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REPORT TO THE CONGRESS



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Upward Mobility Programs In The Federal Government Should Be Made More Effective

Civil Service Commission

**BY THE COMPTROLLER GENERAL
OF THE UNITED STATES**

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APRIL 29, 1975

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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To the President of the Senate and the
Speaker of the House of Representatives

We reviewed the upward mobility programs of 19 Federal departments and agencies to assess their progress and identify any problems. We found a need for better planning, counseling, evaluations, and selection of participants and are making recommendations to the Civil Service Commission for improving its guidance, monitoring, and enforcement efforts.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and to the Chairman, Civil Service Commission.

A handwritten signature in black ink, reading "James B. Starks".

Comptroller General
of the United States

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ABBREVIATIONS

| | |
|-----|------------------------------|
| CSC | Civil Service Commission |
| EEO | Equal Employment Opportunity |
| GAO | General Accounting Office |

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

UPWARD MOBILITY PROGRAMS
IN THE FEDERAL GOVERNMENT
SHOULD BE MADE MORE EFFECTIVE
Civil Service Commission

D I G E S T

WHY THE REVIEW WAS MADE

GAO reviewed the upward mobility programs of 19 Federal departments and agencies to identify problems and assess the programs. These departments and agencies employ about 92 percent of the Federal civilian work force. (See p. 35.)

GAO also evaluated the adequacy of the Civil Service Commission's policies, procedures, and guidance to agencies on upward mobility.

Upward mobility is defined as a systematic Federal management effort to focus personnel policy and practices on developing and implementing specific career opportunities for lower level employees in limited positions or occupational series which do not enable them to realize their full work potential. (See p. 2.)

Approximately 10,000 Federal civilian employees were participating in upward mobility programs as of December 1973. Data on the cost of upward mobility programs in operation at that time was not readily available. However, the Commission estimated that \$46 million will be expended on Federal agency upward mobility programs during fiscal year 1975. (See p. 3.)

FINDINGS AND CONCLUSIONS

Neither the Commission nor the 19 examined agencies had data necessary to assess the program's achievement.

GAO's analysis, however, strongly indicated that:

- Only limited upward mobility had been attained.
- 10 of the agencies had not initiated significant efforts.
- In the nine agencies that had initiated significant efforts, programs were poorly structured and ineffective.
- Some agencies may have violated chapter 41, title 5, of the United States Code (formerly Public Law 85-507, July 7, 1958, the Government Employees Training Act). (See pp. 1, 2, and 6.)

The upward mobility programs, which were improperly structured, resulted in little upward mobility because

- employees with unused skills were not identified and other employees were offered training they did not need,
- target jobs were not identified or made available to enable employees to use the training provided,
- training and education appeared to be overemphasized, and

--many participants dropped out.
(See pp. 6 to 10 and p. 12.)

Proper program planning
not followed

None of the agencies had developed or followed adequate planning procedures. Agency officials said the pressures to get the programs operational superseded the need to properly plan and structure them. Also, the Commission had not provided adequate guidance to agencies for planning and structuring upward mobility programs. (See pp. 6 to 10.)

Effective upward mobility planning begins with systematically determining the extent of upward mobility problems. This determination is essential because upward mobility needs vary among and within agencies.

Determining the extent of existing inhibitions for upward movement of employees in the various agencies will aid in establishing the scope as well as the direction to be taken in instituting upward mobility efforts. None of the 19 agencies examined had made this determination.

The 10 agencies without significant programs said their inaction was caused by lack of high-level management support coupled with competition from other personnel programs.

The nine agencies that did initiate significant programs made general but unsystematic determinations of the need for such programs.

Commission guidance had not emphasized the importance of agencies' determining at the outset the extent of their upward mobility problem. (See pp. 4 to 6.)

Other planning actions which should have, but frequently had not, preceded implementation of the programs of the nine agencies that initiated significant upward mobility efforts included

- obtaining top management commitment,
- identifying human and financial resources,
- identifying future manpower needs,
- identifying target jobs, and
- conducting skills utilization surveys. (See pp. 6 to 10.)

Commission guidance also failed to emphasize the importance of taking these planning actions in the proper order.

In addition, Commission guidance had not stressed the importance of identifying specific problems to be solved and the resources necessary to solve them. (See pp. 4 to 7.)

Ineffective career counseling
and selection procedures

Career counseling, which brings together better job opportunities and employees with unused skills and potential, was generally not effective because:

- Commission guidance on counseling was lacking.
- Counseling had taken a "back seat" to training and education activities.
- Sufficient funds and manpower resources were not provided.

--Counselors lacked essential job availability information. (See pp. 12 and 13.)

Competitive candidate selection procedures had not always been used. (See pp. 16 to 19.)

Supervisory appraisals were not always used in selecting program participants, even though they were required by the Federal Merit Promotion Policy. (See pp. 20 and 21.)

Need to strengthen program reviews and evaluations

Neither the Commission nor most of the agencies examined had consistently evaluated accomplishments or costs of agency upward mobility programs. (See pp. 22 to 24.)

The Commission lacked or did not use valid criteria to assess program results. Agencies could not show how much their actions were correcting employees' upward mobility problems because problems were not identified. (See pp. 24 to 26.)

Many employees had not moved into jobs using their skills, training, and potential. (See pp. 7 to 10.)

Some agency programs were successful on a limited basis, demonstrating that upward mobility can work. (See ch. 6.)

Effectiveness of the agencies' upward mobility programs could be greatly enhanced if the Commission would improve guidance relating to planning and structuring the programs and program counseling and selection. Such guidance would help agencies planning or implementing upward mobility efforts and those

that need to modify existing programs.

Program implementation could be improved if the Commission and the agencies strengthened their program evaluation procedures and practices. (See pp. 29 and 30.)

New Commission guidelines issued

In June 1974 the Commission issued new upward mobility guidance (Federal Personnel Manual Letter 713-27, June 28, and Civil Service Commission Bulletin 410-83, June 26) addressing many of the areas of concern to GAO.

This guidance emphasized the necessary steps in program planning, including identifying manpower needs and target positions for upward mobility, developing plans, and conducting skills utilization surveys.

The guidance also addressed the importance of the selection process and of applying merit principles in that process.

Commission guidance did not, however, sufficiently address counseling and program review and evaluation. (See pp. 29 and 30.)

RECOMMENDATIONS

The Chairman of the Commission should:

--Provide more detailed guidance to department and agency heads on the importance of identifying the need for upward mobility programs as the first step in the planning process.

--Closely monitor actions planned

or taken by department and agency heads in response to the Commission's June 1974 guidance on upward mobility, particularly actions regarding top management commitment, proper program planning, and conducting skills utilization surveys.

- Issue definitive counseling guidance to department and agency heads.
- Closely monitor actions planned or taken by department and agency heads to insure that (1) job-related selection criteria are used when selecting participants, (2) upward mobility program participants are selected in accordance with merit principles, and (3) supervisors are involved in the selection process.
- Enforce existing requirements that departments and agencies report upward mobility accomplishments; establish and use valid criteria to assess upward mobility progress; and develop a means by which upward mobility progress can be measured and communicate it to department and agency heads. (See pp. 30 and 31.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

The Commission said it would continue to improve its guidance and monitoring of upward mobility programs to assist agencies in meeting commitments through effective planning, training, and counseling.

The Commission said that to a certain extent this report describes conditions existing as long as 2 years ago and that agencies have

since made considerable progress in planning and administering upward mobility programs.

However, all information in the report was current as of June 1974 and some includes consideration of agencies' plans for later periods of time. In addition, information on four agencies' programs was current as of January 1975.

The Commission stated that many of GAO's specific conclusions and recommendations had already been addressed in its guidance.

GAO recognizes that the Commission's guidance has addressed many of GAO's conclusions and recommendations; however, more needs to be accomplished to improve program implementation and operation.

In closeout conferences, 10 Federal departments generally agreed with GAO's review determinations and the impact these determinations had on both operational and planned programs.

Agencies' actions in initiating, replanning, or actually changing programs indicates that improvement is taking place. (See ch. 8.)

MATTERS FOR CONSIDERATION BY THE CONGRESS

This report discloses weaknesses in the management of upward mobility programs and calls for the Commission and all Federal departments and agencies to provide needed upward mobility opportunities to all employees as required by Executive Order 11478 and the Equal Employment Opportunity Act of 1972.

CHAPTER 1

INTRODUCTION

Upward mobility, as a general concept, is not new in the Federal Government. The Federal Merit Promotion Policy, established in 1958, provided for qualified employees to compete for better opportunities. In 1966 the Civil Service Commission (CSC) initiated the Maximum Utilization of Skills and Training Program to improve the Federal work force's efficiency by redesigning jobs, where necessary, to best use employees' skills and training. Agencies generally did not comply with CSC's urging to identify employees with underused skills.

An August 1969 CSC report cited a need for a Federal-wide upward mobility program to encourage and assist lower level employees in fully using their skills and developing their potentials. As a result, Executive Order 11478, dated August 8, 1969, was issued to establish the framework and goals for the Federal Government's upward mobility program. Under CSC's leadership and guidance, agency heads, among other things, were as much as possible to

- fully use employees' skills,
- provide maximum opportunities for advancement,
- provide sufficient resources to administer their programs, and
- periodically evaluate program effectiveness.

The Equal Employment Opportunity (EEO) Act of 1972 supplemented the Executive order by requiring each agency to submit to CSC an EEO Affirmative Action Plan providing for employee training and education. CSC would be responsible for annually reviewing and approving each agency's EEO plan. This was the first time CSC was given clear authority to enforce upward mobility activities.

CSC instructed agencies that training and education provided under the EEO Act was to be carried out under the authority of chapter 41, title 5, of the United States

Code (formerly the Government Employees Training Act). According to CSC officials, the EEO Act did not give agencies any additional authority to conduct training and education. Agencies, under 5 U.S.C. 41, are required to

- determine their needs before enrolling employees in training programs (5 U.S.C. 4113),
- insure that fully trained employees are identified and given first consideration for these needs (5 U.S.C. 4118), and
- identify target jobs to insure that any training is related to present or potential job duties within the agency (5 U.S.C. 4101).

This law prohibits agencies from

- training employees by, in, or through non-Government facilities to fill positions by promotion if other employees are qualified and suited for the job and if they are available at, or within a reasonable distance from, the place where the duties of the position are to be performed (5 U.S.C. 4118) and
- educating an employee in a non-Government facility solely to provide him with an academic degree (5 U.S.C. 4107).

By law, the Government's upward mobility program is for all Federal employees. This means, and CSC has directed, that the program should be nondiscriminatory and available to any group or groups of employees. CSC stresses, however, that the greatest opportunity for impact is in the lower grade levels. Therefore, it defines upward mobility as a systematic Federal management effort to focus personnel policy and practices on developing and implementing specific career opportunities for lower level employees in positions or occupational series which do not enable them to realize their full work potential. In many geographic areas, however, because of the makeup of the work force, the target population is largely composed of minorities and/or females. Therefore, female and minority employees will inevitably benefit most from upward mobility programs.

Approximately 10,000 Federal civilian employees were participating in upward mobility programs as of December 1973. Data on the cost of upward mobility programs in operation at that time was not readily available. However, CSC estimated that \$46 million will be expended on Federal agency upward mobility programs during fiscal year 1975.

CHAPTER 2

PROGRAM PLANNING CAN BE IMPROVED

Proper planning, to insure that upward mobility program objectives are accomplished, should focus on

- determining the extent of upward mobility problems,
- obtaining top management support and resources,
- identifying future manpower needs,
- identifying target jobs, and
- conducting skills utilization surveys.

DETERMINING THE EXTENT OF UPWARD MOBILITY PROBLEMS

Effective upward mobility program planning begins with identifying situations in which upward mobility has been inhibited. This is essential, since upward mobility needs vary among and within agencies.

As of December 1973 none of the 19 agencies we reviewed had made this determination and 10 of the agencies had not initiated significant upward mobility programs. More recent information obtained in May and June 1974 indicated that agencies were still not determining the extent of their upward mobility problems; however, additional agencies were establishing programs. CSC guidance published in June 1974 should help alleviate this situation, especially for agencies planning programs.

Of the 10 agencies not having significant programs as of December 1973:

- Six indicated that upward mobility was not a high priority program because CSC and the Office of Management and Budget were emphasizing other personnel programs.

--Four cited lack of top management support as the primary reason for the lack of significant upward mobility programs.

The other nine agencies had determined generally, but not systematically, the need for such programs. According to agency officials, pressure to get these programs operational took precedence.

At the beginning of planning, upward mobility needs should be systematically determined by identifying and analyzing job patterns which prevent qualified lower grade level employees from advancing into jobs more fully using their skills, training, or potential. Such occupational analyses should include

- rate of personnel changes from lower to higher skilled occupations, by grade and job series;
- number of employees in apprentice, technician, and other development positions;
- ratio of jobs filled by promotions and reassignment to those filled from the outside in apprentice, technician, developmental, or entry-level professional positions by grade level; and
- job series and grade levels in which many employees appear impacted.

These analyses will show the target population toward which an upward mobility program should be directed.

In 1970 CSC defined the Federal-wide upward mobility target population as nonprofessionals or subprofessionals at grades GS-7 or below, or equivalent levels. The guidance did not mention that target populations should be based on the extent of each agency's own upward mobility problem. As a result, agencies specified target populations without determining where problems existed by using a work-force analysis.

Later CSC guidance, issued after many agencies had established their target populations, stated that agencies should use judgment in deciding the occupations and grade levels toward which upward mobility efforts should be directed.

OBTAINING TOP MANAGEMENT SUPPORT AND RESOURCES

Before a program can be properly implemented and operated, top management support and adequate financial and personnel resources must be obtained. Of the nine agencies that implemented upward mobility programs, none appeared to have committed sufficient personnel to manage and operate the programs and some also seemed to lack adequate financial resources. Several agency officials cited the lack of top management support as contributing to the lack of necessary resources.

IDENTIFYING FUTURE MANPOWER NEEDS

Manpower requirement projections should be based on attrition experience and personnel changes that will create vacancies. This estimate will show which positions are expected to become vacant and when so that the agency will be able to determine how many opportunities it can provide for upward movement. An agency that determines it has a need for upward mobility in its lower graded work force, but has insufficient opportunities to offer, should base its program on the opportunities available.

Because the agencies had not identified future manpower needs before initiating upward mobility programs, they had not determined the extent to which they could provide employees opportunities for upward movement. Most of the programs were oriented toward attaining college degrees despite (1) the 5 U.S.C. 4107(c) prohibition against training solely for degree purposes and (2) the lack of a determination that college training was required for the employees' upward mobility. Providing college training in fields for which it was not needed may have violated 5 U.S.C. 4107(c) and resulted in overtrained employees. The agencies seldom used existing "bridge" jobs to give employees on-the-job experience to help place them in target jobs, restructured jobs, or new jobs.

IDENTIFYING TARGET JOBS

After manpower needs have been determined, agencies must use manpower analyses and projections to assess current or potentially available positions (target jobs) within the organization which could provide increased career opportunities and correct identified upward mobility problems. After target jobs are identified, the requirements for successful performance at each step of the career ladders or paths in the various job series must be determined.

Other existing positions should then be examined to see if they can be converted to trainee-level positions or if their basic job requirements can be changed. Such efforts can create the training opportunities needed by employees in lower graded positions to satisfy qualification requirements. Training, of course, must be related to an identified target job and meet both the formal classroom and general or specialized experience requirements.

The agencies' failure to establish target jobs before training produced undesirable results. Employees completing upward mobility training had difficulty finding new and better jobs. For example, participants in one agency were to receive a bachelor's degree and a promotion or position with better opportunity after completing the program; however, positions requiring such training were often not available.

Another agency provided a year-round 4-year program leading to a degree. All courses were held after work hours except for the junior year when students attended classes during working hours. The program did not guarantee new positions for participants, and none were identified. However, an agency official said participants expected promotions and were bitter when only 5 of 16 were promoted to new jobs after completing the program. The employees' negative reactions caused the program to be terminated. Several other agency programs were terminated under similar circumstances.

CONDUCTING SKILLS UTILIZATION SURVEYS

Once target jobs have been identified, employee skills utilization surveys, which must consider both employee experience and education, become essential for identifying employee upward mobility needs.

As of December 1973, eight of nine agencies with programs had recognized the need to structure their upward mobility programs using employee skills and talent; however, only one had used skills survey data for this purpose. Four agencies did not use such data because the surveys were conducted after programs were implemented. In addition, as of December 1973, seven other agencies were structuring programs without using skills survey data. Information obtained in May and June 1974 indicated that skills surveys were still not being used to structure upward mobility programs.

Agency officials indicated that unreasonable time constraints, insufficient resources, and pressure to get programs operational prevented them from making surveys before implementing programs.

CSC's 1970 upward mobility guidance to agencies listed several actions, including conducting skills surveys, that could be taken to provide better upward mobility. However, because this guidance did not require a particular order for the various action items, it implied that skills surveys were not required before structuring an upward mobility program.

CSC, in July 1972 and October 1973 issuances on preparing EEO Affirmative Action Plans, provided guidance on conducting skills surveys and structuring upward mobility programs. This guidance showed the surveys and the programs as separate items, thus making them appear unrelated. The October 1973 guidance did not emphasize that a skills survey was integral to upward mobility programs, nor did it specify the importance of properly phasing activities in planning and structuring a program.

Skills utilization surveys
not performed properly

We identified nine agencies that conducted major skills utilization surveys. In five that had significant upward mobility programs operating as of December 1973, the surveys were conducted after the programs were operational. In the four agencies in which surveys were conducted but programs were not operational, the survey data was not used to structure the planned programs. And the surveys that were conducted were conducted improperly. The problems included

- some agencies' unwillingness to commit time and resources to conducting proper surveys;
- surveys limited to particular grade levels, geographic locations, or organizational levels;
- collection of noncomparable data from organizations within departments;
- data systems overburdened with unnecessary information;
- insufficient resources committed to collect, process, and properly use data;
- employees not properly informed of purposes for the surveys;
- employee expectations raised to unrealistic levels, causing increased employee frustration;
- time and resources required for other priority programs, such as the Executive Development Program and reduction in force programs;
- agencies' failures to validate survey data; and
- periodic and continual updating of surveys not included in the planning process.

A more basic problem was that agencies did not identify employees' work experience. Surveys of employees' underused skills must consider work experience, as well as education, as required by CSC Minimum Qualification Standards which exist for each Government job.

Four agencies that conducted skills surveys did not identify employees' experience as well as education or training. One agency, for example, had computer printouts showing grade level, length of service, and education of all its employees. Organizations in this agency were to compare these categories to identify underused employees, but no attempt was made to identify those who had qualifying experience for higher positions. Thus, this skills survey concentrated only on education, ignoring applicable skills or experience.

CHAPTER 3

CAREER COUNSELING

Career counseling, an essential element in all upward mobility efforts, attempts to match the employees' interests, skills, and potential to organizational needs by bringing together people and opportunities. It is designed to provide information and advice on ways employees can use their skills, acquire more job satisfaction, and choose the specialized training necessary for advancing in their chosen careers. Career counseling can assist agencies in better handling employees and coordinating training programs with employees' individual needs. Counseling is the "cementing" part of a total upward mobility program and must have the full support of all management levels.

In 1970 CSC suggested that agencies provide as many employees as possible with counseling and guidance. The counseling, it suggested, should concern occupational, training, education, and career goals related to the needs of the individual, the agency, and the Federal service and should include

- a realistic appraisal of the individual's interest and potential and
- complete information on job opportunities in the agency's career system.

It should also be related to the present and future needs of the agency and the Government.

CSC also suggested that career development plans be developed jointly by employees, qualified counselors, and the employees' supervisors.

Those agencies that had upward mobility programs did not match organizational needs with employee needs for upward mobility through counseling. Counseling had taken a "back seat" to such things as training because training was more visible and resources for counseling were generally not available. The few career development plans which had been prepared for employees in training and education activities did not reflect agency job needs.

Effective upward mobility counseling was lacking, primarily because

- information needed by counselors, especially on job availability, was not available;
- management had not committed adequate support and resources;
- counselors were not sufficiently trained;
- counseling priorities were not established; and
- adequate guidance was not provided.

AGENCIES NEED MORE INFORMATION
TO COUNSEL EFFECTIVELY

Career counselors must have specific information on both the agencies' and employees' needs if they are to effectively aid employees in finding better jobs. Listed below are the types of information which are necessary for counseling but which were not available at most agencies.

- Agencywide predictions of manpower needs.
- Existing or potential job vacancies, including newly created "bridge jobs."
- Data for college participants' use in deciding on major areas of study.
- Skills surveys (and access to them).
- Supervisors' appraisals of employees' potentials.
- Systematic procedures for contacting supervisors of participants.
- Supervisor involvement in counseling.

Lack of such information specifically caused termination of one large counseling program and generally caused employee and counselor frustration because counselors were unable to help employees find better jobs.

NEED FOR BETTER MANAGEMENT
SUPPORT OF COUNSELING

To be effective, counseling must have management support and resources, including the necessary manpower to perform the counseling. Management generally supported counseling when top management designated upward mobility as a high priority program and insured that the organization acted on its priorities. When top management did not recognize upward mobility as a high priority program, career counseling was, we believe, adversely affected. Management did not provide the funds or manpower to adequately conduct counseling activities; as a result, upward mobility training was not aligned with agency needs and employees were not given jobs that required their skills.

Officials in one agency, for example, stated that budget constraints, personnel ceiling restrictions, a reduction in force program, and reorganizations restricted effective counseling services. An agency official said most top-level managers did not consider upward mobility a priority program; this was reflected in resources committed for counseling services.

NEED FOR TRAINED COUNSELORS

The approaches to counseling varied from agency to agency and within agencies. In most cases, counseling was assigned to (1) supervisors, (2) training offices, (3) personnel offices, or (4) the EEO offices. Some agencies had organizationwide counseling services; others relied solely on supervisors. Regardless of who is responsible for career counseling, counselors must be (1) thoroughly familiar with personnel management regulations and procedures, (2) familiar with the organizational structure and its real employment needs, and (3) able to provide meaningful advice and assistance to interested employees. Counselors were lacking in all these areas and, as a result, were unable to assist employees with their upward mobility needs.

Employee hopes were raised unrealistically when counselor advice or promises could not be realized. For example, in one agency, although supervisors were usually the first persons an employee went to for counseling, they were unable

to assist employees in their upward mobility endeavors because they had little training in counseling and limited information on job availability and training activities.

Four agencies established a professional staff with some experience and training in counseling. Officials of one constituent agency informed us, however, that their career counselors did not have the required personnel management knowledge to advise employees and managers on upward mobility, career counseling, and career plans.

Another agency had career counselors lacking background in personnel procedures and knowledge of real agency employment needs. A constituent agency official said that counselors often provided incorrect job availability information which unrealistically raised employees' hopes.

NEED FOR AGENCIES TO ESTABLISH COUNSELING PRIORITIES

Agencies should establish counseling priorities when providing upward mobility counseling. Employees with unused skills should receive counseling priority over employees with untapped potential.

Most agencies had not established such priorities because employees with unused skills had not been identified through skills surveys. Such ineffective use of counseling resources prevented agencies from achieving maximum upward mobility results.

Officials of one large agency and participants and nonparticipants in its upward mobility program said the employees who should have been counseled were not. Employees claiming to have unused skills or training said they had never received career counseling. Agency officials admitted that counseling was primarily college oriented rather than career or job oriented. As a result, employees potentially qualified for better jobs were not counseled and employees desiring only to explore their untapped potential received first counseling priority.

NEED FOR CSC GUIDANCE ON COUNSELING

In its 1970 "Upward Mobility for Lower Level Employees: Suggested Goals and Actions," CSC recommended that agencies counsel as many lower level employees as possible. Although CSC outlined what counseling should include, it did not prescribe priorities or personnel, resources, or information needed for counseling.

CSC officials acknowledged these deficiencies and stated they had not issued any guidance on upward mobility counseling since 1970 but that specific guidelines would be issued soon.

CSC's June 1974 upward mobility guidance discussed the need for agencies to determine the supportive services needed to design a career counseling delivery system but did not provide specific information on career counseling.

CHAPTER 4

SELECTION OF PROGRAM PARTICIPANTS

After an agency decides to establish upward mobility training programs for employees, it must determine how to realistically and fairly select the candidates for these programs. The concept of upward mobility implies that the program prepare the best qualified employees for promotion. The credibility of an upward mobility program depends greatly on selecting, on the basis of job-related criteria, the most capable employees to perform the particular jobs for which they are being considered to convince employees that the program is fair and equitable.

We found that

--a need existed for preselection counseling and career development plans and

--agencies did not follow established selection procedures or use supervisors in the selection process.

NEED FOR PRESELECTION COUNSELING

Preselection counseling provides a means of assessing employee desires and abilities before selecting them for training and education activities. Agencies with upward mobility training or education components generally had not provided preselection counseling to participating employees. This resulted in employees who did not need training being enrolled in training activities and employees in need of training not being enrolled. Lack of preselection counseling, we believe, also contributed to the high drop-out rates experienced by agencies with formal training programs.

In many instances, agencies may find that training and education components are needed in the upward mobility program to enable employees to achieve their potential. Employees planning to participate in training and education should know as much as possible about the content and purpose of the programs. Their skills and training, career desires, and potential should be carefully assessed and a

determination made regarding their need for and ability and desire to participate in a training or education activity.

Officials of at least two agencies and employees of one large agency having no preselection counseling thought some sort of preselection screening was needed. They said employees entered programs without knowing details and failed to benefit. For example, some employees applied out of curiosity while others mistook the program's purpose. One employee did not realize he would have to take certain "required" courses in the college component and said he only wanted to take some data processing courses. Another employee took a college math course to help her children with their schoolwork.

One agency experienced a dropout rate of about 40 percent in its college training component. Most employees who dropped out had taken only a few courses. Most of the reasons they cited for dropping out could have been detected, in our opinion, in preselection counseling sessions. Preselection counseling is needed to insure that employees participate in training related to agency and employee needs.

CAREER DEVELOPMENT PLANS NEEDED BY MANY EMPLOYEES

A career development plan outlines a job progression for an employee, including the training and experience required to qualify for a designated target job. CSC guidance suggested developing such plans for employees engaged in certain training and education activities. However, the few employee career development plans that were prepared were unrealistic and unrelated to agencies' needs.

For example, at one agency only 10 of 116 employees interviewed who were enrolled in upward mobility training programs had career development plans. Agency officials said they were reluctant to prepare the plans because of a lack of guidance and information, particularly in the college component. Several constituent agency officials believed career development plans would only further frustrate employees and take time away from other more important counseling activities. In addition, there was no way

to insure that employees would be selected for the specified target jobs or even that they would receive the designated training. Another problem these officials cited was that employees would change job series to obtain a promotion and thereby invalidate the career plan.

One constituent agency had career development plans for all employees enrolled in the college component. Agency officials said, however, that the plans were unrealistic because they were prepared "in a vacuum" and did not relate to projected needs of the agency. As such, the career plans could only further frustrate employees.

NEED FOR AGENCIES TO USE ESTABLISHED SELECTION PROCEDURES

Federal personnel regulations prescribe the use of competitive selection methods and job-related selection criteria for selecting employees for advancement or advancement-related training. Some agencies were not doing so.

Competitive selection methods not used

Federal personnel regulations require competitive selection for all advancement training. Section 410.302, title 5, Code of Federal Regulations, provides that the merit promotion program established by the head of an agency, in accordance with CSC standards and requirements, under authority of section 355.103 of the same chapter, shall be followed in selecting career or career-conditional employees for training that is given primarily to prepare trainees for advancement and that is required for promotion.

However, we do not interpret this regulation as requiring strict adherence to merit promotion procedures in selecting employees for all upward mobility training; that is, training which does not prepare them for advancement and which is not required for promotion. Training falling into this category would be training for remedial or self-improvement purposes. Several upward mobility program selection methods, however, were noncompetitive. As a result, the best qualified employees were not always selected for the various programs, which adversely affected their credibility and contributed to high dropout rates.

For example, most employees of one large agency enrolled in its largest component, the college training program, were selected noncompetitively because certain employee groups wanted all employees to have an equal chance without management interference. The employee groups claimed this would lend credibility to the program. However, the agency's noncompetitive selection procedures resulted in many employees believing less qualified employees were selected. This caused employees to question the credibility of the program, and the agency experienced a particularly high dropout rate.

CSC informed this agency in August 1973 that its selection method for its college training program violated basic merit principles and would have to be discontinued. CSC had previously informed the agency that merit promotion was crucial to the success or failure of upward mobility efforts. An official of another constituent agency also strongly opposed the use of these noncompetitive selection methods.

Job-related selection criteria not used

The Government's Merit Promotion Program prescribes the method for evaluating employees' job performance potentials. The evaluation criteria must be job related. CSC also stressed that the job-element method be used in evaluating employees for new jobs. We found six agencies that had upward mobility components offering employees better job opportunities as well as college training. Employees selected for these components were promoted to new jobs or placed in positions with better promotion potential. Agencies, however, did not always use job-related criteria to select employees for these job-related components. As a result, in many instances less qualified employees were placed in jobs offering better opportunities and better qualified employees were excluded from these jobs. These actions possibly violated merit promotion principles and program credibility was severely affected.

For example, one agency had a 3-year program combining training in a new job with college training, resulting in both a professional position and a degree. Several of the constituent agencies selected employees for this program

without first identifying the target jobs. Selection was based on panel interviews rather than job-related criteria. This damaged the program's credibility, since several of the agency's lower level employees believed that selection depended on how well a person could sell himself orally rather than on who was most qualified for the job. Potentially more qualified employees were not selected, and, since further promotions were based on the competitiveness of the initial selection, merit promotion principles may have been violated.

One of its largest constituent agencies informed agency officials, shortly after the 3-year program began, that many elements of the selection process were not job related and had little to do with determining the most qualified people. The requirements of a brief essay on career objectives, three letters of reference from professional employees aware of the candidate's potential, and an interview based on non-job-related criteria were particularly noted as poor selection criteria. This selection method seemed to discourage participation, especially by minorities. The need for letters of reference from professional employees tended to exclude employees who had never worked with or had little contact with professional employees. The constituent agency suggested that the agency make more use of job-element appraisals, which would better measure abilities needed for the target job.

A constituent agency of another large agency had many wage board employees covered by craft union contracts which in many instances specified that the key criterion for promotion was job seniority. This hampered upward mobility efforts because it was virtually impossible to select and promote highly qualified, underused employees until they met union seniority criteria.

SUPERVISORY INPUT NOT USED IN SELECTION
PROCESS FOR UPWARD MOBILITY PROGRAMS

CSC recommended involving managers or supervisors in selecting participants for the programs and asserted that, without their participation--especially their employee appraisals--career planning would not be successful. At

least three agencies, however, were not using supervisors or their appraisals in the selection process. Program credibility suffered when supervisors realized that poorer quality employees were sometimes receiving opportunities while better qualified employees were passed over.

A CSC official said merit promotion principles should be used when selecting employees for the training programs. If agencies properly structured upward mobility programs, target jobs and merit principles would be required when selecting employees for target jobs. The use of supervisory appraisals, along with other evaluation criteria, including experience and training, performance, awards, potential for advancement, and outside self-development efforts, is inherent in the use of merit principles.

One agency, for example, in its college training program, gave supervisors no role in selecting participants. Some agency officials said that supervisors were not included because many employees believed supervisors had previously discriminated against nonprofessionals and minority group employees.

Supervisors were concerned, however, because they had no control over who was selected, especially employees with marginal job performance. One employee said she knew a person who was planning to retire who was selected for the program. The supervisor could have identified this as a factor in selection.

Supervisors often told us the selection procedures were a major program weakness and suggested this as one of the areas most needing improvement. Over 40 percent of the supervisors interviewed believed they should have been involved in the selection process. Moreover, supervisors' ratings should have been used as indicators of employee potential.

CSC's June 1974 guidance stressed the importance of participants' selection, including the application of merit principles, in the upward mobility process.

CHAPTER 5

PROGRAM REVIEWS AND EVALUATIONS

Sound management practice dictates that programs have built-in mechanisms for self-evaluations and be subject to periodic independent reviews. Although CSC guidance frequently referred to the need for program review and evaluation, neither the agencies nor CSC had made reviews of sufficient depth to determine the accomplishments, problems, or costs of the Government's upward mobility programs.

AGENCY EVALUATIONS OF UPWARD MOBILITY

Executive Order 11478 states that each agency head is responsible for providing for a system in the agency for evaluating the effectiveness of the required actions. CSC, in a letter to agency heads, said that upward mobility efforts must be a large part of their EEO reports. Agency headquarters and field activities must provide for monitoring and evaluating the actions outlined in the agencies' annual EEO Affirmative Action Plans, including upward mobility efforts. One section of these plans deals with agency accomplishments, explaining (1) whether actions in the last plan were accomplished and, if not, why and (2) the results of these actions. In addition, for upward mobility training and education programs, agencies are required to report progress in reaching program objectives.

Evaluations of upward mobility programs not conducted by most agencies

Our review at 19 agencies disclosed that most had not evaluated upward mobility actions. As noted before, 10 agencies did not have significant programs. Those that did had generally not determined why the programs were not achieving real upward mobility. Some agencies conducted limited evaluations of certain components or areas of upward mobility programs.

Planning not done by agencies

Without program planning, effective evaluations cannot be made. None of the agencies reviewed adequately planned their upward mobility programs or identified the problems. As a result, none reported or even knew (1) the extent to which upward mobility actions were meeting the requirements of the Executive order, (2) whether more or less resources were needed, or (3) whether their efforts were even helping to improve upward mobility.

Agency officials believed the main reason for the lack of program reviews was that agencies were primarily interested in implementing, as fast as possible, programs which were highly visible to employees as evidence of agency commitment to upward mobility. In other agencies, upward mobility programs were just getting underway, so there was little to evaluate.

Agency evaluations conducted were limited

We did identify some internal reviews which attempted to show upward mobility achievements and problems. In general, however, evaluations were limited to one small aspect of the overall program.

One constituent agency, for example, evaluated the upward mobility program and presented a report to the agency in June 1973. The report assessed the relative strengths, weaknesses, and impact of the constituent agency's upward mobility activities. It compared the original purpose and goals of the various components to the current status and actual effects. On the basis of this evaluation, the constituent agency suggested new directions for future efforts. This was the only constituent agency within the agency to conduct such an evaluation.

Another example of a limited agency evaluation was a review of upward mobility in the agency's regional offices during the fall of 1972. This review was made to evaluate progress in upward mobility in the regions and to identify problems and suggest measures to enhance the regional program. The review covered such areas as headquarters

guidance, management support, employee attitudes, selection for programs, career systems, counseling and guidance, and education and training, but it did not show the extent to which upward mobility was being achieved.

CSC EVALUATIONS OF UPWARD MOBILITY

As of December 1973, CSC had not evaluated the accomplishments, problems, or costs of agency upward mobility programs. Neither CSC's EEO plan evaluators nor its personnel management evaluators had assessed the extent to which programs had efficiently, effectively, and economically taken the upward mobility actions called for in the Executive order or the EEO Act because CSC

- lacked or did not use effective and valid criteria to assess upward mobility programs,
- had not established a baseline against which to measure upward mobility progress, and
- did not use meaningful or accurate statistics to measure upward mobility results.

Information provided by CSC, in responding to this report in December 1974, indicated that the evaluation of upward mobility programs continues to be one of the areas most in need of improvement.

CSC needs effective and valid criteria

CSC officials said effective criteria to accurately assess upward mobility programs were lacking. According to one official, until a system to track upward movement of employees was developed (which was at least 2 years away), the agencies would have to do the measuring, something they had not yet done.

However, CSC had not enforced requirements that agencies furnish accomplishment reports with their EEO Affirmative Action Plans. Thus, it was difficult for CSC to know whether an agency followed through on the previous year's plan.

CSC's EEO plan evaluators judged upward mobility plans primarily by whether agencies established training and education programs. Agency upward mobility problems must be identified first, however, and training programs may not be necessary to solve the problems identified. As a result, CSC's criteria did not measure real upward mobility progress.

Need for CSC to establish a baseline
to assess upward mobility progress

In August 1970 a CSC task force recommended a system to evaluate results of agency upward mobility programs and:

- Concluded that the ultimate output of the programs should be an increase in promotions among the target population, particularly from lower skilled to higher skilled occupations.
- Identified indicators for judging the success of agency upward mobility programs and information sources to provide the indications.
- Recommended that CSC assemble a first status report on upward mobility as a basis for evaluating future results.

As of December 1973 CSC had not prepared a status report; therefore, it did not have a baseline for evaluating and comparing the impact of agencies' upward mobility efforts. As of June 1974 we noted no improvement in this area. Further, CSC, in responding to this report in December 1974, did not comment on this matter.

Need for CSC to use meaningful statistics
to measure upward mobility results

CSC's primary source of raw upward mobility statistics is a semiannual report entitled "Minority Group Employment in the Federal Government." The report highlights changes in such employment since the last report. It does not show across-the-board increases for all employee groups or what contributed to the increases in certain grade groupings.

The statistics also do not show whether the increases were the result of outside recruitment or advancement of existing employees. Only the latter reflects upward mobility.

CSC's Bureau of Management Information Systems can produce some of the dynamic employment statistics essential for measuring upward mobility progress. For example, it can show the number of employees in technician and other development positions, the ratio by occupation of jobs filled by promotion and reassignment to those filled from outside, and the rate of personnel changes from low- to high-skilled occupations. The Bureau has used a 10-percent sample of employees to derive raw data, but this could be expanded to 100 percent when CSC expands its Central Personnel Data File to include EEO information. As of June 1974, CSC's Office of Federal Equal Employment Opportunity had still not requested that data formats needed to identify upward movement in the Government be included in modifications to the data file. CSC, in responding to this report in December 1974, did not indicate whether the data formats were yet available.

CHAPTER 6

LIMITED PROGRAM SUCCESS

Some agencies have achieved limited success in their upward mobility programs. These few successes indicate that upward mobility can be an effective mechanism for providing employees in limited advancement jobs opportunities to move into jobs that more fully use their skills and talents.

One agency's upward mobility program provided lower level upward and lateral movement throughout its organizational structure. The program did not include college training. For lower grade employees with potential, a training program provided a means through which employees could be competitively selected and trained for career fields unrelated to their past occupations. Once the low-grade employee achieved the technician level under this program, he could then be considered for another program, which provided career development and advancement opportunities to professional and technical employees from grades GS-7 through GS-15. Each program appeared to provide effective mechanisms whereby "dead-ended" employees with potential achieved additional career opportunities.

From program inception in early 1971 to October 1973, almost 150 employees of this agency had participated. These employees, who had been in jobs offering little if any advancement potential, were given new opportunities more fully using their skills and talents. The program's success was limited, however, because manpower needs were unknown and this limited the number of jobs that could be used for upward mobility. Existing employees' skills were not identified agencywide.

Another agency also had a small successful program in one of its bureaus. Agency personnel officials perceived that establishing a large formal training program would delay implementation; consequently, they used on-the-job training for upward mobility. The program competitively selected employees for 120-day detail to the bureau's claims division. Those selected who successfully completed the detail assignment were permanently reassigned as claims examiners (GS-11 is the journeyman level for this occupation).

Since the beginning of the program in fiscal year 1972, about 35 employees have been moved from "dead-end" positions to the claims examiners job series.

Another agency established a program which allowed employees in four paraprofessional positions to "bridge" into four corresponding professional positions. The program included both on-the-job training and in-service formal training sessions. Entry into these programs was normally at the GS-4 level. In fiscal year 1973, 225 employees moved from these paraprofessional positions into professional occupations. This program demonstrates the value of matching technician jobs with professional jobs to create career pathways for employees who could not ordinarily advance into the professional jobs.

CHAPTER 7

CONCLUSIONS AND RECOMMENDATIONS

Before issuing this report, we discussed with CSC officials the need for improving CSC upward mobility guidance to agencies. We pointed out that past guidance had not adequately discussed program planning, including the identification of target jobs, or skills surveys and that new guidance, stressing what we believed were the major causes for the status of existing programs, would contribute greatly to improving these programs. We also advised CSC that its past guidance did not discuss the sequencing of planning actions.

In June 1974 CSC issued new upward mobility guidance (Federal Personnel Manual Letter 713-27, dated June 28, and CSC Bulletin 410-83, dated June 26) which addressed many areas of the generally unsuccessful programs. The new guidance stressed the critical need to have proper program planning, to sequence planning actions, and to conduct skills utilization surveys before establishing upward mobility programs. The guidance also addressed the importance of the selection of participants, including the application of merit principles, in the upward mobility process.

CONCLUSIONS

We believe that CSC's June 1974 upward mobility guidance should aid Federal agencies in establishing effective programs or in modifying existing programs. However, CSC still needs to:

- Stress the importance of agencies' determining the extent of their upward mobility problem before planning and initiating programs.
- Monitor actions planned or taken by department and agency heads in response to its June 1974 guidance.

CSC guidance also should stress the need for agencies to give counselors essential information on present and projected job availability and manpower needs and to establish counseling priorities. Its guidance has not provided the necessary detail to plan for and implement effective

counseling services. CSC acknowledged the deficiencies in its counseling guidance and expressed the hope that new guidance would correct those deficiencies.

CSC must monitor the methods agencies use to select upward mobility program participants to see that they comply with its June 1974 guidance.

Finally, CSC and the agencies have not established an effective system for identifying and evaluating the status of agency upward mobility programs and progress made in achieving upward mobility. We believe effective program evaluation is essential because of the substantial amount of funds and manpower resources being expended on upward mobility programs.

RECOMMENDATIONS

We recommend that the Chairman of CSC:

- Provide more detailed guidance to department and agency heads on the importance of identifying the need for upward mobility programs as a first step in the planning process.
- Closely monitor actions planned or taken by department and agency heads in response to CSC's June 1974 guidance on upward mobility, particularly actions regarding top management commitment, proper program planning, and conducting skills utilization surveys.
- Issue definitive counseling guidance to department and agency heads.
- Closely monitor actions planned or taken by department and agency heads to insure that (1) job-related criteria are used when selecting participants, (2) upward mobility program participants are selected in accordance with merit principles, and (3) supervisors are involved in the selection process.
- Enforce existing requirements that departments and agencies report upward mobility accomplishments; establish and use valid criteria to assess upward

mobility progress; and develop a means by which upward mobility progress can be measured and communicate it to department and agency heads.

CHAPTER 8

AGENCY COMMENTS AND OUR EVALUATION

CSC COMMENTS

CSC stated (see app. II) that, while much has been done regarding upward mobility, more remains to be done and that it will continue to work with the agencies, whose needs vary widely and who must meet a number of priorities within the constraints of limited resources. CSC also said it would continue to improve its guidance and monitoring of upward mobility programs to assist agencies in meeting commitments through effective planning, training, and counseling.

According to CSC, agencies did not always have sufficient leadtime to do the indepth program planning considered desirable.

CSC stated that our report contains a number of findings and conclusions which are no longer current but, in fact, describe conditions which existed as long as 2 years ago. It maintained that, as a result of its guidance and followup visits with programs' officials, agencies have made considerable progress in planning and administering upward mobility programs.

CSC stated that fiscal year 1973 was the first year of operation under the EEO Act of 1972 and, while some agencies were able to generally assess their needs, most had not been able to commit the staff or funds necessary to systematically assess or analyze in depth the problems and alternative solutions.

According to CSC, many of the specific conclusions and recommendations in our report had already been addressed in its guidance. CSC also said its upward mobility guidelines have consistently stressed the essential role of counseling in career development and have suggested to agencies that they provide counseling and guidance to as many lower level employees as possible.

COMMENTS OF OTHER AGENCIES

We conducted closeout conferences at 10 Federal agencies at which we discussed at length our review determinations. As a result, we received both written and oral comments from seven agencies (the Departments of Agriculture, Commerce, the Interior, Justice, Housing and Urban Development, the Air Force, and the Army) and oral comments from three other agencies (the Departments of Health, Education, and Welfare; the Navy; and Transportation) between May 1974 and January 1975.

Agencies generally agreed with our review determinations and with the impact these determinations had on both operational and planned programs. Those agencies with operational programs indicated that modifications would be made or had been made to their programs and, in some instances, provided milestones for effecting program changes. Some agencies, though agreeing with our determinations, expressed concern over the speed with which their programs could be redirected because of the advanced stage of the programs and the effort involved in modifying them. Agencies planning programs provided us with statements of objectives, often quite specific, regarding mobility program plans, and three agencies provided recent guidance on upward mobility.

In summary, though the agencies generally agreed with our review determinations and indicated that programs would be redirected, modified, or instituted with clearly stated objectives and plans, some were concerned about the ability to do all that was necessary immediately because of resources problems or because of the impact of such actions on current program participants.

OUR EVALUATION

All information in our report was current as of June 1974 and some includes consideration of agencies' plans for later periods of time. In addition, information on the programs of four agencies was current as of January 1975.

We recognize that agencies are continually improving the planning and administering of upward mobility programs and that CSC guidance has addressed many of our conclusions

and recommendations; however, more needs to be accomplished to improve program implementation and operation.

We do not agree that fiscal year 1973 was the first year of upward mobility operations. Most of the nine agencies with significant programs had them operating before then in response to Executive Order 11478.

We agree that CSC has stressed the importance of counseling to agencies; however, its guidance needs to be more definitive and specific regarding the nature of the counseling agencies should provide.

Agencies' actions in initiating, replanning, or actually changing programs indicated that improvement is taking place.

CHAPTER 9

SCOPE OF REVIEW

To identify problems in implementing upward mobility programs and to assess how effectively the programs were promoting upward mobility, we reviewed the upward mobility programs of 19 Federal departments and agencies. We reviewed programs in operation through December 1973 and program plans for fiscal year 1974. We also obtained updated information during May and June 1974 and again in January 1975. These departments and agencies employ about 92 percent of the Federal civilian work force.

We also examined CSC's policies, procedures, and guidance issued to agencies on upward mobility as well as CSC and agency program evaluation procedures.

We also obtained employees' reactions to the programs through interviews,¹ reviewed in detail a selected number of established programs, and met with agency and CSC officials to obtain information on program implementation and management procedures.

¹We conducted 175 interviews of randomly selected employees and supervisors.

DEPARTMENTS AND AGENCIES WHEREGAO REVIEWED UPWARD MOBILITY PROGRAMS

Department of Agriculture

Department of the Air Force

Department of the Army

Department of Commerce

Department of Health, Education, and Welfare

Department of Housing and Urban Development

Department of the Interior

Department of Justice

Department of Labor

Department of the Navy

Department of State

Department of Transportation

Department of the Treasury

Civil Service Commission

Defense Supply Agency

Environmental Protection Agency

General Services Administration

National Aeronautics and Space Administration

Veterans Administration



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IN REPLY PLEASE REFER TO

YOUR REFERENCE

Mr. Forrest R. Browne
 Director
 Federal Personnel and Compensation
 Division
 U.S. General Accounting Office
 Washington, D.C. 20548

JEC 23 1974

Dear Mr. Browne:

Thank you for the opportunity to comment on the draft General Accounting Office report of upward mobility programs conducted by Federal agencies during 1973. We appreciate the attention you have given this vital program and agree in your assessment that the program has shown early success.

As a backdrop for our comments in this letter, we think it is important to note that the planned effort at upward mobility on a government-wide basis is relatively new. Our issuances in 1970 in support of Executive Order 11473, which first established upward mobility as a part of the equal employment opportunity program, gave agencies broad guidance and included guidelines for target job identification, employee counseling, selection procedures and other matters relevant to upward mobility to which your report refers. Before many of these initial efforts could be fully realized, Public Law 92-261 was enacted which required that all agencies establish upward mobility programs as an integral part of their equal employment opportunity affirmative actions. To implement the law, new criteria and new guidelines were imposed on agencies for immediate compliance. Because of the need to move rapidly, there was not always sufficient lead time for agencies to do the in-depth planning which we and they would have considered desirable.

For example, to implement the law, we required agencies to develop immediate upward mobility plans as part of their equal employment opportunity actions under P.L. 92-261. During FY 1973, the first year of operation under the new law, we reviewed over one thousand agency upward mobility plans. It was clear to us that while some agencies were able to make general assessments of their needs, most had not had an opportunity to commit staff or funds necessary to conduct systematic assessments or in-depth analyses of problems and alternative solutions.



1883-1973

MERIT PRINCIPLES ASSURE QUALITY AND EQUAL OPPORTUNITY

The agency upward mobility programs which were reviewed by GAO staff and which are described in the report are largely products of those plans formulated in 1972 as a result of the requirements of the law. The report, therefore, necessarily contains a number of findings and conclusions which are no longer current but, in fact, describe conditions which existed as long as two years ago.

Since 1972, and as recently as June 1974, we have issued to agencies additional guidance on upward mobility which, as your report points out, addressed many of the areas which were of concern to GAO. The latest instruction, FPM 713-27, dated June 28, 1974, provides a working definition of upward mobility and prescribes requirements for upward mobility plans developed by departments and field activities. It stresses the need for central coordination of an agency-wide planning effort and lists the roles and responsibilities of EEO staff, personnel specialist, counselors, trainers, supervisors, and others in the planning process. The guidelines further assist agencies in identifying target positions, assessing employee potential, and designing selection, training, and counseling components. Additional FPM publications on manpower planning, job restructuring, training agreements, and evaluation have also been distributed to agencies. While the preparation of much of this guidance was begun prior to the GAO study, your staff was kept informed of its development through subsequent stages and advised of its direction and emphasis. Our plans to issue further guidance, during FY 1975 have also been discussed with your staff.

As a result of our published guidance and follow-up visits with program officials, agencies have made significant progress in planning and administering upward mobility programs. Our reviews of 1974 and 1975 plans shows marked improvement in agency planning efforts, particularly in their attention to the integration of upward mobility with other actions designed to overcome problems relating to equal employment opportunity.

Agencies' analyses of current problems have produced more clearly stated objectives. Agencies have assigned specific action items to responsible officials, and have established more realistic timetables supported by top management commitment. Agencies have profited from their experiences and have modified early approaches to upward mobility implementation. Heads of several major departments and agencies have, in addition to meeting basic plan requirements, issued explicit statements of commitment and detailed program guidance to field installations.

We find a marked increase in the involvement of managers, supervisors, counselors and classifiers in the planning process. There is evidence of better central coordination of agencies' total upward mobility efforts. There is expanded exchange of information among agency planners and much evidence of cross-fertilization of ideas and approaches.

We find that agencies have a clearer understanding of the purpose, scope and concept of upward mobility and are better able to communicate these to employees.

We are encouraged that many of the specific conclusions and recommendations listed in the GAO report have already been addressed by our guidance to agencies. For example, the report cites the need for CSC to stress the importance of planning. This we have done. FPM 713-22, issued in October 1973, speaks directly to assessment of problems as "the first step in action plan development." It contains minimum requirements for an assessment and explains how the results of its analysis should be reported. In training workshops, we place further stress on this vital step in planning. FPM 713-27 is devoted almost entirely to effective planning for upward mobility and prescribes the sequential steps agencies should follow in the planning process. As part of these guidelines, a planning chart recommends the process and the products of each phase of upward mobility planning from the assessment of manpower needs to monitoring and evaluation.

The report also calls for CSC to monitor actions planned or taken by agencies. This we do by evaluating upward mobility plans submitted in accordance with criteria listed in our guidelines which include reports of program accomplishments. We also review agency programs during technical assistance visits with particular emphasis on effective planning for merit based selection procedures. Since December 1973, we have conducted ninety-two such monitoring sessions with agency officials in the Washington metropolitan area. In-depth reviews of upward mobility programs are conducted during all EEO evaluations. CSC Internal Letter 273-24, dated October 11, 1974, gives particular guidance to evaluators in their review of agency actions taken in response to our guidelines. Evaluation report findings are fed back to program managers for appropriate follow-up.

The report states that better guidance should be provided to agencies regarding counseling services. Our upward mobility guidelines have consistently stressed the essential role of counseling in career development. We have suggested to agencies that they provide counseling and guidance to as many lower level employees as possible and that such counseling include a realistic appraisal of employee interest and potential, complete information on job opportunities within the agencies' career system, and full knowledge of educational, training and developmental opportunities available. Further, we urge that agencies provide a full range of counseling and guidance services both within and outside of supervisory channels. FPM Letter 713-27 calls for counselors to be included on upward mobility planning committees to ensure that they are aware of job opportunities and can assist in development of employee assessment and selection procedures. We believe that counseling for upward mobility must be an integral part of an agency's total

career development program rather than a separately structured operational element, and our guidance to agencies will continue to emphasize this integrated role as a means to achieve upward mobility goals in a cost-effective manner.

The report indicates a need for improved guidance to agencies on the identification of current employee skills as a prerequisite to upward mobility planning. In July 1970, we issued CSC Bulletin 713-15, Identifying Underutilized Skills in the Work Force, which outlines eight major steps in conducting a skill utilization survey and suggests a variety of approaches and adaptations to particular agency needs and problems. The need for skills surveys was further stressed in FPM 713-22 and specifically listed in FPM 713-27 as a step in the upward mobility planning process. In addition, we have under development supplementary guidance which will include examples of the effective use agencies have made of skills survey information.

The report recommends that heads of departments and agencies be made aware that upward mobility is a high priority program requiring top management commitment. This we do, among other ways, through annual meetings with department under-secretaries and executive staffs, in which upward mobility is a recurring agenda item. In September 1974, we distributed to agency heads a complete statement of the Commission's principal, high priority objectives for FY 1975 which included the advancement of EEO through results-oriented Federal government-wide upward mobility programs. We received several responses from agency heads acknowledging the soundness of these priorities and supporting the initiatives we are taking.

[See GAO note, p. 41.]

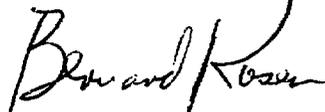
While much has been done, we realize that more remains to be done and we will continue to work with agencies whose needs vary widely and who must meet a number of priorities within the constraints of limited

resources. We will continue to improve our guidance and our monitoring of upward mobility programs to assist agencies in meeting their commitments through effective planning, training and counseling. We have identified performance indicators for the measurement of program achievement such as promotions and reassignments into occupational series which provide greater advancement opportunity. In assessing agency accomplishments, for the immediate future we intend to continue our analysis of agency achievement reports which are submitted annually and statistical data available from our Central Personnel Data File.

We are sure you share our concern, however, that extremely costly program requirements, uniformly imposed, could result in excessive demands on some agencies and cause a curtailment in the upward mobility effort. Upward mobility is an evolving, dynamic means to achieve sound management and employee objectives. It must not become an over-structured and excessively expensive process, but must continue to function as an integral part of each agency's staffing practice and must impact positively on its EEO program through application of merit principles. Therefore we must take caution against this vital program becoming a large and comprehensive system unto itself--rigid, and disproportionately costly in its demands on limited resources. Within broad program guidelines, each agency must have the latitude and flexibility to establish and expand upward mobility opportunities in a cost-effective manner.

Again, we appreciate this opportunity to review and comment on the findings of your survey. We hope that our remarks have given added value to your report and we look forward to its publication.

Sincerely yours,



Bernard Rosen
Executive Director

Enclosure

GAO note: Material deleted relates to matters presented in the draft report but revised in the final report.

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