

DOCUMENT RESUME

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[Survey of Effectiveness and Need for Equal Employment Opportunity Training at Region IV, Department of Health, Education, and Welfare]. B-70896. April 25, 1977. 5 pp.

Report to Charles Cain, Acting Regional Director, Department of Health, Education, and Welfare: Region IV, Atlanta, GA; by Marvin Colbs, Regional Manager, Field Operations Div.: Regional Office (Atlanta).

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A survey of Equal Employment Opportunity (EEO) training provided at Region IV, Department of Health, Education, and Welfare (HEW), focused on kinds of training, selection of participants, and evaluation of results. Findings/Conclusions: Two categories of training were provided: skills and orientation. Skills training was provided for individuals directly involved in EEO programs. Orientation courses, designed to provide knowledge of legal and policy requirements, provided for managerial and supervisory personnel. Because attendance was based largely on an individual's availability rather than need, less than 10% of 1,799 individuals designated for training in FY 1977, attended courses. Some part-time EEO principals were found to lack formal training and all lacked background in personnel administration. Full-time principals had more adequate background or training. Some supervisors did not receive EEO training, because it was not included in their supervisory course. Data on training from the management information system was incomplete and inaccurate. Although training at Region IV was available, regional coordination and control was lacking, and results were not properly evaluated. Recommendations: Procedures should be developed to identify persons requiring training, establish an annual schedule, provide for record maintenance, and evaluate training impact. (HTW)

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APR 25 1977

B-70896

Mr. Charles Cain
Acting Regional Director, Region IV
Department of Health, Education,
and Welfare
50 Seventh Street, N. E.
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Dear Mr. Cain:

We have completed our survey of Equal Employment Opportunity (EEO) training provided in Region IV, Department of Health, Education, and Welfare. The survey focused on the kinds of courses offered, selection of participants, and the evaluation of training results.

Although the region was making EEO training available to EEO principals, managers, supervisors, and other employees, we believe the program can be strengthened by:

- insuring that those designated for training receive it,
- developing reliable training data, and
- evaluating training results.

The need for EEO training was established by the EEO Act of 1972, Executive Order 11478, the Federal Personnel Manual, and HEW Instruction 713-1. The need for training employees--particularly managers, supervisors, and individuals directly involved in the EEO program--was also emphasized in the Region's affirmative action plan.

Two categories of training were provided--skills and orientation. EEO skills training was designed to improve the skills and knowledge of individuals--counselors, Federal Women's Program Coordinators, Spanish Speaking Program Coordinators, discrimination complaints investigators--directly involved in the Region's EEO program.

EEO orientation courses were designed to provide knowledge and understanding of Federal EEO programs--including laws, regulations, policies, program requirements--to supervisors, managers, and other employees. EEO orientation was usually given as a part of managerial and supervisory courses.



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In addition, training in personnel administration is given to EEO principals who have not previously received it.

COORDINATION AND CONTROL OF EEO TRAINING NEEDS IMPROVEMENT

Individuals designated for training did not always receive training because attendance was based largely on an individual's availability rather than on the need for training. Less than 10 percent of the 1,799 individuals designated for specific EEO training courses in the fiscal year 1977 training plan actually attended the courses. This resulted in cancelling several in-house training courses after making commitments with contractors to provide training.

We were told that the primary reason was that supervisors did not release from duty the designated individuals in order for them to attend the training courses.

Supervisors identified employees needing EEO training through an annual needs survey. In selecting employees, supervisors were instructed to prepare a listing of participants and courses based on both organizational goals and individual needs. These listings were used as a basis for the regional training plan. Supervisors were instructed to release from duty those employees designated to attend the training courses.

Training EEO principals

The regional EEO officer was responsible for making sure that EEO principals were adequately trained for their duties. We examined the personnel file and interviewed nine part-time and three full-time EEO principals and found that:

- Three part-time principals had not received any formal training for their EEO positions. One had been an EEO representative/investigator for about one year, one a Spanish-speaking program coordinator/EEO representative for about four years, and one a Federal women's program coordinator/EEO representative for about six months. The regional EEO officer said that counselors and investigators in particular should be trained prior to assuming their duties.
- None of the part-time principals had a background in personnel administration. Three of the nine had not received formal training in personnel administration, two had received eight hours each, one had received 16 hours, two had received 24 hours each, and one had received 40 hours.

--Two of the three full-time EEO principals had an extensive background in EEO and personnel administration. The third had attended several courses relating to her EEO position, and had received about 24 hours of formal training on the Federal personnel system.

EEO and training officials concur that it is particularly important to assure that part-time EEO principals are properly trained because of the large number, frequent turnover, and need for training in EEO when assigned.

The Federal Personnel Manual and Region's affirmative action plan recognized the need to provide training in EEO and personnel administration to EEO principals. Both the EEO and training officers felt that this training was especially important because few--if any--individuals are qualified in terms of experience or training at the time they are appointed to EEO positions--particularly part-time EEO positions. The EEO officer noted that while the need for skills training may be obvious, training in personnel administration is also important because EEO goals and activities must fit within the merit system and because most discrimination complaints are personnel related.

Training supervisors

Some supervisors did not receive EEO training because it was not included in a mandatory 80-hour supervisory course at the time they attended. Regional officials were not certain when the 4-hour EEO segment was added--possibly 3 or 4 years ago. They were unable to determine the number of supervisors who had not received the EEO segment because training records were not reliable.

We interviewed 13 supervisors about their EEO training experience. Six had never received EEO training and seven had received it during the past 3 years.

This problem was recognized in the region's fiscal year 1976 affirmative action plan, and an action item was included to conduct a survey to identify supervisors who had not received EEO orientation training. The regional training officer told us that this survey would be implemented about June 1976. On October 12, 1976, we were told that the survey had been completed, but the results had not been summarized.

NEED FOR RELIABLE DATA

We were unsuccessful in obtaining reliable training data from the Department's automated management information system because it was incomplete and inaccurate.

The regional training officer is responsible for administering a coordinated regional training program sharing with line management the responsibility for determining training needs and selecting employees for training. The regional EEO officer is responsible for assuring that EEO principals are adequately trained for their duties.

These officials, and the assistant regional director for administration and management, told us that a major problem in managing EEO training is the lack of reliable training data. The primary reason they cited for unreliable data is that constituent agencies do not always coordinate training needs through the regional training or EEO officers. In November and December 1975 the region issued memoranda to program heads and supervisors instructing them to follow established procedures for coordinating training needs through the regional training office--but the problem still exists.

Conclusions and Recommendations

In Region IV, EEO training was made available to EEO principals, managers, supervisors and other employees. Some training was not being reported to the regional training officer for review and approval. Likewise, agencies did not always submit training records for EEO principals through the regional EEO or training officers. Thus, the program lacked coordination and control at the regional level.

Neither the regional training office nor the regional EEO office maintained records identifying training needed or received by EEO principals, managers, and supervisors. Without reliable training data, there was no assurance that those who needed training received it.

We recommend that the regional director:

- Reevaluate existing training procedures for constituent agencies and develop new procedures as needed to: identify persons who should receive EEO training; establish an annual schedule for providing the training; and provide a system for maintaining adequate training records.

NEED FOR EVALUATING EEO TRAINING

Regional officials had not properly evaluated the results of EEO training provided to Region IV employees and thus did not know its impact on EEO.

The Federal Personnel Manual requires agency heads to evaluate the results of training programs to determine how effectively they are contributing to achieving agency missions and attaining management goals. At a minimum such evaluations should include analyses of:

- the extent to which specific training courses or programs produce desired changes in employee knowledge, skills, attitudes, or performance;
- the extent to which the training courses or programs that are provided cover the areas of greatest need; and
- the need for modification in the coverage or conduct of these training courses or programs to meet changing agency needs.

Department instructions require that regional personnel offices determine whether each training activity meets departmental and regional needs. Moreover, each region is responsible for evaluating the results of training. Objective evaluations of the impact of EEO training had not been made. Only employee self-evaluations--student critiques--were made. Although student critiques may assist in determining whether students were paying attention--increasing the possibility for learning--they do not provide an objective evaluation of course content or training results.

Conclusions and Recommendations

We believe that an effective evaluation of EEO training is needed in order to assess the impact on achieving EEO goals.

We recommend that the regional director develop a method for effectively evaluating EEO training as to the impact it is having on the achievement of EEO goals.

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We appreciate the cooperation and courtesy extended to us by your staff during our survey.

Sincerely yours,

MARVIN COLBS

Marvin Colbs
Regional Manager