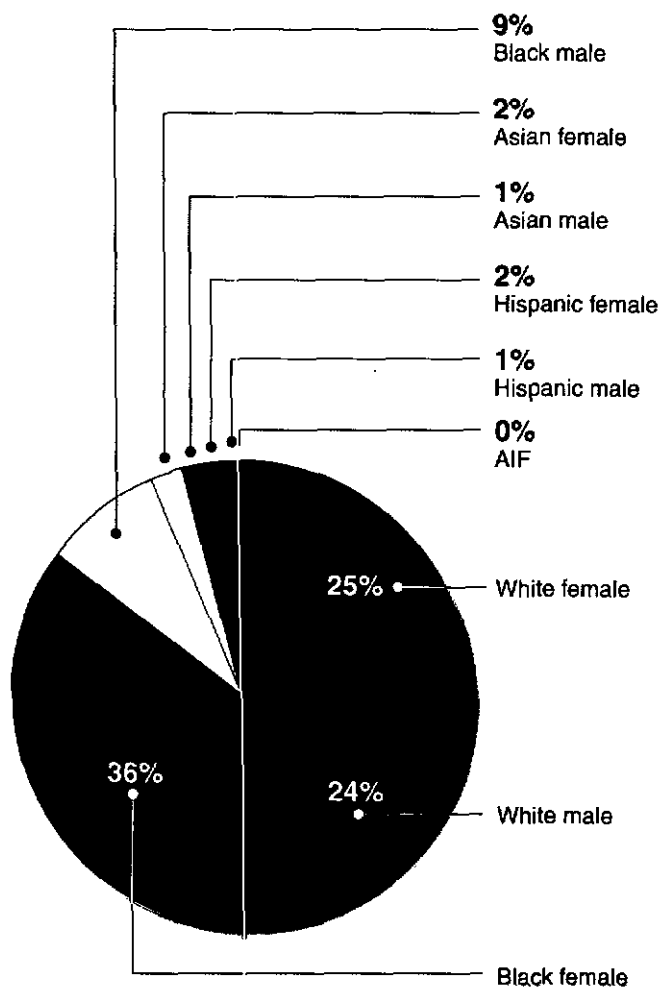
Source: GAO data.

³¹ The Agency's profile in 1991, long before APSS was formed, shows that black females held 66% of the GS-4 through GS-7 positions, a range which encompassed many, if not most, of the clerical staff. The term "women of color" includes any women who are not Caucasian.

³² PT-I is generally equivalent to grades GS 7-11; PT-IV is the GS-15 equivalent. The PT-IV population is very small in number (12 as of September 30, 2010) as it is reserved for staff with unique technical expertise and knowledge.

³³ As of September 30, 2010, there is one AC-III employee identifying as AN/AI (.03%).

Chart 7: PT Band by Gender, Race, and National Origin (2010)



Source: GAO data.

There are 139 women in the AC band. The AC-II has 79 women and 13 men and is the largest within the AC Band. There are no Asian or Hispanic women at the AC-IV level. There are 206 women in the PT band. Similarly, the PT-II Band is the largest with 104 women and 52 men.

APSS Managerial/Supervisory Breakdown

The APSS supervisory ranks are called the Managerial and Supervisory Performance Job Family (MS) and those holding MS positions are responsible for supervising multiple staff and

managing significant budget, staffing and contractual resources.³⁴ Within the MS ranks, white females and black females are only 3 percentage points apart at MS-I, the first level (33.3% v. 30%) but at the higher level of the MS-II Band, white females make up 30% and black females, 10%.³⁵ There are no Asian or Hispanic women at the MS-II level.³⁶ Men hold 57% of the MS-II positions (white/47%; black/10%), which are part of the feeder pool for eligibility to apply for SES opportunities.³⁷ During the past six years, there have been 10 employees promoted to MS-II positions, six of whom were female; there were four promotions to PT-IV, one of whom was female.

PT-IV Breakdown

In 2010, there are nine men and three women at the PT-IV level, which is also a part of the feeder pool for SES eligibility.³⁸ There are 83 women and 43 men who are MS-I or PT-III employees, eligible for MS-II or PT-IV placement, both of which are GS-15 equivalents. Of the 83 females, 40 are white, 35 are black, 6 are Asian and 2 are Hispanic.

There are 42 employees at the MS-II and PT-IV levels, both of which are GS-15 equivalent, who are eligible to apply for SES positions. Of the 42, 16 are women; 12 are white, 3 are black, and 1 is Hispanic. Of the 26 men who are eligible, 22 are white. There are currently 12 positions at PT-IV and 30 at MS-II. The next chart shows the pipeline of those eligible for

³⁴ GAO Order 2511.3, ch. 2 ¶4g. MS staff is found in IT Management; Human Capital; Budget, Accounting, Property, and Contracting; Information Specialists; Communication and Media; and, Operational Services.

³⁵ MS-I corresponds, roughly, to the GS-13/14 grades and MS-II corresponds to the GS-15 grade.

³⁶ There are no Asian or Hispanic men at the MS-II level.

³⁷ In 2004, when the banded APSS corps was created, men were 63.3% of MS-II (89% white/11% black).

³⁸ There were 14 PT-IV employees in 2004, seven men and seven women. Nine of the 14 were white; 3 were African American; and, two were Hispanic.

leadership positions in the APSS community; the following chart shows the demographic breakdown of the current top tier of employees in the APSS ranks.

Chart 8: MS-I and PT-III Staff (2010)

	White	Black	AAPI	Hispanic	Total
Female	40 31.8%	0 0%	6 4.8%	2 1.6%	83 65.9%
Male	29 23.0%	0 0%	3 2.4%	2 1.6%	43 34.1%

Source: GAO data.

Chart 9: MS-II and PT-IV Staff (2010)

	White	Black	AAPI	Hispanic	AI/AN	Total
Female	12 28.6%	0 0%	0 0%	1 2.4%	0 0%	16 42.8%
Male	22 52.4%	0 0%	0 0%	1 2.4%	0 0%	26 57.2%

Source: GAO data.

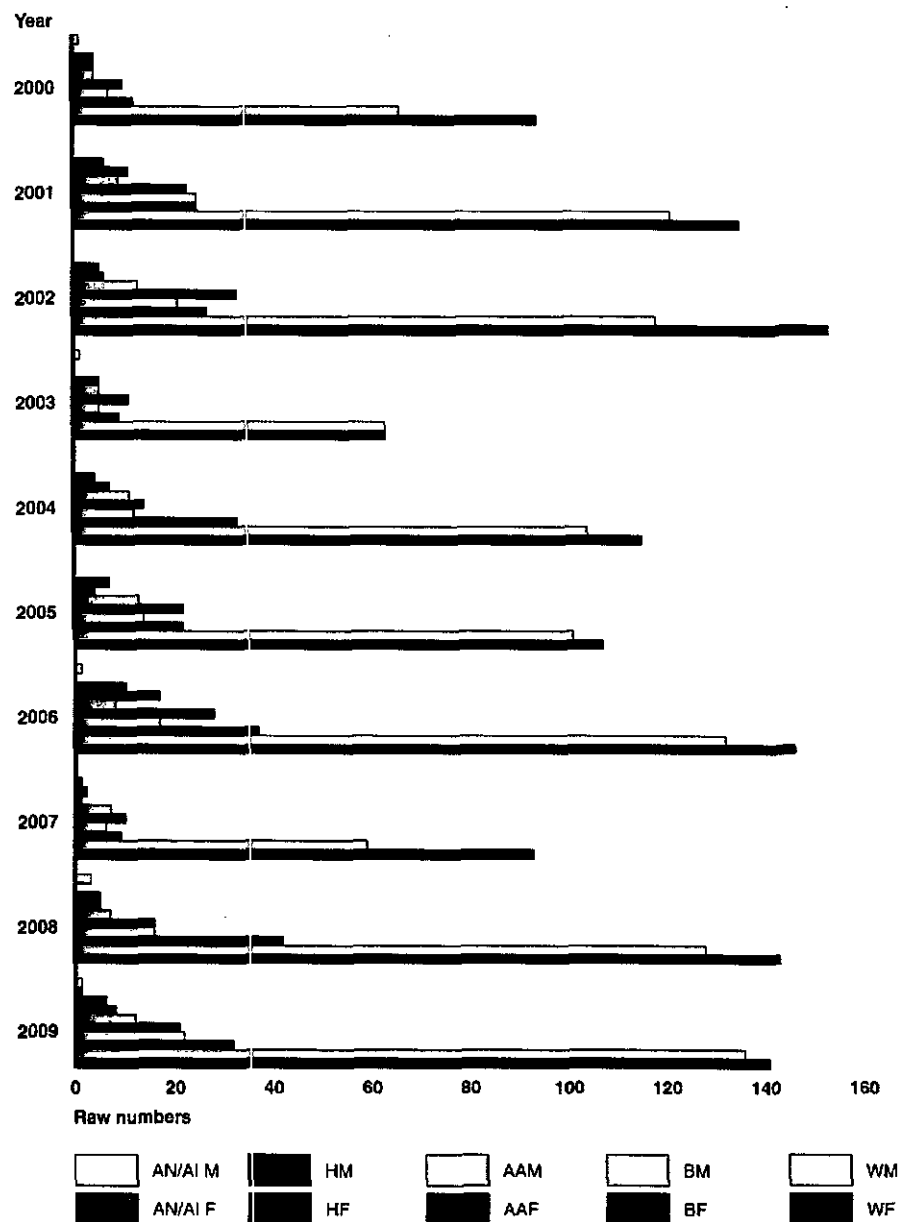
The percentage of black females in the pipeline for top positions in the APSS ranks is 27.7% but they currently hold just 7% of the positions in the leadership ranks. The percentage of white females in the pipeline is not significantly different from the percentage in PT-IV and MS-II positions (31% v. 28%). When the percentage of white males is combined with the percentage of white females in the PT-IV and MS-II positions, it becomes apparent that 81% of the APSS leadership is white.

Non-Intern Hires (2000-2009)

In the past 10 years, GAO has hired 3,019 new employees, 56.3% of whom were

female.³⁹ The following chart shows the numbers, by demographic category, for those new hires.⁴⁰

Chart 10: Non-Intern Hires (2000-2009)



Source: GAO.

³⁹ During the same time period, GAO hired 1,538 interns; 56.9% of them were female.

⁴⁰ Six employees identified themselves as “multiple” in the racial category. They are not reflected in Table 3 in the Appendix or Chart 9. The legends stand for Alaskan Native/American Indian, Hispanic, Asian American, black and white, all broken down by gender (F) and (M).

Of the new hires, 34 were in the AC band (23 females or 67.6%); 80 were attorneys (43 females or 53.7%); 2,530 were analysts (1,441 females or 57%); and 49 were in the SES (16 females or 32.6%).⁴¹ In addition, there were 6 women hired at the MS-II level and 8 men.⁴²

Non-SES Promotions (2000-2009)

There were 2,449 promotions at GAO from 2000 through 2009 and female employees received 61.7% of them. Women started out strongly in the new millennium, garnering 67% and 68% of all the promotions at the Agency in 2000 and 2001, respectively. Except for a dip to 56% in 2005, promotions of women at GAO remained fairly steady in the lower 60-63% range throughout the decade.

Of the attorneys at the Agency who were promoted during the past decade, 59% were women and 41% were men. The analyst corps had almost the same percentages as the attorneys: 58.9% female and 41.1% male. Promotions to Band III over the span of the 10 years were much closer (51.2% female v. 48.8% male).

Early in 2006, the Agency completed its restructuring of Band II, splitting the analysts into two groups, Band IIA and Band IIB. The chief differences between the two were that Band IIB employees were to have full responsibility for planning and carrying out projects and assignments and were expected to lead engagements,⁴³ including those designated as high-risk.⁴⁴ The Agency created a one-time process to determine who would be placed in either Band IIA or Band IIB and

⁴¹ During the same time period, there were three Senior Level (SL) hires, one of whom was female and five SR hires, one of whom was female. Both pay plans are SES equivalents.

⁴² Two males, one white and one black, were hired at the MS-II level in the first quarter of 2010.

⁴³ The other difference, of course, is in the pay rates. In 2010, the gap between the Band IIA cap and the Band IIB cap was nearly \$31,000.

⁴⁴ A risk factor—low, medium, or high—is assigned to an engagement that will, among other things, determine the level of product review and executive-level involvement throughout the engagement. Factors such as the costs, complexity, or potential controversy of the work and related potential access to records concerns are considered in the risk determination. *GAO Policy Manual* at 53 (Jan. 2008).

set minimum eligibility requirements. Although there were panels established to review the candidates' backgrounds and recommend them for Band II placement, the decisions were ultimately rendered by the Chief Administrative Officer (CAO) and the Chief Operating Officer (COO). An employee could request reconsideration of a placement decision by the Comptroller General (CG).⁴⁵

At the end of the process, 453 employees were placed in Band IIB, with a virtually even breakdown between women (227) and men (226). The demographics behind the split are displayed in Table 8.⁴⁶

Table 10: Initial Band IIB Placements (2006)

	White		Black		Asian		Hispanic		Total
	Female	Male	Female	Male	Female	Male	Female	Male	
Number	167	185	29	17	23	8	8	16	453
Percent	36.9%	40.8%	6.4%	3.7%	5.1%	1.8%	1.8%	3.5%	100%
Percent of GAO	34.9%	34.4%	13.2%	5.3%	5.1%	2.4%	2.4%	2.3%	100%

Source: GAO data.

The 2010 figures for Band IIB, after four years of non-competitive placements, are remarkably similar to the 2006 data, with the exception of Asian females, who currently are 5% of the GAO workforce and make up 6.7% of Band IIB, up from 5.1% in 2006. Hispanic females constitute 2.3% of the Agency and remain 1.8% of Band IIB; African American females make up 13.1% of the workforce and, in 2010, hold 6.3% of the Band IIB positions.

⁴⁵ *Band II Restructuring*, GAO Order 2900.3 (Nov. 4, 2005). This Order was cancelled as obsolete on August 23, 2010 and is no longer available.

⁴⁶ The applicant data for the initial Band II-B positions show percentages within one percentage point of the selectees except for African Americans who were 12% of the applicants and 9% of those selected.

Within the APSS corps, the Agency reported in its latest Workforce Diversity Plan that African American women who comprise 53.4% of the AC positions received about 83% of the promotions; Asian American women who fill 3.1% of the AC positions received 17% of the promotions. Accordingly, both African American women and Asian American women were promoted at rates that exceeded their participation in AC positions.

In the PT pay plan, women represented about 65 percent of the total staff and about 90 percent of those promoted. African American women hold 36.2% of the PT positions and garnered 43% of the promotions; white women comprise 25.2% of the PT ranks and received 38% of the promotions; and, Asian women hold 2.2% of the positions in the PT ranks but received 10% of the promotions. All of them exceeded their participation in PT positions.⁴⁷

In addition, during the last decade, there have been 47 administrative (AC) employees promoted or converted to analyst or other professional positions. Forty-three of them were female; 34 were black (72.4%); 12 were white (25.5%); and, 1 was Hispanic.

⁴⁷ *Workforce Diversity Plan* at 23, 77 (June 2010).

Chapter III: Programs

Career Progression and Benefit Programs

Over the years, GAO has established programs intended to transition staff from clerical or administrative positions to the professional ranks. Because women predominate in the clerical and administrative job series, these programs have been, and are, relevant to their career progression at the Agency.

In 1974, GAO established an Upward Mobility Program to provide employees in lower level clerical and administrative positions with training, educational opportunities, and developmental experiences to move into professional positions, such as evaluators (analysts).⁴⁸ Entry into the program was competitive and the selection process was administered in a manner consistent with the merit promotion system.⁴⁹ Approximately 130 GAO employees participated in the program in the 1970s, another 60 joined in the 1980s. Nearly three-quarters of the program's graduates migrated into the evaluator ranks. In 2010, there are 21 graduates of the Upward Mobility Program still working at GAO, including eight who are in the SES or Band III.

In 1986, GAO turned to an external personnel consultant to assess the program. While the resultant report found that the program was structurally sound, it also identified a number of problems, including negative internal and external perceptions of the program and its participants. The consultant noted, for example, that the program was difficult and led to increased stress for the participants; that staff who dropped out described themselves as visible failures; and, that some managers and evaluator staff believed that participants were not qualified for evaluator positions.

⁴⁸ Other positions available to program participants included Management Analyst, Budget Administration Assistant, Personnel Assistant, Computer Technician, and Editorial Assistant. *GAO Career Planning Guide* at 76-77 (Feb. 1977).

⁴⁹ *Id.*

In addition, the consultant noted that GAO had a culture that made a sharp distinction between clerical and professional staff, creating an “enormous gulf” for participants in the Upward Mobility Program. The report urged the Agency to seek ways for support staff to take advantage of opportunities that could lead to increasingly satisfactory careers. With the percentage of women at GAO steadily increasing, as was the percentage being hired directly into professional positions, GAO made the decision to discontinue the program.⁵⁰

Coterminous with the Upward Mobility Program, in 1980, the Agency implemented an “inter-career development agreement” (ICDA) program which listed, among its goals, to “serve as a medium for qualification for permanent reassignment or promotion, following successful completion of training, in the same or other series than ones in which employees are presently assigned.”⁵¹ The ICDA program, aimed at those graded at the GS-5 level or above, operates through the use of details or reassignments of six months to three years to other divisions and offices. Upon completion of the ICDA, an employee may be reassigned or promoted.⁵² According to GAO management, the program, extant in 2010, has provided career change opportunities for staff in a number of different positions and was used extensively in 2002 when GAO centralized all of its mission support functions.

Another developmental initiative that gave staff opportunities to perform at higher levels was the reclassification of positions in the mission support area that the Agency undertook in the 1990s. During that time period, the Agency reclassified positions in the areas of legal services,

⁵⁰ The Agency provided the information about the Upward Mobility program but noted that the information about it may be incomplete as the program is older than GAO’s seven year document retention policy. *GAO Records Information and Disposition Schedule*, Schedule 1: Administrative Schedule (Oct. 1, 2007).

⁵¹ GAO Order 0832.1, *Inter-Career Development Agreement (ICDA)*, ¶3(d) (July 1, 1980) (superseded by GAO Order 2335.7 (Jan. 23, 1998)).

⁵² *Id.* ¶6. In order to be promoted, employees still had to meet time-in-grade requirements and have the appropriate qualifications.

information technology, financial management, and procurement, creating positions with greater promotion potential. Under a hundred staff who had previously occupied clerical positions moved into the reclassified positions; 90% of them were women.

The Agency also has a mentoring program that is open to analysts from PDP through the SES and to APSS employees in all three Bands and the SES.⁵³ GAO offers both one-on-one and group mentoring, as well as Facilitated Career Discussions. Mentors focus on providing broad career guidance over a six month time period in a confidential setting.

Benefit Programs

GAO offers flexibility programs such as alternative work schedules and telework, as well as making part-time schedules available which is a big draw for women at the Agency.⁵⁴ More than 300 employees at any given time are working part-time schedules; 90% of them are women. Part-time employment can be requested at any time from one's unit head but the impetus for the request must come from the employee. Part-time employees are required to work between 16 and 32 hours per week and are eligible to participate in the maxiflex and teleworking programs. Part-time employees pay a higher share of health insurance premiums and their annuities are computed differently at retirement.

GAO was in the forefront of Federal agencies in making childcare available to its employees. As early as 1981, employees were indicating their support for a full-time day care

⁵³ There are unit-wide mentoring programs in existence within the APSS community. APSS employees may participate in the Agency-wide program in addition to or instead of their unit programs.

⁵⁴ The Part Time Career Employment Opportunities Act does not apply to GAO. 5 U.S.C. §3401. That Act requires covered agencies to set annual goals to establish or convert positions for part-time career employment. 5 U.S.C. §3402(a)(1)(C). The Board has previously recommended that the Agency designate specific vacancies as part-time but the Agency has declined to do so. *See, The State of Equal Employment Opportunity at GAO in the 21st Century* at 45-46, Personnel Appeals Board (Oct. 2005) Available at www.pab.gao.gov.

facility at the Headquarters building.⁵⁵ The Agency's on-site day care center, Tiny Findings, opened in 1990 at GAO in the Headquarters building. It accepts children between the ages of three months and five years and makes tuition assistance available, based on income. Tiny Findings was one of the first Federal child care centers to receive accreditation from the National Association for the Education of Young Children.⁵⁶

⁵⁵ *Management News* at 3, Vol. 30, No. 10 (Dec. 2002).

⁵⁶ *Id.* at 3. Vol. 29, No. 33 (May 2002).

Chapter IV: Conclusions and Recommendations

The progress of women at GAO, in general, has been strong and steady over the past two decades and their gains are reflected across the workforce and in the highest echelons of Agency management. At every level and by nearly every yardstick, GAO's percentages with respect to gender outstrip the Executive branch; the remarkable success of women at the Agency came about through focus and commitment that should be applauded.

A good deal of GAO's appeal to recruits, in general, and to women, in particular, has to derive from the myriad benefits it offers, including those that allow staff to develop and maintain a balance between work and personal life. GAO has found itself frequently in the forefront of Federal agencies when it comes to innovative initiatives, particularly in the area of alternative work arrangements where the Agency has established programs that have flourished and remain integral parts of GAO today.

To a greater extent than some of its Executive branch counterparts, GAO's pool of applicants is defined by the Agency's high educational requirements. The Agency recruits and hires mostly for positions that require, at a minimum, a bachelor's degree; its workforce has less than a half-dozen wage grade employees. According to recent education statistics, the percentage of Bachelor's, Master's, and Doctoral degrees conferred to women exceeds the percentage conferred to men in each of the four major demographic groups (white, black, AAPI and Hispanic).⁵⁷ Currently, 60% of the Agency's workforce holds master's degree or higher.

It is axiomatic that seeing people succeed who share a common background, ancestry, gender or race with new or lower level employees can lead those employees to believe that

⁵⁷ *Condition of Education 2010*, Indicator 23, U.S. Department of Education, National Center for Education Statistics (2010).

opportunities and paths to success are also open to them. The presence of so many women in high profile positions at the Agency may be a reason that women are choosing to work at GAO and remain at the Agency.⁵⁸

This is apparent mobility in the APSS community that affords employees in the Administrative Band the opportunity to move into the PT Band which has the greater promotion potential. The Board observed that, among the 47 AC employees who were promoted or converted to analyst or other professional positions, during the past decade, 43 of them were female.

The one area that caused the Board concern in this study is the composition of the upper levels of the APSS community, the PT-IV and MS-II positions,⁵⁹ both of which confer eligibility for the SES even though the PT-IV is a technical, non-supervisory post. Women in the APSS staff in the AC-I through AC-III and PT-I through PT-III Bands outnumber men by nearly a 3 to 1 ratio yet in the PT-IV and MS-II ranks, combined, men hold 57% of the positions. Although there has been progress in the MS-II ranks, the PT-IV positions are occupied by nine men and only three women even though women comprise 65.6% of that Band. While gender is the focus of this study, the Board notes that 81% of the PT-IV and MS-II leadership in the APSS community is white, which certainly does not reflect the diversity within the ranks.

The Board recognizes that the Agency has made strides in diversifying the pipeline that leads to PT-IV and MS-II positions and also notes that vacancies do not appear to occur at that level very often.⁶⁰ Because of those factors, the Board recommends the following;

⁵⁸ *Grutter v. Bollinger*, 539 U.S. 306, 333 (S. Ct. 2003).

⁵⁹ See note 33, *infra*.

⁶⁰ In the last promotion cycle, which spanned October 1, 2009 to March 31, 2010, there were not any promotions to either PT-IV or MS-II. There have been four promotions to PT-IV since 2004; the last one was in 2007. There have been 10 promotions to the MS-II level since 2004 but only one in 2009 and none in 2008.

The Agency is to be commended for its very successful efforts to promote gender diversity at all levels at GAO, particularly in the managerial and supervisory ranks. The Board hopes that vigilance will ensure that the participation rates for women will continue to be robust.

The Agency is urged to remain cognizant of the disproportionate gender and racial differences that exist between the APSS corps and its leadership and take into consideration such disproportionate differences as vacancies occur.

Appendix I: Tables & Comments from GAO

Table 1: GAO & Executive Branch Women v. the CLF (2009)

	W	B	I	A&P	A&N	OVERALL
GAO	36.3%	13.1%	2.3%	5%	.1%	56.8%
CLF	32.4%	5.3%	5.4%	2%	.3%	45.9%
Executive Branch	26.6%	10.3%	3.2%	2.7%	.9%	44.2%

Source: GAO, OPM & EEOC data

Table 2: Number & Percentage of Women in Analyst/Related Positions (1991 & 2010)

	1991	2010	1991	2010	1991	2010
1991	224	473	492	90	1279	
	60%	49.7%	27.6%	19.6%	35.9%	
2010	251	85	770	241	1347	
	59.6%	53.5%	55.5%	52.2%	55.4%	

Source: GAO Data

Table 3: Number & Percentage of Women in Band III (1991, 2001, 2010)

	W	B	I	A	% of BAND III
1991	75	9	2	4	
	16.4%	2%	.4%	.8%	19.6%
2001	111	13	1	6	
	26.9%	3.1%	.02%	1.5%	31.5%
2010	180	42	6	13	
	39%	9.1%	1.3%	2.8%	52.2%

Source: GAO data

Table 3a: Number & Percentage of Women in Bands I-D/PDP (1991 & 2009)

	W F	B F	I F	A F	% of BAND D PDP
1991	148	36	17	30	
	38.8%	9.5%	4.4%	7.9%	60.6%
2009	152	25	9	21	
	42.3%	6.9%	2.5%	5.8%	57.5%

Source: GAO data

Table 3b: Number & Percentage of Women in Bands I-F/I (1991 & 2009)

	W F	B F	I F	A F	% of BAND D PDP
1991	326	95	25	21	
	34.5%	10%	2.6%	2.2%	49.3%
2009	94	19	15	19	
	39%	7.8%	6.2%	7.8%	60.8%

Source: GAO data

Table 3c: Number & Percentage of Women in Bands II/IIA & IIB (1991 & 2009)

	W F	B F	I F	A F	% of BAND D PDP
1991	351	106	15	21	
	19.6%	5.9%	.8%	1.2%	27.5%
2009	486	112	32	83	
	37.6%	8.7%	2.5%	6.4%	55.2%

Source: GAO data

Table 3d: Number & Percentage of Women in Band III (1991 & 2010)

	White	Black	Hispanic	Asian	% of Band III
1991	75	9	2	4	
	16.4%	2%	.4%	.8%	19.6%
2010	180	42	6	13	
	39%	9.1%	1.3%	2.8%	52.2%

Source: GAO data

Table 4: The APSS Corps by Gender, Race and National Origin

2010	White	Black	Hispanic	Asian	AAAN	Other
Females	140	214	9	13	2	378
	37%	56.6%	2.4%	3.4%	.6%	100%
Males	97	49	7	6	0	159
	61%	30.8%	4.4%	3.8%	0%	100%
Totals	237	263	16	19	2	537
	44.1%	49%	3%	3.5%	.4%	100%

Source: GAO data

Table 5: AC Band by Gender, Race, and National Origin

	White	Black	Hispanic	Asian	AAAN	Other	Other
%	26.3%	3.7%	53.4%	9.2%	3.1%	.6%	2.5%

Source: GAO data

Table 6: PT Band by Gender, Race, and National Origin

	White	Black	Hispanic	Asian	Other	Hispanic	Asian	Other	Hispanic
%	25.2%	23.9%	36.2%	8.5%	2.2%	1.3%	1.6%	.9%	.2%

Source: GAO data

Table 7: MS-I and PT-III Staff (2010)

	White	Black	AAPI	Hispanic	Total
F	40	35	6	2	83
	31.8%	27.7%	4.8%	1.6%	65.9%
M	29	9	3	2	43
	23%	7.1%	2.4%	1.6%	34.1%

Source: GAO data

Table 8: MS-II and PT-IV Staff (2010)

	White	Black	AAPI	Hispanic	Other	Total
F	12	3		1		16
	28.6%	7%		2.4%		42.8%
M	22	3		1		26
	52.4%	7%		2.4%		57.2%

Source: GAO data

Table 9: Non-Intern Hires by Race, National Origin & Gender (2000-2009)

	WT	WW	BI	BM	AA	AAW	HI	HM	SP	SPW	TOTAL
2000	94	66	12	7	10	4	4	4		1	202
2001	135	121	25	25	23	9	11	6			355
2002	153	118	27	21	33	13	6	5			376
2003	63	63	9	5	11	5	5			1	162
2004	115	104	33	12	14	11	7	4			300
2005	107	101	22	14	22	13	4	7			290
2006	146	132	37	17	28	8	17	10		1	396
2007	93	59	9	6	10	7	1	2	1		188
2008	143	128	42	16	16	7	5	5		3	365
2009	141	136	32	22	21	12	8	6	1		379
Totals	1190	1028	248	145	188	89	68	49	2	6	3013
%	39.5%	34.1%	8.2%	4.8%	6.2%	2.9%	2.2%	2%	.07%	.2%	100%

Source: GAO data

Table 10: Initial Band IIB Placements (2006)

	WT	WW	BI	BM	AA	AAW	HI	HM	TOTAL
#	167	185	29	17	23	8	8	16	453
%	36.9%	40.8%	6.4%	3.7%	5.1%	1.8%	1.8%	3.5%	100%
% at GAO	36.4%	33%	13.1%	5%	5%	2.5%	2.3%	2.3%	

Source: GAO data



United States Government Accountability Office
Washington, DC 20548

November 15, 2010

M. Gail Gerebenics
Director, EEO Oversight
Personnel Appeals Board
Washington, DC 20548

Dear Ms. Gerebenics:

We appreciate the opportunity to comment on a draft of the PAB's report, *Women in the GAO Workforce*. As the report notes, women have made tremendous strides in moving from predominantly clerical positions to professional positions (e.g., analysts, attorneys, contract specialists, information technology specialists, etc.) at the agency over the last 25 years. We appreciate the recognition for the results of our efforts to promote gender diversity at all levels in GAO. Regarding the Board's findings and conclusion, we plan to monitor the representation of women in the senior administrative, professional, and support staff (APSS) ranks, as recommended.

Based on recent data, we expect that representation of women in senior APSS positions will increase, but may take longer than it has for our analyst staff due largely to the small number of such positions. Regarding the PT-IV position, GAO created this unique and distinct level with the expectation that it would be used to a very limited extent—as of October 2010, we had only 14 PT-IVs. Such positions are reserved for employees with unique and highly specialized knowledge and skills. For example, we have a PT-IV statistician with more than 20 years of workforce analysis expertise—expertise that has enabled us to perform sophisticated workforce planning and analysis that is recognized as a model in federal agencies. While 44 percent of all PT-IV hires over the requested time period were women, they comprised 71 percent of the more recent hires—those made during 2007 through 2009. In addition, 78 percent of PT-III positions—a key pipeline for PT-IV positions—are held by women (as of October 2010). Prospects are even more promising for enhancing gender diversity at the MS-II level. Sixty percent of promotions to MS-II during the time period went to women, and women represented 70 percent of those promoted to MS-I positions—a key pipeline for MS-II positions. As your draft report notes, vacancies at the MS-I and MS-II levels do not occur frequently and, given the small number of PT-IV positions, changes in the demographic composition of this group will likely take longer than we have seen in the analyst ranks. We are confident that we have the on-board talent and development programs in place to provide a sufficient pipeline of potential women for senior APSS positions.

We have provided technical clarifications and editorial comments and suggestions for your consideration in a separate document. For example, in places where small populations are discussed, we suggest using actual numbers rather than or in addition to percentages. Also, we plan to address your question about the use of the term "multiple" in designating one's race and national origin in a separate correspondence.

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.

Sincerely yours,

A handwritten signature in cursive script, reading "Cheryl Whitaker". The signature is written in dark ink and is positioned above the printed name and title.

Cheryl Whitaker
Acting Chief Administrative Officer

Enclosure

