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Guidelines
for
Agency Internal Evaluation of
Equal Employment Opportunity
Programs

Personnel Management Series No. 24

Contents

I. Introduction

PUBLIC EMPLOYERS HAVE A CLEAR MANDATE to develop specific policies and programs which will assure equal employment opportunity (EEO) for all employees and applicants for employment. Outlined below are the elements which constitute a comprehensive program of equal employment opportunity. These elements are based on the specific requirements of Executive Order 11478 and the Equal Employment Opportunity Act of 1972 (which amended the Civil Rights Act of 1964), and are elaborated on in Commission instructions to agencies on the development and submission of equal employment opportunity plans.

—Adequate and competent staff and dollar resources throughout the organization to assure administration and implementation of a results-oriented program of equal employment opportunity which is involved in every aspect of personnel management policy and practice.

—Recruitment activities designed to reach and attract job candidates from all segments of the population. Where appropriate, these activities are tailored to improve their effectiveness among members of specific groups.

—Full identification and utilization of the present skills of employees on the rolls, facilitating movement through job restructuring techniques, establishment of trainee positions, and assuring that qualifications requirements are realistic in terms of the jobs to be done.

—Opportunities for employees to enhance their skills, perform at their highest potential, and advance in accordance with their abilities and the availability of opportunities. These efforts include programs of career counseling and planning, training and education, job analysis and redesign, and elimination of any unnecessary barriers to upward mobility,

—Encouragement of EEO program understanding and support by supervisors and managers through practical training and advice, effective use of incentive systems, and evaluating supervisory and managerial performance in the EEO area.

—Managerial support for and participation in community efforts to improve conditions—such as housing, transportation, and education—which affect employability.

—Systematic evaluation of EEO program progress, identification of problem areas, and assessment of the effectiveness of program activities.

—Systems providing for the informal resolution of EEO-related employment problems wherever possible, and for prompt, fair, and impartial consideration of formal complaints of discrimination in any aspect of employment.

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—Special programs to provide employment and training opportunities for the economically and educationally disadvantaged.

These program elements are essential to equal employment opportunity programs in all agencies. In addition, affirmative action from the Civil Service Commission's EEO program management standpoint includes a continuing review of all employment procedures, tests, and other selection devices to assure that they are job-related and to eliminate any artificial or unnecessary barriers to the employment and advancement of members of any groups, and to promote equal opportunity for all persons to compete on the basis of merit.

This pamphlet contains basic guidelines for internal evaluation of equal employment opportunity programs. The guidelines are written for a wide and varied audience. Hence, it is not expected that every agency will adopt every suggested approach or procedure found in the booklet. However, each agency should have some system for periodically reviewing its EEO policies and programs so that each organization can determine its effectiveness in achieving its EEO goals and objectives.

II. Evaluation Objectives

The major objectives of EEO evaluation are:

—To assess the effectiveness of management in identifying the factors and problems bearing on equal employment opportunity,

—To review the implementation of action plans to meet and overcome obstacles to full equality of opportunity,

—To provide agency management with recommendations or directions for remedial action,

—To assure that action has been taken on recommendations and directions.

III. Approaches to EEO Evaluation

Results-Orientation

Equal employment opportunity evaluation should be directed at more than the elimination of the practices and patterns of discrimination. That is, the evaluation of an organization should ensure that significant and vigorous steps are being taken to put an affirmative action program into effect and that this program is real and not an expression of pious intentions. The evaluation process should analyze the planning that has been done in support of affirmative action and determine whether these plans are imaginative, realistic, and comprehensive. Are the resources committed to make the plans work? Have the actions to which the agency is committed been taken? In other words, evaluations should be action oriented and realistically aimed at measuring the results of these actions.

Problem Solution in a Consultative Environment

Self-evaluation systems often strive to identify operating problems and program deficiencies which exist within the agency and then direct these problems and deficiencies to management for resolution. To be fully successful, self-evaluation systems should aim at bringing about the greatest possible involvement of supervisors and program managers in the evaluation process. This may be achieved best in a consultative environment, i.e., evaluators, supervisors, and program managers jointly diagnosing problems and proposing solutions. Ideally, evaluators, supervisors, and program managers will all be full-time members of the evaluation team and will participate in all phases of the evaluation. However, if affected supervisors and program managers cannot be full-time working participants, they should at least be consulted throughout the evaluation process. Supervisory and managerial participation in the identification of problems and in the preparation of action plans leading to the solution of those problems ensures that the evaluation is realistic and that the findings will be implemented.

Motivation for Improvement and Organizational Change

Evaluation should be aimed at bringing about organizational change where needed. It should be aimed at making improvements rather than just producing reports. Therefore, after pursuing problem causes and aiding management in developing a plan of action for solving those problems, the evaluator should assure that there is agency motivation for improvement and that there is a willingness to follow through on problem resolution.

Future-Orientation

Evaluation should have a time element; that is, one of its aims should be to detect situations and emerging problems which may have serious impact in the future. Thus, appropriate action can be taken before a crisis occurs rather than in reaction to a crisis.

Integration With Other Management Systems

The EEO evaluation process should be closely integrated with personnel and other management systems and services so that the impact of all managerial activities on EEO and personnel management can be identified. Top management can then make decisions with full knowledge of the personnel implications involved.

Agencies must view each program goal, plan, action, and followup, as well as related employment and personnel policies and practices, as subjects for searching inquiry and evaluation; EEO principles are applicable to all personnel management areas. The review, analysis, and evaluation must be of sufficient depth and detail to assure management that all program areas reviewed are:

—In compliance with all merit system principles including EEO; and

—Carried out with affirmative action so that all persons, including minority group members and women, have true equality of opportunity in employment.

Furthermore, the evaluator should help the manager to see that EEO is good personnel management and that this involvement in EEO will contribute, in a positive way, toward solving or alleviating some of his operational personnel management problems, such as staffing, effective utilization of the workforce, and training and development.

Evaluation as a Continuing Process

Internal evaluation should not be restricted to occasional or periodic intensive efforts but should be a continous process. Specifically:

—Management should be aware of changes in the program or in operations (new requirements, employment decreases, job realinements, etc.).

—Subordinate level reports should keep top management aware of EEO developments, problems, and progress.

—Mechanisms should be devised to permit early attent. n, restudy, further reports, change in approach, or corrective actions as needed.

—Followup should be continous to make certain that required changes are being implemented.

IV. Evaluation Methods

The choice and use of one or a combination of analysis methods should follow careful determination of which approach will best meet your specific needs and circumstances. Possible methods include:

- Onsite visits by managers to facilities away from headquarters.
- Special task force for overall or specific area review.
- Program committees with continuing review and report responsibility.
- Written reports by subordinate levels.
- Periodic review and analysis of statistical studies. Data on minority group members and women, broken down by organizational unit, grade or pay level, occupation, supervisory status, etc., should be useful as indicators of results which have been achieved. Figures on the availability of minority group members and women in the labor market should also be helpful in assessing the agency's progress in relation to the supply of minority group members and women possessing the required skills in the recruiting area. However, statistics in themselves are not the sole measure of success and must be evaluated along with other efforts made to promote the EEO program.
- Periodic review of the adequacy of the EEO counseling and discrimination complaint process.
- Continuing review of personnel program (recruitment, promotion, training, etc.) and related personnel activities (dissemination of information to employees, maintenance of accurate personnel records and files, etc.).
- Interviews with employees, supervisors, and management.
- Administration of voluntary questionnaires to sample of workforce.
- Assessment of results of EEO committee activities.
- Review of collaboration of the agency with the community (civic organizations, minority groups and leaders, women's organizations, other special interest groups, etc.).

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V. EEO Problem Identification-Problem Solution

Equal employment opportunity progress depends to a great extent on managerial support and leadership. The involvement and commitment of management officials is absolutely essential for the success of the program since they have the responsibility of leadership. Program success will depend considerably on the acceptance, understanding, determination, and positive direction given by managers, supervisors, and staff personnel.

Equal employment opportunity program success also depends on management's effectiveness in analyzing the factors and problems bearing on equal employment opportunity and on management's ability to plan and implement an action program designed to solve these problems.

The model below provides a conceptual framework outlining how managers can identify EEO problems, analyze the cause of these problems, order and choose from among alternative solutions, make and act upon a final decision to produce change. The model can apply at any level of the organization. Its purpose is to increase understanding of how a typical problem identification-problem solution process should work.

The EEO problem identification-problem solution process ideally operates in this pattern:

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Explanation of the Model

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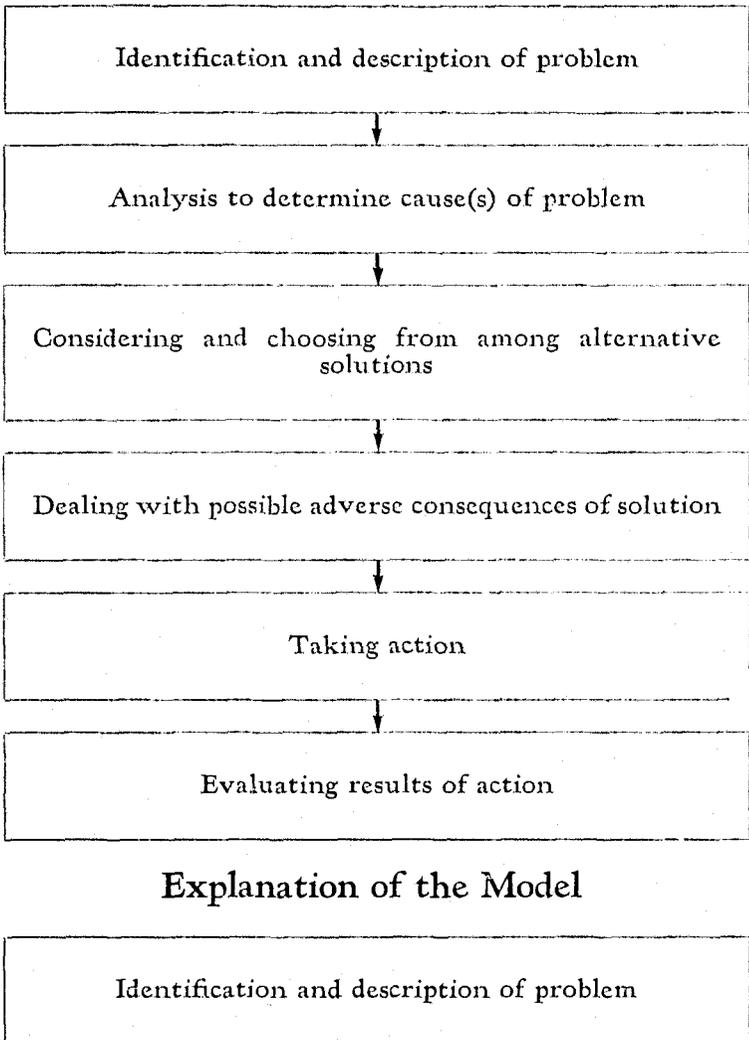
Problem Identification

The word "problem" is used here to represent the reasons for failure to meet expected performance. That is, something is happening when it should not be, or it is not happening when it should be. Because of our tendency to generalize or to speak in global terms, symptoms of a problem are often confused with the specific statement of that problem. Recording symptoms is not problem identification and, unless we can keep these concepts separate, much of our problem solution effort will be misdirected if it focuses principally on symptoms.

For example, a review of an organization discloses an undercurrent of dis-content among a number of employees about the merit promotion program. This discontent is particularly strong at the lower grade levels and among minority and women employees. As a problem statement, such a generalization cannot be regarded as more than a first step. It is not a workable problem state-ment but rather a descriptive statement of the atmosphere within the organiza-tion. It indicates the existence of one or more specific problems which must be identified and resolved to improve the functioning of the organization. It is a general problem statement which is symptomatic of a number of specific problems.

The objective in problem identification is to sort out or separate individual problems from broad generalizations. Since our example is not a workable problem statement, what would appropriate, specific problem statements look like in breaking down our example? A variety of deficiencies or reasons for employee discontent might be identified in this organization. They could be stated in the following manner:

— The agency has not adhered to the requirements of its promotion plan.
— Employees do not understand how the merit promotion plan is supposed to work or how it does work.
— Supervisors practice favoritism in selecting employees for promotion.
— Minority group and female employees are rarely selected for promotion although they are frequently among the best qualified candidates.

Even though each of these problem statements is related to or comes from the general statement of discontent with the merit promotion program, each is different from the original statement because it is specific enough to permit further analysis. The problem statements are manageable; further problem description, cause analysis, and solution are possible and probable. The general statement does not lend itself to careful analysis and may cause much wasted effort if it is used as the basis for problem solution.

Problem Description

Once the problems of the organization under review are identified, they should be described in as much detail as possible. If we choose from our examples the statement that the agency has not adhered to the requirements of its pro-motion plan, how could this statement be further described? We could begin by asking what does this statement mean. What procedures of the promotion plan is the agency violating? Is it evaluating and correctly ranking its employees for promotion? Are the merit promotion records and files properly documented? Is there competition for vacancies to the degree described in the plan? We are trying to describe the problem in terms of deviation from expected or normal behavior. What is this agency doing that it should not be, or not doing that it should be in terms of its merit promotion plan?

Analysis to determine cause(s) of problem

Once a problem has been identified and described, the manager begins his search for causes of that problem. To continue with our example, the manager must determine why the merit promotion plan is being violated by supervisors who:

—Use selective placement factors to unduly restrict the number of eligible candidates for promotion;

—Initiate noncompetitive details for higher level positions which result in promotions; and

—Select employees for promotion without regard to the requirement for competition and appropriate vacancy announcements.

The failure of supervisors (as managers in a given agency) to follow their own merit promotion plan by engaging in such inappropriate behavior is a serious matter, and one which must have a cause. The manager should make every effort to determine the cause of such behavior with great accuracy, for his statements of cause will in effect delimit the solutions he proposes for this problem.

What might be the cause(s) of the behavior described in our example? There is considerable deviation from what is expected by the promotion plan, and .there should be some explanation for such behavior. Is the plan too complicated or too complex to be workable? Does it take an inordinate amount of time to fill vacancies? Do supervisors understand their responsibility to make the plan work? Is there a question of bias and a deliberate attempt to restrict the entry of certain segments of the workforce into particular positions? The manager must test each possible cause in a critical way to determine if it fully explains the problem, and if what appears as the most likely cause is indeed the *real* cause of the problem.

Considering and choosing from among alternative solutions

After a given problem and its causes are analyzed, a manager turns to the decision that he must make to resolve the problem. The initial step is to co.. .ruct several approaches that might eliminate the causes of the problem, and the problem itself. If he has analyzed the cause(s) of the problem correctly, it will not be difficult to formulate solution proposals. These proposals may be simple or they may be elaborate; they may be achieved quickly or continue for months. In any case, the manager should consider carefully what the alternative approaches to solving the problem may be before he adopts one specific approach.

One caution at this stage: the tendency in the real world is to look at problems in a fragmented perspective. During the course of a workday, a manager is

is confronted with a series of problems in a linear way. Each of these incidents needs attention but they can distort the managers' problem-solving perspective. That is, if a manager begins to see problem solving as a series of small crises which must be dealt with as they arise, he may fail to understand how these individual problems relate to a weakness that is widespread in a particular organization. Such a far-ranging problem may require a solution that addresses itself to the entire system rather than a series of incidents.

An example of this difference would be the message that a series of discrimination complaints should give to agency management. Each complaint must be investigated and resolved individually; however, the incidents might be indicative of a situation that needs correction throughout the agency. This would require a problem solution technique with a much broader approach to correct a system defect rather than continuing to deal on an individual basis with an ever-larger volume of complaints. The impact on organizational effectiveness is far greater if managers keep their perspective and understand the relationship that individual problems have to the entire management system.

Dealing with possible adverse consequences of solution

Managers should take time to consider the consequences of their proposed problem solutions. Sometimes solutions create more adverse consequences than the original problem. A systematic review of the proposed plan of action before a final decision is made may reveal circumstances which will prevent the objectives of the proposed solution from being attained. The situation may change or important items may have been overlooked in the rush to take action.

In addition, there should be a contingency plan developed to overcome those difficulties that might reasonably be forseen in implementing the problem solution. The resistance of staff to change, or the reluctance to admit that current procedures are not effective can prove to be formidable obstacles to even the most carefully constructed problem solution. The manager must anticipate such difficulties if he or she is to have strong followthrough in assuring that results are being achieved. If his action plan is to be directed toward positive change in the organization, the final assessment of the proposed problem solution must include a consideration of the consequences of his decision as well as a preparation for the obstacles that can be anticipated in its implementation.

Taking actlon

When the final assessment is completed, the action plan is ready to be applied to the agency's internal organization and external environment. Here is where

effective performance is directed toward positive change in the organization. Here is where managers, supervisors, and staff carry out responsibilities for action plan items and here is where the manager must have strong followthrough to assure that results are being achieved.

Evaluating results of action

The last step in the problem solution process deals with the evaluation of the results of the implemented plan of action. What happened? Did anything happen? Just how effective were the decisions that were made in implementing this plan of action? To what extent were the objectives of the plan achieved?

Managers should place heavy emphasis on evaluation as an integral part of the problem identification-solution process. Although evaluation has been placed at the end of this model, it should not be restricted to the end of the process. It actually begins with the identification of problems and continues to provide feedback to managers throughout the solution process. What may be regarded as the last step in the problem solution process, may also be considered the first step in the ensuing cycle of problem identification.

VI. Guidelines for Evaluating EEO Affirmative Action Program Elements

In summary, the evaluation objectives as stated in chapter II can be expressed as an effort to determine whether or not an agency is maintaining an affirmative equal employment opportunity program. Therefore, evaluation of EEO programs should include assessments of an agency's progress and results under the following affirmative action program elements.

Allocation of personnel and resources

Have sufficient resources been assigned and organized to administer and carry out the EEO program in an effective manner?

Recruitment activities

To what extent are recruitment efforts reaching all sources of job candidates, with special emphasis on the identification and development of sources of minority group members and women for positions in which few are now employed?

Utilization of skills

To what extent are employees with underutilized skills being systematically identified in the work force and channeled into available job opportunities?

Upward mobility

To what extent are opportunities being made available to employees for enhancement of skills, performance at their highest potential, and advancement in accordance with their capabilities?

Assurance of supervisory and management understanding and support

To what extent do communications, training, incentives, and performance evaluation actually motivate supervisory and management efforts to achieve program objectives?

Participation in community efforts to improve conditions which affect employability

To what extent does the installation initiate, support, and cooperate with community efforts to eliminate long- and short-range barriers to equal employment opportunity?

Resolution of complaints

To what extent are discrimination complaints fairly and impartially processed with special emphasis on informal resolution? Has management provided adequate resources to assure the timely processing of complaints?

Qualification and training of EEO officials

Do agency EEO officials meet appropriate qualification standards? Have their their qualifications been reviewed by competent authority? What training is provided to these officials in su,.,.... of their work?

Special programs for the disadvantaged

To what extent is there participation in special employment programs?

Job restructuring

To what extent have:
— Higher level jobs been restructured to separate nonprofessional duties from these jobs and place them into existing lower level or new entry level jobs?
— Efforts been made to include as many positions as feasible into specific career ladders so that employees will have greater opportunities for upward and lateral mobility?

Goals and timetables

Where the affirmative action plan includes goals and timetables, to what extent are they:
— Realistic and flexible?
— Accompanied by the necessary affirmative action needed to achieve them?
— Periodically reevaluated and updated based on the needs of the program and changes in the work force?

When the affirmative action plan has not included goals and timetables, do problems exist within the organization which indicate a need for them?

Employment of women

To what extent does the EEO action plan consider the specific factors and circumstances affecting employment opportunities for women? For example:
— Adequate counseling and information on job opportunities for trained women.
— Job design and employment practices which will aid in the employment and advancement of women, such as part-time employment and maternity leave.
— Managerial and supervisory training for women.
— Efforts made to advance the careers of women in dead-end positions and establish new career lines.
— Review of job structure and management practices to identify any organizational or occupational areas where traditional thinking limits the utilization or progression of women (e.g., apprentice training, skilled trades, technicians).

—Opportunities for top-level positions through training, job rotation, and special assignments.

Responsiveness to special problems of particular minority groups

To what extent does the EEO action plan include items related to the special problems of specific minority groups? For example:
— The sixteen-point program for Spanish-surnamed Americans.

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