



**U.S. GOVERNMENT
PRINTING OFFICE**

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**DIVERSITY MANAGEMENT PROGRAMS AT
THE GOVERNMENT PRINTING OFFICE**

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Statement of

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Before the

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and the District of Columbia**

Committee on Oversight and Government Reform

U.S. House of Representatives

OFFICE OF INSPECTOR GENERAL

Thank you, Chairman Davis and Ranking Member Marchant, for the opportunity to testify before the Subcommittee on the issue of diversity management at the U.S. Government Printing Office (GPO). I will keep my testimony brief today and ask that my written statement be made part of the record of these proceedings.

I believe that embracing the unique qualities of each individual and ensuring the full and meaningful implementation of equal employment and diversity policies and objectives is essential to enhancing the quality of our work life and the productivity of our workforce. Everyone in the workplace should be afforded the opportunity to develop, perform, and advance to their maximum potential based solely on their merit and without regard to race, color, religion, national origin, gender, age, disability, or sexual orientation.

At the request of the Subcommittee, my office along with my colleagues at the Library of Congress, U.S. Capitol Police, Architect of the Capitol and Government Accountability Office conducted audits of diversity management programs at our respective agencies. The overall objective was to address the extent to which diversity offices have effective programs in place to address diversity within each agency.

At GPO, we specifically sought to:

- Identify and assess the diversity program at GPO to determine if it is yielding the desired results—that of creating a more diverse population of women and minorities in top leadership positions, specifically the Senior Level Service (SLS) (the GPO equivalent of the Senior Executive Service);
- Evaluate the accuracy and completeness of the complaints and discrimination data reported to Congress; and
- Assess the degree to which diversity offices or functions are independent of the General Counsel and the Public Printer.

We used EEOC Management Directive 715 (MD-715) and the leading diversity management practices identified by the Government Accountability Office (GAO) as a benchmark to conduct our assessment. It should be noted at the outset that the GPO is not required to comply with either MD-715 or with the GAO practices; however, prior to our commencement of this audit, GPO had already begun to voluntarily adopt some of the practices and recommendations.

On September 11, 2008, we issued a report entitled *Diversity Management Programs at the Government Printing Office*.¹ Our audit results indicated that GPO has made progress in developing its pool of Grade 15s to ensure a qualified minority pool for the Agency's SLS. However, improvements can be made towards further enhancing the diversity of the Agency's corps of SLS employees.

We also found that GPO complaints and discrimination data reported to the EEOC during fiscal year (FY) 2007 and eventually reported to Congress were accurate and complete. Further, we found that the EEO Director is independent of the General Counsel, and to an appropriate extent, independent of the Public Printer in EEO matters.

The audit specifically identified that although GPO is not required to comply with the provisions of MD-715 or GAO's leading diversity management practices, GPO has generally adopted three elements for creating and maintaining a model EEO program identified by MD-715, namely:

- Demonstrated commitment from leadership,
- Efficiency, and
- Responsiveness and legal compliance.

Agency officials have also demonstrated "top leadership commitment," one of the GAO's nine leading diversity management practices.

While in the last several years GPO management has made progress in managing and developing diversity and EEO programs, we believe that Agency management could improve its diversity management.

Accordingly, in our report, the GPO OIG recommended that Agency management incorporate the remaining three elements of EEOC Management Directive 715 and all or a combination of the nine leading diversity management practices identified by the GAO. Implementation of these recommendations should not only improve the GPO diversity program by providing a more diverse population of qualified women and minorities in top leadership, but also contribute to GPO's ability to meet its future employment challenges. GPO management concurred with the recommendations; however, did not provide details regarding what actions the Agency plans to take to implement the recommendations.

¹ Report 08-10 may be found on the GPO OIG website at www.gpo.gov/oig.

Background

GPO Demographic Profile

By way of background, as of January, 2008, GPO had a total workforce of 2,263 employees which includes both white and blue collar personnel. White collar employees generally consist of administrative, technical, clerical, professional and management personnel while blue collar employees consist generally of those employees who work in production departments. Notably, GPO is one of the largest blue collar employers in the District of Columbia. Of that total workforce, 42.3 percent are women and 60.1 percent are minorities.

Among the white collar workforce (a total of 1163 employees), 42.3 percent are women and 52.5 percent are minorities. And, in the last five years, GPO has made significant progress in the overall diversity of its senior workforce. Specifically, in FY 2002, 31 out of 32 Grade 15s were men (96.9%) and included only 6 minorities (19%). In FY 2007, the pool of 15s grew to a total of 79 and included 56 men (71%) and 23 women (29%), 25 of the total are minorities (32%).

And some progress has been made in the makeup of its SLS employees. In FY 2002, there were 21 SLS employees consisting of 20 men (0 minorities) and one woman (1 minority). In FY 2007, there were a total of 26 SLS employees consisting of 23 men (1 minority) and 3 women (2 minorities).

The Office of Equal Employment Opportunity

The GPO has an Equal Employment Opportunity (EEO) Office that is responsible for compliance with civil rights statutes and regulations governing Federal employment.² The EEO Director is responsible for ensuring that equal opportunities exist for employees and applicants without regard to race, sex, color, religion, national origin, sexual orientation, age, physical and mental disability.

The EEO Office consists of two divisions: (1) the Affirmative Employment Program (AEP) Division, responsible for assuring that equal opportunity principles are an integral part of every aspect of personnel policy and practice in the recruitment, employment, development, advancement, and treatment of GPO staff and applicants for employment; and (2) the Counseling and Complaints Processing Division (CCPD) responsible for managing the EEO complaint process for employees and applicants involving allegations of discrimination.

² Title VII of Civil Rights Act of 1964, Age Discrimination in Employment Act of 1967, and Title I of the Americans with Disabilities Act of 1990.

The GPO also has in place several programs and employee organizations that address minority issues and concerns. Among them, the Disability Program which helps to raise awareness of disability policies and programs through outreach and education, and helps elevate disability concerns to Agency management. The program committee works with the EEO Office to identify employment barriers to persons with disabilities, review Agency policies, address employment issues, and recommend changes.

In addition, the Hispanic Employment Program's (HEP) mission is to help eliminate discriminatory practices, assist in eliminating areas of underrepresentation or underutilization, evaluate practices for disparate impact or treatment, and recommend changes to eliminate barriers to Hispanic employment. The Federal Women's Program (FWP) works to identify, promote, and enhance employment and training opportunities for women. The committee also helps keep women at GPO apprised of employment issues; assists in training, career development, and advancement; provide networking channels with other FWP organizations on issues related to eliminating barriers to equal access and opportunity; and promotes professionalism.

GPO has additional programs which are more fully described in our report.

I note here that the GPO policies against discrimination are broader than those contemplated by this review. Namely, GPO's policies against discrimination include persons with disabilities, as well as gays, lesbians, and bisexuals. Indeed, a conversation about diversity is not possible unless all diverse populations and cultures that enrich our workforce are included in the discussion.

Findings and Recommendations

EEOC Management Directive 715

MD-715, issued by the EEOC on October 1, 2003, provides the basic elements necessary for creating and maintaining a model EEO program in the Federal government. A model EEO program incorporates a structure for effective management, accountability, and self-analysis to help ensure program success. MD-715 provides six essential elements to include in a model EEO program:

- Demonstrated commitment from agency management;
- Integration of EEO into the agency's strategic mission;
- Management and program accountability;
- Proactive prevention of unlawful discrimination;
- Efficiency; and
- Responsiveness and legal compliance.

While MD-715 applies to agencies in the executive branch it does not apply to the GPO.

The OIG assessed the current status of GPO's voluntary efforts to integrate the six elements of MD-715 into the structure of the Agency. Although not mandated, senior officials at GPO have begun to follow several key elements for creating and maintaining a model EEO program into the structure of GPO. For example, GPO has generally demonstrated commitment from agency leadership, met the standards of efficiency, and has been responsive and complied with legal requirements.

While detailed results of our assessment are more fully discussed in our report, the following summary is provided for your consideration:

1. A fundamental tenet for any diversity or EEO program is demonstrated commitment from agency leadership. GPO has taken initiative in this area, in large part due to the issuance by the Public Printer of a policy statement to all GPO employees, emphasizing his personal commitment to equal opportunity and diversity. MD-715 suggests that such a policy be issued and reaffirmed annually. Accordingly, we recommended that the Public Printer continue to issue a policy statement addressing his commitment to EEO and diversity on a yearly basis.

2. MD-715 provides that diversity should be a part of the agency's strategic mission and that an agency's EEO program should be organized and structured in a way that maintains a workplace free from discrimination through its policies, procedures, or practices. While management has recognized several aspects of this Element, we recommended that as the new

Public Printer formulates his strategic plan, he include EEO and diversity as an integral part of GPO's strategic mission.

3. To ensure management and program accountability, MD-715 discusses the need for overall accountability and EEO program management and recommends that the head of an agency should hold managers, supervisors, and EEO officials responsible for effective implementation of an agency's EEO program and plan. In that regard, we recommended that business unit managers develop an EEO plan for their individual units and that EEO and Human Capital officials meet regularly to identify any systemic barriers in hiring, promotions, training, and awards.

4. According to MD-715, each agency has an obligation to prevent discrimination on the basis of race, color, national origin, religion, sex, age, reprisal and disability, and to eliminate barriers that impede free and open competition in the workplace.³ Putting such an obligation into place begins with informing employees about an effective anti-discrimination policy that explains the protections afforded by the civil rights laws, the rights afforded in such situations, and the process for redress. Further, the head of an agency must make efforts early to prevent discriminatory actions and eliminate barriers to equal employment opportunity in the workplace.

While the Public Printer has communicated his policy and commitment, in fact more broadly than contemplated by MD-715, to further this commitment, we recommended that the Agency conduct annual self-assessments to monitor progress and identify areas where barriers may exclude certain groups. Such analysis will help the Agency develop strategic recruitment plans to eliminate those barriers to the extent possible and to attract a qualified, diverse pool of applicants.

5. MD-715 further requires that the agency head ensure that there are effective systems in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process. Critical to this element are adequate and accurate information collection systems. Such systems fully integrated into an agency's infrastructure help it conduct periodic reviews—thus allowing the agency to stay on top of those things affecting the myriad of EEO areas. For example, although GPO is conducting outreach programs, it does not have an effective method to track success. We recommended that such systems be put in place to evaluate the impact and effectiveness of the EEO programs.

³ The Statement of the Public Printer, dated April 8, 2008, is more comprehensive than that recommended by MD-715: "Employment actions must be based upon merit principles and made without regard to an individual's race, color, religion, national origin, sex, age, mental/physical disability or sexual orientation."

6. And finally, MD-715 requires that each year an agency certify that it is complying with EEO laws and EEOC regulations, policy guidance, and other written instructions, and further that agency personnel should be accountable for the timely compliance with EEOC orders. While generally following the requirements of this provision, management can further its commitment to maintaining a workplace free of discrimination and harassment as well as a commitment to EEO and diversity by requiring compliance with EEO laws and EEOC regulations in the performance standards of all managers and SLS personnel.

The GAO Leading Practices

In January 2005, GAO issued a report to the Ranking Minority Member, Committee on Homeland Security and Government Affairs, U.S. Senate entitled “Diversity Management: Expert-Identified Leading Practices and Agency Examples.”⁴ This report identified nine leading practices to be considered when an organization is developing and implementing a diversity management program. The practices that GAO identified include:

- **Top leadership commitment**—a vision of diversity demonstrated and communicated throughout an organization by top-level management;
- **Diversity as part of an organization’s strategic plan**—a diversity strategy and plan that are developed and aligned with the organization’s strategic plan;
- **Diversity linked to performance**—the understanding that a more diverse and inclusive work environment can yield greater productivity and help improve individual and organizational performance;
- **Measurement**—a set of quantitative and qualitative measures of the impact of various aspects of an overall diversity program;
- **Accountability**—the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives;
- **Succession planning**—an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization’s potential future leaders;
- **Recruitment**—the process of attracting a supply of qualified, diverse applicants for employment;

⁴ GAO 05-90, January 14, 2005, available at <http://www.gao.gov/newitems/d0590.pdf>.

- **Employee involvement**—the contribution of employees in driving diversity throughout an organization; and
- **Diversity training**—organizational efforts to inform and educate management and staff about diversity.

We reviewed GPO's diversity programs to benchmark the Agency's standing in relation to GAO's nine leading diversity management practices, which in some respects mirror some of the MD-715 elements. As summarized below, we made several recommendations that should promote the GAO practices. The results of our review are more fully discussed in our report.

1. Key to the success of any diversity program is top leadership commitment. As noted previously, the Public Printer has emphasized his personal commitment to equal opportunity and diversity at GPO. Ongoing commitment from the Public Printer and senior management will be crucial to the success of GPO's diversity and EEO programs.
2. Additional emphasis should be placed on integrating diversity into the Agency's strategic plan to foster a culture of change that supports and values differences.
3. Diversity management makes good business sense, enhancing productivity and innovation. In addition, diversity management can help reduce costs by reducing turnover, increasing employee retention across demographic groups, and improving morale. GPO should include the development of diversity management as part of its strategic plan and should implement methods to measure and evaluate the effectiveness of the organization's diversity management.
4. As noted above, annual assessments are vital in helping an agency evaluate the effectiveness of its diversity management. In order to conduct assessments, GPO should maintain and provide sufficient resources, including workforce data and information technology tools, to allow EEO officials to track the effectiveness of diversity efforts.
5. At GPO, managers and supervisors are held to core EEO commitments in order to obtain performance bonuses. These core commitments must emphasize the value of creating a diverse workforce and address the culture of diversity as opposed to mere compliance with laws and regulations in order to nurture talent, create diverse opportunities and maximize the potential of GPO's workforce.
6. Succession planning is tied to the Federal Government's opportunity to change the diversity of the executive corps through new appointments and is a comprehensive, ongoing strategic process that enables management to

forecast an organization's leadership needs. Identifying and developing candidates who have the potential to be future leaders, and selecting individuals from among a diverse pool of qualified candidates to meet executive resource needs is at the heart of succession planning.

Another way GPO supports succession planning is through leadership programs. A new Leadership Development and Recruitment (LDR) program—a two-year career-building program—began in FY 2007. As part of the LDR program, employees are recruited from both inside and outside the Agency. The program allows employees to work in a number of business units to get a range of hands-on experience of GPO to become potential future leaders within those same business units. In FY 2007, there were 13 employees—8 males (4 minorities) and 5 females (3 minorities)—enrolled in the LDR program. The second LDR class began in June 2008 with seven employees—five males and two females (1 minority).

GPO still has work to do to improve the diversity of its SLS corps with the inclusion of Asian American/Pacific Islanders, Hispanic Americans, and Native Americans; however, in the last five years GPO has worked to create a more diverse pool of qualified candidates for future SLS positions at both the Grade 15 level and through implementation of the LDR program.

7. Attracting a supply of qualified and diverse applicants is essential for an organization's long term success. In 2006, GPO hired a Recruitment Manager who worked with GPO managers to establish a plan to recruit diverse candidates for a number of positions, including the LDR. He, along with other recruiters, visited Historically Black Colleges and Universities and Hispanic-Serving Institutions. A similar plan created in coordination with the EEO Manager is in place for 2008/2009. Also, the Hispanic Employment Program Manager e-mails job vacancies to 67 Hispanic organizations and to more than 800 Hispanic Employment Network individuals.

However, such efforts by Human Capital and EEO may not be fully realized in the absence of participation by the business unit managers who are ultimately responsible for making employment selections. Accordingly, we recommended that these business unit managers be included in outreach and recruitment efforts.

8. Involving employees in diversity management helps contribute to diversity throughout the organization. Employees can get involved by: (1) forming employee diversity task forces, councils, boards, and networks to identify issues, recommend actions, and help develop initiatives to facilitate change; (2) providing mentoring opportunities to help identify and develop high-potential employees, improve employee productivity and performance, and promote retention and diversity; and (3) encouraging employees to volunteer

in their communities and allocating mission personnel to participate in community outreach programs with private employers, public schools, and universities.

GPO has several diverse employee groups including the Federal Women's Program, the Hispanic Employment Program, and Disability Committee that help identify issues and recommend actions to GPO management. These groups could also aid GPO management in the development of initiatives and recommendations for a diversity strategic plan identified in the GAO report. GPO management should continue to evaluate its existing employee groups, identify whether employees issues are fully represented and ensure that the groups are meeting the objectives.

9. Finally, the OIG believes that officials from both EEO and Human Capital should work together to develop a diversity training curriculum that can be provided to all GPO employees.

Conclusion

I am pleased that GPO management has concurred with our recommendations to incorporate the remaining provisions of EEOC Management Directive 715 and adopt all or a combination of the leading diversity management practices identified by the Government Accountability Office. However, management did not provide details regarding what actions the Agency plans to take to implement the recommendations. As a result, pending receipt of details related to implementation, the recommendations are considered unresolved.

While GPO is likely to face challenges in its management of diversity initiatives, there is a sense of responsibility to improve diversity programs and ensure a process that is both practical and effective. My office is committed to working with Agency management to help ensure that GPO's diversity program continues to improve and that GPO will be able to meet its future employment challenges with a more diverse population of qualified women and minorities in top leadership positions.

Thank you again for the opportunity to testify before the Subcommittee regarding our oversight work on diversity management at GPO. Additionally, I want to express my thanks to Supervisory Auditor Joseph Verch and my AIG for Audits Kevin Carson for their work on this audit.

This concludes my testimony. I would be pleased to address any questions you may have.