

A Changing Workforce: Understanding Diversity Programs in the Federal Government



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H U M A N C A P I T A L S E R I E S

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The PricewaterhouseCoopers Endowment for
The Business of Government

F O R E W O R D

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On behalf of The PricewaterhouseCoopers Endowment for The Business of Government, we are pleased to present this report by Katherine C. Naff and J. Edward Kellough, "A Changing Workforce: Understanding Diversity Programs in the Federal Government."

Professors Naff and Kellough describe the origins and history of the concept of diversity. They explore the distinction between diversity and equal employment opportunity (EEO) and affirmative action (AA) programs. The authors argue that government should make a clear distinction between diversity programs and traditional EEO and AA programs created to address illegal discrimination in the workplace.

Their report builds on a 1999 survey by the National Partnership for Reinventing Government (NPR). Naff and Kellough examine the scope and nature of seven federal government agency diversity programs, including the National Institutes of Health and the National Institute for Standards and Technology. This report vastly increases our knowledge of how diversity programs and strategies are being implemented across the federal government. The authors describe how federal agencies can collect and analyze data to assess the impact of their diversity activities.

We trust that this report will provide new ways for the federal government to respond to a rapidly changing workforce and will assist agencies in creating diversity programs that fit their agency's resources, mission, and unique needs.

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EXECUTIVE SUMMARY

The increased entry of minorities and women into the American labor force in the 1980s and 1990s signaled a need for employers to change management practices and workplace norms that had been developed when the workforce in general, and upper management in particular, were dominated by white men. It was argued that organizations should take steps to ensure that their work environments were open to people from diverse backgrounds so that they would be able to attract and retain capable employees.

Efforts to implement these kinds of organizational changes eventually came to be known as “diversity management” programs or initiatives. Such practices are intended to transcend traditional equal employment opportunity (EEO) and affirmative action (AA) programs to change belief patterns and behaviors that may impose subtle, and often unintentional, barriers to the advancement of minorities, women, and others. The purpose is to help ensure that all people within organizations have opportunities to advance and prosper to the fullest extent that their skills and abilities will allow. Specific practices advocated by proponents of diversity management include the provision of training that emphasizes shared values among all employees, the development of mentoring programs, the sponsorship of advocacy groups, and a reexamination of organizational structures and management systems to identify and root out subtle barriers to equal opportunity. As affirmative action programs came under increasing attack during the 1990s, diversity management programs were seen as an alternative that could serve many of the same objectives without raising

as much opposition. To further increase its appeal, diversity came to be defined very broadly to encompass distinctions among people well beyond simple racial, ethnic, and gender categories.

Little has been written about the nature and scope of federal agencies’ diversity programs; this report helps to fill that void. We find that while slower to implement such activities than their private sector counterparts, by 1999 most agencies reported having diversity management programs in place, albeit with a great deal of variation in the precise nature of their programs. Many agencies, for example, had well developed programs comprised of many of the components advocated in the diversity literature, while others simply renamed their traditional equal employment opportunity and affirmative action programs.

To better understand the nature of this variation among federal organizations, we selected seven agencies for close analysis. We found that while many shared common features such as a broad definition of diversity and the provision of training, there are significant differences as well. For example, some require employees to attend diversity training while others make attendance voluntary. Some have multifaceted approaches that include mentoring programs, diversity councils, and action plans, while others have a much more limited scope.

One of the more interesting findings was that no agency had completed a systematic evaluation of its diversity management program, despite the government’s current emphasis on measuring program

performance and impact. We offer a means by which agencies could undertake a systematic analysis of the effectiveness of their diversity efforts. We suggest measures based on the relative likelihood of minorities and women to be promoted, dismissed, or to voluntarily quit their jobs, given their representation in an organization's workforce. The measures can be constructed for individual agencies and tracked across time. The report concludes with three specific recommendations:

- All federal agencies should develop and implement diversity management programs consistent with their resources, mission, and unique needs.
- Agencies should make a clear distinction between diversity management and traditional EEO and affirmative action programs.
- Agencies should gather baseline data to guide diversity program efforts and to serve as a means for continuous evaluation of the impact of their diversity programs.

Introduction

Two reports written by the Hudson Institute in the late 1980s forecasted major demographic changes in the American workforce over the next decade. The reports' predictions spawned the development of an industry of consultants who set about advising employers in how to adapt their management practices to a workforce that was becoming increasingly diverse in terms of race, ethnicity, gender, and other characteristics. The fear was that established practices, traditionally favoring the advancement of white men, would undermine the recruitment, retention, and advancement of women, minorities, and others "outside the mainstream."

A significant body of literature now describes and assesses the practices that are encapsulated under the rubric of what has come to be called "valuing" or "managing" this increasingly diverse workforce. The bulk of that literature, however, is focused on the private sector, even though the need to ascertain such activity in the federal sector is arguably greater, given the important role the federal government plays as the nation's largest employer and as a chief formulator and enforcer of equal employment opportunity policy.

The purpose of this report is to address that void in the literature by describing federal government agencies' diversity policies and programs. We begin by providing some background as to the genesis and meaning of the managing diversity enterprise. We then draw on a 1999 survey to describe the activities that federal agencies have utilized to more effectively manage their diverse workforces. We find that agencies span the gamut from doing very little in this regard to pursuing a wide variety

of measures. Our discussion then turns to an in-depth description of the state of diversity programs in seven federal agencies, selected in part, on the basis of their distinct approaches to managing diversity. We discuss the need for and demonstrate a means by which the success of diversity programs in federal agencies can be evaluated. This last component of the report is particularly important given the financial and political capital that agencies are investing in these efforts.

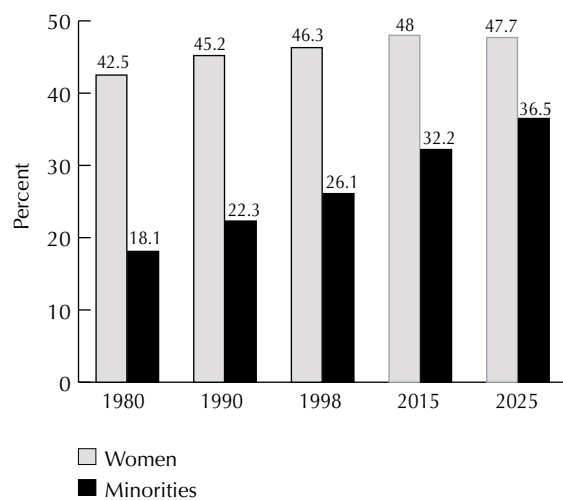
The Diversity Management Movement

The Hudson Institute reports are often cited as important catalysts to the managing diversity movement. The first, entitled *Workforce 2000*, was released in 1987 and addressed transformations in the civilian labor force (Johnston and Packer 1987). This report drew significant criticism because it appeared to overstate the extent to which white men would shrink as a portion of the labor force (Mishel and Teixeira 1991, U.S. General Accounting Office 1992, U.S. Merit Systems Protection Board 1993). Nevertheless, as can be seen in Figure 1, the workforce is becoming more diverse. The second Hudson Institute report, *Civil Service 2000*, completed a year later, focused specifically on federal employment and reached similar conclusions (Johnson et al. 1988).

These reports generated significant attention, in part, because they presented a number of observations in a rather ominous fashion. Of particular interest were the Institute's predictions that workplaces oriented toward men working and women staying at home would not accommodate the growing proportion of employed women, and that "[minorities] may have language, attitude, and cultural problems that prevent them from taking advantage of the jobs that will exist" (Johnston and Packer 1987, xxvi). These predictions induced a flurry of consulting activity and the emergence of a variety of books, videos, and other materials designed to sensitize employers to the different perspectives and needs of a more diverse workforce.

This was not the only catalyst boosting the managing diversity movement, however. At the same time, the political and legal climate was growing increas-

Figure 1: Female and Minority Share of the Civilian Labor Force, 1980–1998 and Projected to 2025



Source: Fullerton 1999, 10.

ingly intolerant of affirmative action, a vehicle that had been used for providing access to employment and promotions for women and minorities for two decades. The Reagan administration made opposition to affirmative action a core component of its electoral strategy. Following the election, the administration reduced the budgets of agencies with key enforcement responsibilities and filed lawsuits to challenge affirmative action agreements in local governments (Edsall and Edsall 1991). It has been argued that while the subsequent George H. W. Bush administration had promised a "kinder, gentler" approach, Bush was even more conservative on racial issues than his predecessor (Shull 1993).

The courts were also taking a conservative stand toward affirmative action in the late 1980s. In *Richmond v. J.A. Croson Company* (488 U.S. 489, 1989) the Supreme Court invalidated a minority set-aside program in the city of Richmond, Virginia. Justice O'Connor, writing for the Court, said that in the future the Court would apply a standard of "strict scrutiny" to such programs. The Court had historically applied a more lenient standard to federal race-conscious programs, deferring to Congress' judgment as to when such measures serve governmental objectives, but that position was undermined by *Croson* and completely reversed in a 1995 decision. In *Adarand v. Peña* (115 S. Ct. 2097) the Court ruled that federal programs, like those of state and local governments, must be subjected to strict scrutiny. Following that decision, the Justice Department mandated that all federal agencies review their policies and programs to ensure they would meet this stricter test.

Affirmative action has always been a controversial topic. In a 1996 poll by the Roper Center, for example, respondents were equally divided between those who said they support affirmative action programs that give preference to women, blacks, and other minorities (47 percent) and those that oppose those programs (49 percent). With a legal and political climate that was also making it more difficult to defend those programs, it is perhaps not surprising that organizations concerned about ensuring that minorities and women had equal access to jobs and promotions would look for other means to make that possible. That is what the managing diversity literature has promised to do.

Themes in the Emerging Literature

The first use of the phrase "managing diversity" is often attributed to former Harvard Business School Professor R. Roosevelt Thomas. His 1990 article in the *Harvard Business Review* began with the prediction: "Sooner or later, affirmative action will die a natural death. Its achievements have been stupendous, but if we look at the premises that underlie it, we find assumptions and priorities that look increasingly shopworn" (Thomas 1990, 107). Instead, Thomas argued, "The goal is to manage diversity in such a way as to get from a diverse workforce the same productivity we once got from a homogenous

The Legal Framework

The Civil Rights Act of 1964: Title VII is the major federal statute that prohibits discrimination in employment. Under the law, employers may not fail or refuse to hire, or discharge any individual, or otherwise discriminate against any individual with respect to compensation, terms, conditions, or privileges of employment on the basis of race, color, gender, religion, or national origin. In 1972, the law was extended to cover federal and other public sector employees.

Age Discrimination in Employment Act of 1967: Employers are prohibited from discriminating based on age.

The Rehabilitation Act of 1973: Federal employers are prohibited from discriminating on the basis of disability.

workforce, and do it without artificial programs, standards—or barriers" (Thomas 1990,112). Moreover, Thomas contended, diversity is not just about race, ethnicity, and gender. Rather, it includes other ways in which people differ from one another, including age, background, education, work role, and personality. Table 1, taken from the National Institutes of Health (NIH) Workplace Diversity Initiative home page illustrates the distinction that is often made between equal employment opportunity/affirmative action (EEO/AA) and managing diversity.

Thomas's notion that "diversity" is defined not just in terms of characteristics such as gender, race, and ethnicity, but rather encompasses all the ways people differ from one another is echoed in the expanding literature on diversity management (Thomas 1990, 1991; Norton and Fox 1997; Fernandez 1999; Slack 1997; Wilson 1997). The hope is that those who oppose affirmative action based on a belief that it benefits women and minorities at the expense of nonminority men will embrace diversity management efforts because they do not focus attention on simply race/ethnicity and gender. Note that under "Managing Diversity" in Table 1, the NIH emphasizes its focus on "all elements of diversity." NASA's Equal Opportunity and

Table 1: National Institutes of Health Definitions of EEO/Affirmative Action and Managing Diversity

EEO/Affirmative Action	Managing Diversity
Mandatory	Voluntary
Legal, social, moral justification	Productivity, efficiency, and quality
Focuses on race, gender, ethnicity	Focuses on all elements of diversity
Changes the mix of people	Changes the systems/operations
Perception of preference	Perception of equality
Short-term and limited	Long-term and ongoing
Grounded in assimilation	Grounded in individuality

Source: National Institutes of Health Diversity home page at http://oeo.od.nih.gov/diversity/managing_diversity.asp

Diversity Management Plan provides another example of this viewpoint. It defines cultural diversity as “simply that NASA employees are diverse because they bring a variety of different backgrounds, customs, beliefs, religions, languages, knowledge, superstitions, values, social characteristics, etc., with them to the workplace.... [In addition to racial and ethnic cultural groups] there are also class cultures, age cultures, gender cultures, and regional cultures to name a few” (NASA 1994, 3). By defining diversity so broadly, organizations such as NASA hope that all employees will support the program, rather than feel excluded from or offended by it.

Not all of the contributors to this literature embrace this expanded focus, however. Morrison (1992, 9) warns, for example, “The most frightening aspect of moving too hurriedly from affirmative action for targeted groups to promoting the diversity in everyone is that this becomes an excuse for avoiding the continuing problems in achieving equity for people of color and white women” (see also Caudron and Hayes 1997).

More recently, Thomas has stepped out in the forefront again by suggesting that even “managing diversity” is no longer relevant. He argues that despite their best efforts, American businesses are “little better equipped today to deal with the fragile threats of a multicultural workforce than they were in earlier days of overt racism. We have changed our vocabulary but not our behavior,” says Thomas (1996, xii). His solution is to develop an even broader definition of diversity: “any mixture of items characterized by differences and similarities” (Thomas 1996, 5).

In addition, in case the notion that organizations should accept that all employees are different from one another in some ways is not enough, this literature also goes to great lengths to state the “business case” for managing diversity. Note that the NIH chart (see Table 1) distinguishes the reasons for managing diversity from those in which EEO/AA were grounded. EEO/AA were justified on legal, social, and moral grounds. Managing diversity is justified based on grounds such as increasing productivity, efficiency, and quality.

In short, the focus of policies intended to create more equitable employment environments has shifted in many organizations in two fundamental ways since the late 1980s. First, an emphasis on legally mandated EEO and affirmative action programs has frequently been replaced or supplemented by voluntary efforts to “manage diversity” to promote equity. Second, the diversity management movement has defined itself as a strategy that includes everyone. The question now before us is to what extent have federal agencies actually embraced the diversity management movement. In order to address that question, we must first develop a fuller understanding of the specific strategies recommended by the managing diversity literature.

What Does It Mean to Manage Diversity?

The extensive literature on managing diversity takes a variety of forms, including empirical descriptions of organizations that are considered to be models

Table 2: Common Recommendations for Diversity Programs

Ensure management accountability	Management officials' performance ratings and compensation should depend in part on their success in achieving diversity-related goals (Morrison 1992, Cox 1994, Fernandez 1999, Wilson 1997, CAPS 1996, Dobbs 1996).
Reexamine the organization's structure, culture, and management systems	Selection, promotion, performance appraisal criteria, and career development programs should be examined for potential bias, and where necessary, be revamped (Norton and Fox 1997, Thomas 1996, Mathews 1998, Wilson 1997, Morrison 1992, Cox 1994, Fernandez 1999, Dugan et al. 1993, CAPS 1996, Fine 1995).
Pay attention to numbers	The representation of groups in various levels and occupations in the organization should be closely monitored (Morrison 1992, Norton and Fox 1997, Cox 1994, CAPS 1996, Thomas 1996). Wilson (1997) and Morrison (1992) also emphasize the importance of monitoring employees' perceptions of the organizational environment.
Provide training	Organizations should ensure that employees are taught about the importance of diversity goals and the skills required to work effectively in a diverse workforce (Cox 1994, Thomas 1996, Fernandez 1999, Chambers and Riccucci 1997, Wilson 1997, Hudson and Hines-Hudson 1996, CAPS 1996, Mathews 1998, Gardenswartz and Rowe 1993).
Develop mentoring programs	Mentors should be made available to employees as they can serve an important role in communicating organizational expectations to employees who are interested in advancement (Morrison 1992, Fernandez 1999, Cox 1994, Thomas and Gabarro 1999, Wilson 1997, CAPS 1996, Dugan et al 1993, Fine 1995).
Promote internal identity or advocacy groups	Organizations should encourage the development of formally or informally constituted groups representing specific categories of non-traditional employees such as women, African Americans, or gays and lesbians. Such representation can help mitigate the potential isolation of members of these groups and may provide leadership in resolving conflicts (Morrison 1992, Cox 1994, Thomas and Gabarro 1999, Dobbs 1996, Digh 1997; see Norton and Fox 1997 for disagreement with this approach). A variant of this approach is to establish "advisory" groups that include representatives from many distinct groups in the workforce (Wilson 1997, CAPS 1996, Fine 1995).
Emphasize shared values among employees, customers, and stakeholders	Organizations should recognize that, in many cases, their culture and structure reflect the orientation of Euro-American men, and they should work proactively to create a more inclusive climate, linking diversity to their business strategy (Fernandez 1999, Thomas and Gabarro 1999, Wilson 1997, CAPS 1996, Norton and Fox 1997).

in workforce diversity, summaries of “lessons learned” about managing diversity based on case studies or surveys of human resource professionals, and strategies for managing diversity advocated by consultants in the field. We draw from this literature in order to identify the explicit and implicit recommendations for steps organizations should take to create better climates for diversity. Those recommendations most commonly found in the literature include the broad suggestions displayed in Table 2.

It should be readily apparent that while those prescriptions share some of the tenets of traditional EEO and affirmative action programs, they also move beyond such efforts. Traditional EEO programs are primarily oriented toward protecting employees from legally proscribed discrimination and affording them the opportunity for redress should an action meeting the legal definition of discrimination take place. Traditional affirmative action programs are designed to increase the representation of underrepresented groups in various occupations and grade levels.

Managing diversity programs transcend those parameters by attempting to ferret out practices that work to the disadvantage of underrepresented groups whether those practices meet legally actionable definitions of discrimination or not. Examples of such practices might include “attitudinal and organizational barriers” such as the incommensurate access to developmental practices and credential-building experiences and narrow recruitment practices the Department of Labor (1991) identified in its report on the glass ceiling. As noted above, the diversity management literature calls for the organization to proactively examine selection, promotion, performance appraisal criteria, and career development programs for potential bias and, where necessary, to revamp them. Another example is that unlike traditional EEO programs that address discriminatory behaviors, proponents of diversity management programs also stress the importance of employee perceptions of organizational fairness. Finally, many managing diversity programs address demographic characteristics not addressed by traditional EEO/AA programs, such as language, geographic origin, and/or work style.

Diversity Management in the Federal Government

Civil Service 2000, the Hudson Institute report projecting the future for federal employment, suggested that the federal government also needed to take steps to be able to compete for its “fair share of the best qualified members of [the] changing workforce” (Johnson et al. 1988, 32). However, federal agencies were apparently slower to jump on the diversity bandwagon than their private sector counterparts. The U.S. Merit Systems Protection Board (MSPB) summarized its findings in a 1993 report on federal agencies by saying that overall, they “did not report any significant resource commitment or personnel program changes intended solely to address the changing demographic projections” (MSPB 1993, x). That most federal agencies did not heed the call to manage diversity until the mid-1990s may have been a function of not feeling the pressure to do so until the *Adarand* decision raised the standard under which federal affirmative action programs would be permitted. Moreover, by that time diversity management was widely acknowledged as a subfield of human resources management, and dozens of consultants were marketing their services (Kelly and Dobbin 2001).

A Survey of Federal Agencies

By 1999, however, agencies had become much more active with respect to diversity programs. That year, the Diversity Task Force established by Vice President Gore’s National Partnership for Reinventing Government (NPR) administered a survey to 160 federal agencies and departments. The survey asked federal organizations about the components of, and resources devoted to, any diversity initiatives they might have. Responses, in the form

of usable returned questionnaires, were obtained from 137 or 86 percent of the organizations surveyed. These included components from the 23 largest departments and agencies, as well as the U.S. Postal Service and many of the smaller agencies. Collectively, these organizations employ more than 80 percent of the federal government’s civilian workforce. The collection of data at the subagency level is particularly fortunate. Many examinations of differences among federal agencies on various dimensions previously have had to rely on information aggregated at the full agency or department level, necessarily overlooking the dissimilarities among subagencies within larger departments. As it turns out, there is quite a bit of variation in federal agency approaches to meeting the needs of a changing workforce.

The NPR survey began by asking the EEO directors and other officials completing the survey whether their agencies had undertaken a diversity initiative. More than 88 percent, or 120, of the 137 agencies answered “yes,” indicating, as expected, that an overwhelming proportion of federal organizations had such efforts—at least in some form. Perhaps it is more interesting to note, however, that after years of attention given to the issue of diversity, 16 organizations, or nearly 12 percent of the total, reported that they had not undertaken a diversity initiative. (One agency didn’t respond to the question.) Four of those 16 indicated that they were planning to develop a program within the year.

The NPR survey asked those agencies with diversity initiatives whether their diversity programs differed from their internal EEO/AA programs “in that [they

addressed] workplace diversity issues previously not addressed in the organization's EEO/AEP (affirmative employment programs)." The purpose of this question was to determine the extent to which agencies may have simply relabeled or renamed their EEO/AA programs in an effort to embrace the diversity movement. Interestingly, one-fourth (26 percent) indicated that those programs *did* primarily consist of their former EEO/AA efforts. Apparently those agencies were continuing efforts that had been in place for some time under the rubric of EEO/AA, but at the time of the survey those activities were simply referred to as "diversity initiatives." The remaining 70 percent¹ of the organizations with diversity programs, however, indicated that their diversity initiatives were broader in scope than their EEO/AA programs, in that they addressed workplace issues that had not received significant attention earlier. Previously unaddressed issues could include a focus on nontraditional demographic attributes such as organizational role or geographic origin, or the development of advocacy groups such as a diversity council.

The bulk of the survey asked federal agencies specific questions about the content, organization, and structure of their diversity programs (assuming they had one in place). Table 3 displays the proportion of organizations reporting that various characteristics were in place.

A number of interesting observations can be made regarding the presence of these various programmatic elements. For example, the program characteristics that are most frequently included in federal agency efforts are those that address "traditional" dimensions of diversity. More than 90 percent of agencies report that their programs specifically address race/color, ethnicity/national origin and/or gender. Eighty-six percent also address disability status and 73 percent address religion. Discrimination based on these characteristics is explicitly prohibited by statute, and so they have been the focus of EEO efforts for many years.

What is obviously most remarkable here is not that large majorities of agencies' diversity initiatives address these dimensions of diversity, but rather that some agencies apparently *do not* speak to these issues. It is surprising that even 5 percent failed to include racial differences, and nearly

10 percent failed to include ethnicity/national origins on their list of demographic attributes addressed by their diversity programs. One is left to wonder how effective diversity programs could possibly be implemented under such circumstances. More than one-quarter (28 percent) of the responding organizations report that they do not address religious differences, and almost 15 percent apparently fail to address disability status. Alternatively, a very large proportion (82 percent) address one or more nontraditional demographic characteristics; that is, attributes that are not the subject of protective legislation such as language, work style, or experience. Clearly, there are substantial and important differences among these organizations in the nature of their diversity initiatives.

As noted previously, a popular component of many diversity programs is the provision of training (Cox 1994, Thomas 1996, Fernandez 1999, Chambers and Riccucci 1997, Wilson 1997, Hudson and Hines-Hudson 1996, CAPS 1996, Mathews 1998, Gardenswartz and Rowe 1993). When the U.S. Merit Systems Protection Board surveyed federal agencies in 1991/1992 about their diversity programs, 20 of the 33 agencies that responded reported they provide diversity-related training. Many agencies said they *required* it of all of their employees or at least all of those enrolled in supervisory development programs (U.S. MSPB 1993). A substantial proportion (85 percent) of the responding organizations examined in the present study also indicated that they include "diversity training" for employees as a component of their diversity initiatives. But as before, what is more remarkable is that as many as 15 percent of the organizations which claim to have diversity programs in place apparently have chosen not to provide diversity training for their employees as part of their efforts.

Most of the other program characteristics reported in Table 3 are present in the initiatives of relatively fewer organizations. Many of those items are embraced by only about 40 to 50 percent of the federal organizations with diversity programs. For example, only 47 percent of those organizations report that their diversity initiative is incorporated into their organizational vision or mission statement, and only 49 percent have a diversity policy, directive, or administrative order. Thus, there is no clear uniformity in the presence of items thought

Table 3: Responses to Specific Items on the Diversity Survey (NPR Survey, 1999)

Item	Proportion of Agencies with Characteristic (percent)
Diversity initiative specifically addresses race	95.0
Diversity initiative specifically addresses ethnicity/national origin	90.8
Diversity initiative specifically addresses gender	89.2
Diversity initiative specifically addresses disability status	85.8
Diversity training is provided for employees	85.0
Diversity initiative specifically addresses one or more nontraditional demographic characteristics*	81.7
Diversity initiative specifically addresses age	80.0
Other employees, such as a diversity council or diversity trainers, perform significant duties related to the diversity initiative in addition to any single individual with day-to-day operational responsibility	79.2
Diversity training is designed to accomplish specific objectives	78.3
The agency evaluates the effectiveness of diversity training provided to employees	74.2
Training objectives are communicated to employees	73.3
Diversity initiative specifically addresses religion	72.5
Diversity initiative is linked to the organization's strategic plan or performance plan	72.5
Diversity initiative specifically addresses sexual orientation	68.3
Diversity is an element in performance plans of supervisors and managers	67.5
Diversity is an element in performance plans for members of the Senior Executive Service	66.7
Diversity awareness material is available	60.0
Diversity initiative implementation plan exists	56.7
Organization uses measures (such as productivity and performance) to assess the effectiveness of the diversity initiative	55.0
Accomplishment or status report exists	54.2
Head of the organization has key leadership responsibility for diversity	51.7
Diversity policy, directive, or administrative order exists	49.2
Internship program used	48.3
Diversity initiative is incorporated into the organization's vision or mission statement	46.7
The agency has conducted an organizational culture/diversity audit or survey in designing or implementing diversity plan	46.7
Program includes awards and incentives	45.8
Diversity council/group charter in place	44.2
Diversity newsletter or other similar communication in place	43.3
A specific identifiable amount is designated in the organization's budget for the diversity initiative	35.8
Formal mentoring program in place	34.2
Informal mentoring program in place	31.7
Organization requires employees to attend additional diversity training beyond an initial course	31.7
There is a specific person who has overall primary day-to-day operational responsibility for the diversity initiative	26.7
Diversity resource center or reading room is available	25.0
Diversity is an element in performance plans of nonsupervisory employees	11.7

* Nontraditional demographic characteristics included such attributes as communication style, economic status, family status, first language, geographic origin, military experience, organizational role, work experience, and work style.

to be important to diversity initiative success or development.

In fact, some of the items listed in Table 3 are found in only a distinct minority of the organizations studied. Fewer than 32 percent require employees to attend diversity training beyond an initial course, and less than 27 percent report that they employ a specific person who has day-to-day operational responsibility for the organization's diversity initiative. The program characteristic found in the smallest number of organizations (12 percent) is the inclusion of a diversity-related element in the performance plans of nonsupervisory employees.

In summary, by 1999 most federal agencies appear to have heeded the call to develop a program to better manage the increasingly diverse workforce. While many had adopted most of the components that the literature prescribes, there is wide variation in that respect. Some had done little more than rename their traditional EEO efforts while others expanded the demographic characteristics recognized by the program, linked diversity with the organization's strategic plan, and/or issued specific diversity policies or orders.

A Closer Look at Agency Programs

To explore in greater detail what agencies with diversity programs at various stages of development are doing, we examined activities in seven specific agencies. We chose three agencies whose responses to the NPR survey indicated that they

had well-developed diversity management programs. These were the National Institutes of Health (NIH), the National Institute of Standards and Technology (NIST), and the Bureau of Land Management (BLM). We also looked at two agencies that had more moderately developed diversity programs. They were the Substance Abuse and Mental Health Services Administration (SAMHSA) and the Mine Safety and Health Administration (MSHA). Finally, we examined two small agencies that reported not having a diversity program at all to see whether, even absent the title "diversity program," they might have similar activities in place. These were the Economic Development Administration (EDA) within the Department of Commerce and the National Agricultural Statistics Service (NASS). In each case we conducted in-person interviews with officials in charge of these efforts at their offices in the Washington D.C., metropolitan area, followed up with telephone interviews, if necessary, and reviewed relevant documents. Table 4 provides data on the representation of minorities in these agencies.

National Institutes of Health (NIH)

The National Institutes of Health is one of eight agencies of the Public Health Service that, in turn, is part of the U.S. Department of Health and Human Services (HHS). The organization, which is comprised of 27 separate institutes and centers, is one of the world's most prominent medical research operations. Its main location is a 300-acre site with 75 buildings in Bethesda, Maryland, but the NIH also has facilities around the nation and the world.

Table 4: Representation of Minorities in Seven Agencies: GS White Collar Employment (Percentages)

	African American	Asian/Pacific Islander	Hispanic	Native American	White	Total GS Workforce
BLM	2	4	2	6	86	7,764
EDA	3	27	0	4	65	244
MSHA	0	5	0	3	92	2,133
NASS	2	15	1	3	80	1,073
NIST	6	8	0	2	84	2,552
NIH	6	22	0	2	68	10,959
SAMHSA	2	27	1	4	66	505

The agency has approximately 14,000 career employees (white collar and blue collar) plus approximately 8,000 individuals holding special appointments for a total workforce of about 22,000.

According to information on the NIH website (www.nih.gov), the mission of the agency is to uncover new knowledge that will lead to better health. The NIH works toward that mission by conducting research; supporting research through grant funding to scientists in universities, medical schools, hospitals, and other research institutions; assisting in the training of research investigators; and promoting the communication of medical information. Stated most simply, the goal of the NIH is to generate knowledge to help “prevent, detect, diagnose, and treat disease and disability, from the rarest genetic disorder to the common cold.”

Background

The diversity program at the NIH (called the Workforce Diversity Initiative or WDI) was introduced at a forum in May 1995. Following that forum, a Diversity Congress was convened to facilitate the development of strategies and a structure for implementing the WDI throughout the agency. NIH’s efforts in this regard began before those of their parent department, the Department of Health and Human Services, leaving them free to set up a program without direction from the department level.

Several grounds were cited for the development of NIH’s interest in undertaking a diversity effort. Naomi Churchill-Earp, director of NIH’s Office of Equal Opportunity (OEO) at the time the initiative was undertaken, saw the establishment of the WDI as a means to streamline the various special emphasis programs at the agency.² She also recognized the difficulty of dealing with the wide array of separate employee advocacy groups—some of which were engaged in quite vocal protests at the time—that in many cases shared the same concerns. The development of a Diversity Council would serve as a means for better coordinating OEO’s work with them. The current acting OEO deputy director, Joan Brogan, suggested that the initiative came about because managing diversity was being promoted in the public and private sectors as a better business model for improving the work-

place environment. In fact, a number of other agencies were getting on board already. Another impetus for the development of the diversity effort was the U. S. Department of Justice’s guidance on affirmative action in employment, issued in 1996 following the Supreme Court’s *Adarand* decision. The HHS Office of General Counsel required the NIH to review their affirmative action plans. There was concern and interest in ensuring that these plans furthered compelling governmental interests and were narrowly tailored, as required by the Court. Some people suggested that even if affirmative action programs became constrained as a result of increasing legal challenges, a diversity effort, with its distinct goals and strategies, could continue. The NIH diversity guide for practitioners notes that “as legal restrictions on affirmative action programs continue to tighten ... long-term change strategies [such as the WDI] will become essential.”

Nature of the Program

The agency’s definition of managing diversity is taken from R. Roosevelt Thomas:

Managing diversity is the process of creating and maintaining an environment that enables all participants to contribute to their full potential in pursuit of organizational objectives.

To this, the NIH adds:

Managing diversity is a long-term change strategy enabling the NIH to examine its fundamental values and culture to determine whether all employees are reaching their full potential and making maximum contributions to the mission of the NIH. Effective management of diversity proactively promotes productivity and respect for the differences and similarities each person brings to the workplace.

The agency’s strategic plan for diversity management states: “It is the policy of the National Institutes of Health to manage the diversity of our employees by building an inclusive workforce, fostering an environment that respects the individual, and offering opportunities for all persons to develop to their full potential in support of science.”

An important feature of the WDI is its emphasis on the distinction between EEO/affirmative action and managing diversity. The differences are outlined in table form (see Table 1 in this report) on the WDI website and in its brochure.

As noted in the table, a key distinction is that diversity initiatives are voluntary; that is, laws or executive orders do not drive them. Brogan noted that the agency has made some progress in minority and female representation within its workforce (with the exception of Hispanics, Native Americans, and minority women). Because there is a fair amount of diversity already, the NIH needed to *manage* its diversity at the same time as it continued to enforce EEO program objectives. For example, there are disputes that may arise from cultural differences, occupational status perceptions, or between scientists and nonscientists. An EEO program would not recognize conflict arising from such differences to be unlawful discrimination. The agency's Center for Cooperative Resolution resolves such disputes at the NIH and in this respect is viewed as complementing the WDI. The Complaint Management and Adjudication Branch of the OEO handles illegal discrimination complaint allegations.

In addition, affirmative action is not endorsed as a strategy under the rubric of the NIH managing diversity initiative. Affirmative action certainly complements the overall objectives of a diversity initiative, but affirmative action planning has been in place within the EEO function since 1972. Workplace initiatives such as flexible work schedules or telecommuting are not included in the WDI portfolio either; those are part of the Quality of Work Life program that is housed in the human resource management function at NIH.

Structure and Resources

The WDI and traditional EEO functions are housed together in the Office of Equal Opportunity, and more specifically, within the branch that also has responsibility for EEO programs (including the affirmative recruitment activities). Within this branch, there are three diversity program managers, each of whom works with a set of institutes and centers on their diversity programs. OEO has a staff of 26 full-time employees.

In addition to the three diversity program managers, each institute and center has a person who has been assigned by its director to be a "diversity catalyst." This is not conceived of as a full-time position, although some institute and center directors appoint their EEO directors to the position of catalyst. Directors are asked to allow catalysts at least 20 percent of official duty time for diversity program responsibilities. During their tenure, catalysts are the champions of the diversity initiative within their institute or center, and serve as OEO's partner and point of contact. Catalysts are responsible for disseminating information to the organizations they represent and for initiating the progress evaluation of the initiative. Institutes and centers are also encouraged, but not required, to set up diversity committees or councils.

The other major component of the NIH WDI is the Diversity Council, whose role is to provide the NIH director and staff with advice on OEO policies and programs. Membership on the Council is designed to represent diverse communities within NIH such as scientific, administrative, and blue-collar staff, as well as employees of different ages, races, genders, sexual orientations, physical abilities, and ethnic backgrounds. Council members are appointed by the NIH director after either being nominated by their institute or center, or asked to serve in that capacity. The Council, which consists of 18 voting council members and three ex-officio members (the NIH deputy director, the director of OEO and a former Council member), now reports directly to the NIH director and deputy director.

Training and Awareness

Special observance events (e.g., commemorating Black History Month) take place, but are not the responsibility of the diversity program managers—volunteers from the various institutes organize them with guidance provided by OEO staff. These events are explicitly not to be considered substitutes for diversity training.

OEO has occasionally offered NIH-wide training featuring a recognized expert such as R. Roosevelt Thomas, Samuel Betances, or Trevor Wilson. For example, in April of 2001, OEO sponsored a diversity forum called "Diversity in the New Millennium." Beyond that, whether diversity training is mandated

or even offered is left up to the institute and center directors. OEO also has developed online diversity modules, which they will make available to interns and other short-term employees. The catalysts and Council members all receive diversity training.

OEO facilitates the provision of training by making available reading materials and audiovisuals, as well as a list of contractors that provide training. Diversity program managers also provide advice about the content of the training. The list of topics they recommend include managing change in the workplace, evaluating and assessing the workplace environment, cross-cultural communication, coaching and mentoring, dispute resolution, and changing organizational culture. Diversity training does not focus on employees' legal rights and responsibilities with respect to EEO—that is covered by EEO training.

Catalysts and other NIH employees are encouraged to promote diversity in more subtle and informal ways as well. For example, a list of "50 ways to respect diversity and positively impact the work environment" includes the following:

- Take a personal stand against harassment in all forms.
- Develop a technique to let persons know when they refer to women as "girls," or when a team of men and women is referred to as "you guys."
- Encourage conference and lecture planners to consider diversity when arranging for speakers and lecturers.
- Refuse to excuse or tacitly approve of inappropriate behavior because it is committed by a brilliant scientist.
- Develop a management style that allows for healthy disagreements.
- Practice effective listening or take a course on how to listen effectively to others.
- Study another language.

Accountability

There is an EEO and diversity critical element in all executives' performance plans, as mandated by the Public Health Service. EEO and diversity are also included in all managers' and supervisors'

performance plans, although it is sometimes included in an element addressing broader human resource concerns. The executive performance element requires managers to "routinely support the NIH EEO program, affirmative action program, Workplace Diversity Initiative, and EEO complaint resolution program." Evidence of support includes such activities as:

- Demonstrating a commitment to recruit, hire, and promote from representative pools of candidates
- Attending conferences and seminars to promote networking and outreach for underrepresented communities
- Developing and implementing strategies that promote the potential of all employees by [doing such things as] establishing multi-cultural work teams and providing career development opportunities for all employees
- Working to educate employees regarding their rights and responsibilities in open communication sessions
- Providing reasonable accommodation to individuals with disabilities

In addition, an objective within NIH's draft strategic plan calls specifically for establishing "a trans-NIH system of accountability for the implementation of the Workplace Diversity Initiative." This is to be accomplished by:

- Having the Diversity Program managers track results of WDI implementation efforts
- Monitoring and tracking WDI initiatives and statistics using appropriate measurement instruments and tools to assess managers' performance
- Holding at least quarterly meetings of agency leadership to review progress

Evaluation

When asked what has changed as a result of the diversity initiative, Brogan noted that there is a greater awareness of the value of differences among people. No formal accomplishment report has been written to date, although progress is mon-

itored informally through such mechanisms as focus groups of catalysts or annual status reports. There are plans now under way to develop a means for evaluating the effectiveness of the WDI based on Trevor Wilson's model, which combines data on the representation of various groups by occupational category with measures of employees' perceptions through focus groups, interviews, and/or a written survey (see *Diversity at Work* by Trevor Wilson, John Wiley and Sons, 1997).

National Institute for Standards and Technology (NIST)

The National Institute for Standards and Technology is an agency located within the U.S. Department of Commerce. With a total workforce of about 3,000, its mission, as specified on its web page, is to "develop and promote measurement standards and technology to enhance productivity, facilitate trade, and improve the quality of life" (www.nist.gov). In essence, NIST is a physical science research facility dedicated to developing technology needed by industry to "continually improve products and services." The agency employs scientists, engineers, technicians, business specialists, and administrative personnel. Approximately 1,600 guest researchers supplement the permanent staff.

Background

NIST's initial diversity strategy was established in 1993 by then-Director John Lyons, who was concerned about the lack of diversity in the agency's workforce. At that time, a study examining underrepresentation of women and minorities was undertaken and various recommendations were implemented. Support for the initiative was strong both at the departmental and agency levels. A Diversity Advisory Board (DAB) was established, which subsequently proposed that an Office of Diversity be created with a full-time staff person hired to direct the agency's diversity management activities. A search was conducted and Sol de Aude Eaton was selected. More recently, Naomi Churchill-Earp was recruited from the National Institutes of Health to temporarily advise management on program development.

In 1998, the NIST director expanded the DAB's mandate to make it responsible for "providing

advice to the director of NIST on diversity-related plans, policies, and programs, and serving as an advocate for diversity and mentoring issues at NIST." Since then, a final draft of a diversity strategic plan was completed, and the DAB chair is working to incorporate it into the management strategic plan for 2010.

One of the significant challenges NIST and other science agencies face is how to get many in the scientific and technical community to support and understand the need for diversity programs. Churchill-Earp commented that in many cases it is difficult to get line employees thinking about diversity or anything not directly mission-related work.

Nature of the Program

The five-year diversity strategic plan developed in October 2000 provides the following vision statement for NIST:

NIST is committed to maintaining its stature as a premier science agency by building an inclusive workforce, fostering an environment that respects the individual, promoting mentoring, and offering an opportunity for each person to develop their potential in support of the NIST mission.

Eaton and Churchill-Earp acknowledge differences between EEO and diversity. For example, they note a diversity program might seek to address issues of perceived differences between scientific and non-scientific staff. An EEO program probably would not be concerned with such issues because that basis for perceived different treatment is not a protected class under Title VII. Moreover, Churchill-Earp stated, "While EEO ensures everyone is treated the same, managing diversity speaks to treating everyone the same or differently to the extent it is necessary to accomplish the mission. EEO would say if one employee asks for a pencil, a pencil should be provided to everyone. Diversity says if one employee asks for a pencil, give that person a pencil to do the job and ask what others need. Their need could be for a pencil, pen, or crayon. EEO focuses on a class of people and diversity focuses on the individual." Another difference is the statutory mandate for an EEO program, while diversity is based on a business imperative.

Although the two programs can complement each other, there is a potential for built-in tension between their objectives.

Certainly, the diversity effort at NIST goes beyond race, gender, and ethnicity, as indicated by the following definition:

Diversity is the contributions and uniqueness employees bring to fulfilling the mission and global vision of NIST. On an individual level, diversity includes understanding, respecting and valuing physical, cultural and social differences.

Churchill-Earp has an expressed preference for R. Roosevelt Thomas's perspective that organizations should look at how business processes can be changed to better accommodate a diverse workforce. An example might be ensuring that qualification requirements are current and relevant. Another might be to provide formal and informal mentoring. This is where the distinction between EEO and diversity is limited. Those who work in diversity at NIST tend to see underrepresentation of minorities and women as an EEO issue, outside of their jurisdiction, and yet both functions are concerned with increasing the pool of applicants for jobs. Eaton participates in many job fairs during the year to recruit a diverse applicant pool, a traditional EEO function. Despite overlapping responsibilities, diversity and EEO work very cooperatively and strive for good communication between the offices.

Community outreach is another strong component of the diversity program. NIST's Diversity Program Office works in local schools to provide information about ongoing opportunities in the fields of engineering, science, mathematics, and technology. The agency holds a number of events each year to challenge student preparation for careers as scientists, engineers, and in advanced technologies. Scientists visit local schools to make the work of the agency more visible to the diverse population of students in the area and to demystify scientific research as a career option.

Another major component of the NIST diversity program is the Diversity Advisory Board, which plays a key role in lending credibility to the diversity effort.

The board reports to the director of NIST. It meets six times a year and holds an annual retreat to discuss its work plan and priorities. The board must endorse any major diversity-related initiatives or policy mandates. The board consists of one member from each organizational unit appointed by that unit's director. Each member is given authority to speak for his/her director on diversity-related matters. Because the focus is on a board that is representative of each operational unit (rather than, for example, occupational or interest groups), there are currently no clerical or blue-collar workers on the board. This lack of job-series diversity will be addressed as board members complete their terms and new members are added. The diversity program staff engages in other efforts to maintain contact with groups not represented on the board to ensure that their views are given consideration.

NIST also has developed a mentoring program for the administrative, clerical, and support personnel, and is in the process of developing a mentoring process for the professional staff. There is also a Self-Improvement and Mentoring Resource Center on the Gaithersburg, Maryland, campus that provides tools for employees to assess and improve their skills. NIST clearly considers the facilitation of mentoring to be an important part of its diversity program, as indicated by its inclusion as one of the "guiding principles" of the agency's diversity program: "Each person at NIST must be mentored to some degree and allowed to contribute to NIST excellence." Conflict management is not a formal component of the diversity program, but Eaton meets with people on an informal basis should diversity-related conflict arise. The Diversity Program Office also coordinates "quality of work-life" programs and activities, in conjunction with the Human Resources Management Division and others.

Structure and Resources

When the diversity program at NIST was started, it was decided that the effort should be kept separate from the agency's traditional equal employment opportunity and affirmative employment programs. Formally, the traditional EEO responsibilities are housed within the Office of Civil Rights, which reports to the director of NIST. The Diversity Advisory Board also reports to the director. The Diversity Program Office reports to the director of

administration and chief financial officer, and is one level removed from the director. Informally, there is much collaboration between the Diversity Program Office and the Office of Civil Rights. One example is the online training for the prevention of sexual harassment that they co-sponsor.

The Diversity Program Office employs three full-time staff members. The Diversity Advisory Board is comprised of 15 members who serve in that capacity on a collateral-duty basis. There is also one collateral-duty staff member in the agency's Boulder, Colorado, office.

The existence of at least two separate offices interested in recruitment (the Office of Civil Rights and the Diversity Program Office) and many separate entities (including employee advocacy groups) concerned with raising awareness and training can sometimes result in problems with duplication of effort, communication, and coordination among them. While the Office of Civil Rights is responsible for overseeing special emphasis programs, in practice Eaton has responded to the Department of Commerce Special Diversity Recruitment Initiative by doing most of the recruitment of, and outreach to, Hispanics and other groups. On the other hand, the Diversity Program Office considers the maintenance of two separate entities important for reinforcing that one office is statutory and the other is based on good business practices.

Training and Awareness

Another important aspect of the diversity program at NIST is the training that is provided to managers. Eaton developed a three-part training program with content that builds on each successive course. Specifically, the preferred training starts with a basic introduction to managing diversity. Next there is a session on cross-cultural communication. The third aspect of the training is a class on cultural competence. All new managers are encouraged—but not required—to participate in a one-day diversity training program. The exception is members of the Senior Executive Service, who are required to attend diversity training. The decision to mandate diversity training for all managers and supervisors was rethought after a vendor seemed to do more harm than good with some training techniques. This occurred prior to the establishment of the Diversity

Program Office. NIST has found the strategy of required training for executives and encouraged attendance for others to be effective. The heads of each unit are also encouraged to provide their own diversity training, and the Diversity Program Office provides videos and other training materials to assist the organizational units in doing so.

Contractors provide all diversity training for NIST and generally do not address rights and responsibilities under Title VII to any great extent, as the Civil Rights Office covers this subject in depth. The Diversity Program Office also owns several diversity-related videos, which operating units often check out and include as part of staff meetings.

In addition to the events sponsored by the Diversity Program Office, there are seven active employee groups at NIST—representing black, Latino, women, Asian, disabled, and gay and lesbian employees, and one representing guest researchers. These groups also sponsor awareness events.

Other aspects of the agency's diversity educational effort that were specifically mentioned by program staff members include a newsletter, web page, special emphasis programs, lecture series, and a student internship program. The Diversity Program Office also provides books and other literature to directors and members of the advisory board, and the office maintains a resource center.

Accountability

In December 1999, then-Secretary of Commerce William M. Daley issued a department-wide memorandum requiring that the performance plan for each manager and supervisor include a critical element promoting diversity, assigned a weight of at least 15 percent. The element requires managers to “consider equal opportunity and diversity principles in all aspects of program and personnel decisions.” It provides a list of suggested “major activities.” Activities are suggested rather than stipulated as they don't all apply to all supervisors. Among these are the following:

- Recruit, hire, and train staff based on principles of EEO. To the extent resources are available, provide on an equal opportunity basis training and learning/growth experiences for staff; e.g.,

details, rotational assignments, cross-training, and other developmental activities.

- Participate in and support staff involvement in outreach efforts of the organization; e.g., participation in minority and disabled recruitment, and cultural observance programs.
- Attend and actively promote training that supports diversity and EEO programs.
- Actively promote and encourage the use of mediation, facilitation, or other appropriate forms of alternative dispute resolution to address workplace conflicts.
- Promote and encourage the use of family-friendly workplace options.

Evaluation

Officially, the Five Year Strategic Plan for Managing Diversity, which covers October 2000 to September 2005, commits the agency to assessing organizational unit progress annually and the overall success of the initiative at the end of the five-year period. The agency is to develop measurable performance goals that provide a basis for comparing actual results with expected results. Staff has also developed a detailed implementation plan for achieving their goals that includes completion dates, resources needed, and measures of success. The implementation plan indicates that a Diversity Tracking System will be developed to share trend information with management on such employment actions as accessions, separations, promotions, personal development, and reassignments.

Churchill-Earp acknowledged that there are problems in finding good measures of the effectiveness of a diversity program. A stable or increased EEO complaint caseload, for example, could be evidence of heightened awareness and confidence in filing complaints rather than an increase in behavior that is perceived as discriminatory. She is considering working with the Employee Assistance Program to assess whether a change in the number and kinds of ailments reported to that program might be suggestive of an improved climate for diversity. She also believes that anecdotal evidence about the environment and retention rates for minorities and women are good measures of the impact of a diversity program on the organizational climate.

Two employee surveys (conducted in 1999 and 2000) revealed the presence of some negative attitudes toward diversity. NIST has seen some improvement and has plans to readminister the survey in late 2002 or early 2003 in order to assess whether the diversity program has helped to lessen some of those attitudes or raise awareness.

Bureau of Land Management (BLM)

The Bureau of Land Management is an agency located within the U.S. Department of the Interior. It administers 264 million acres of public land located primarily in 12 western states and Alaska. The areas of BLM responsibility include “extensive grasslands, forests, high mountains, arctic tundra, and deserts” (www.blm.gov). As noted on the BLM web page, the agency and its workforce of approximately 7,800 employees manage a wide variety of resources and uses including “energy and minerals, timber, forage, wild horse and burro populations, fish and wildlife habitat, wilderness areas, archaeological, paleontological, and historic sites” (www.blm.gov). The BLM is charged with sustaining the “health, diversity, and productivity of public lands for the use and enjoyment of present and future generations” (www.blm.gov).

Background

Historically, the BLM, like its parent department, has found it difficult to recruit sufficient minorities and women. As a result, by the early 1990s equal employment opportunity and diversity-related issues were a focus of concern. During the Clinton years, a number of top agency and departmental officials were dedicated to changing the agency’s profile and worked aggressively to do so. The diversity program, implemented in 1996, was an outgrowth of that effort.

Nature of the Program

The agency’s diversity effort is broader in orientation than traditional affirmative employment activities, according to Gloria Innis, director of the EEO Group. Traditional affirmative employment programs (AEP) are specified in law and tied to specific formulas, and so “under that orientation, once you achieve parity, the effort should end,” she explained. By contrast, the diversity program at the BLM focuses on additional issues not covered by Title VII of the

1964 Civil Rights Act, such as sexual orientation and geographic origin, and it includes flexibilities to accommodate single mothers or people who have large distances to commute to work. There is a Diversity Committee at the agency comprised of representatives of various offices and groups, providing a forum for the discussion of diversity-related issues and guidance for the program.

Despite recognition of the ways in which a diversity program may be distinct from traditional EEO/AEP, much of what is included within the diversity effort at the BLM bears considerable similarity to conventional EEO. In fact, Innis reported that the principal goals of the agency's diversity program were recruitment (primarily through visits to colleges and universities) and retention of under-represented groups. Indeed, the first goal listed in the agency's written Work Force Diversity Program Plan from 1997 is to "recruit a workforce that reflects the diversity of the nation's population." Specific items included in that plan are expansion of the agency's affirmative employment program, further development of targeted recruitment strategies to increase minority and female representation in specified job categories, an annual assessment of those strategies, and a review of position requirements to ensure that stated requirements are appropriate and applicable. The agency also conducts exit interviews to identify ways to improve minority and female retention. All of these "diversity" efforts are consistent with traditional EEO/AEP activities.

Structure and Resources

Organizationally, the diversity program at the BLM falls under the responsibility of the agency's EEO Group and is implemented through the efforts of two full-time staff members. The EEO Group also performs traditional EEO-related activities such as handling EEO complaints and developing affirmative recruitment plans.

Training and Awareness

In addition to the emphasis on recruitment, the diversity program at the BLM is also oriented toward changing the agency's culture to make it more supportive of individuals from diverse backgrounds. That goal is reflected in the agency's written diversity plan that stresses the importance of efforts to "educate managers and employees

regarding diversity" and calls for "mandatory diversity training for supervisors and managers." The training is to focus on "general diversity in organizations, preventing and resolving interpersonal conflict in the workplace, accessibility and reasonable accommodation issues (for the disabled), and preventing and dealing with sexual harassment." Similar training is part of the orientation process for all new employees. Innis stressed that the training effort is intended to prevent conflict and facilitate the resolution of problems before they escalate into major disputes. It is hoped that as a result, conflict among employees and between employees and their supervisors would be reduced as they learn strategies for dealing with interpersonal differences.

Accountability

To help ensure accountability, a diversity element is included within the performance plans of Senior Executives and all managers and supervisors, requiring them to support the diversity program and its implementation.

Evaluation

There has been no significant effort to measure the effectiveness of the diversity program at the BLM. Indeed, Innis noted that it would be extremely difficult to make such an assessment because it would require measuring changes in the organizational culture over time. An employee attitude survey—intended, in part, to assess the extent to which employees believe that the organizational culture was supportive of people from different backgrounds—was administered in 1999. There is discussion of administering that survey again sometime in the future, but Innis points out many factors affect employees' views of the organization's climate besides the diversity program.

Substance Abuse and Mental Health Services Administration (SAMHSA)

The Substance Abuse and Mental Health Services Administration is an agency within the U.S. Department of Health and Human Services. Established by Public Law 102-321 on October 1, 1992, the agency's mission is to "strengthen the nation's health care capacity to provide prevention, diagnosis, and treatment services for substance abuse and mental illness" (www.samhsa.gov). SAMHSA works with states, communities, and private organizations

to address the needs of people with substance abuse problems and to help assess community risk factors. The agency conducts its work primarily through the administration of a series of federal block grant programs intended to enhance substance abuse and mental health services. Targeted Capacity Expansion grants give local communities resources for the early identification and management of emerging substance abuse and mental health service needs. SAMHSA's more than 500 employees are organized into three units: the Center for Mental Health Services, the Center for Substance Abuse Prevention, and the Center for Substance Abuse Treatment (see www.samhsa.gov).

Background

According to Sharon Lynn Holmes, director of the Office of EEO and Civil Rights at SAMHSA, the diversity program was developed in 1995 by a former director of the Office of EEO, in conjunction with the agency's administrator.

Nature of the Program

Holmes stressed that the EEO and diversity programs are distinct, with the latter encompassing more dimensions than race and sex. The program's current focus is on a concept she referred to as "cultural competence," which involves the promotion of attitudes respectful of people from diverse cultural backgrounds. Holmes noted that the focus in EEO is on complaints resolution, and while the diversity program staff at SAMHSA try to reduce the number of discrimination complaints through their education and training efforts, their primary focus is on recruitment. As the agency's work involves dispensing services to the public in the form of grants, they want to ensure their staff includes people who understand the needs of diverse communities. Presumably, they see "cultural competence" as a way to make the agency a more attractive employer to minorities, so that the agency can be responsive to the diverse communities it serves. Since women already comprise 70 percent of the workforce, they are interested in increasing the representation of men of color, especially those under 30 years of age. Last year they concentrated on the recruitment of Hispanic men. They work closely with the agency's Human Resources Department in developing outreach efforts to minority communities. SAMHSA's diversity program also includes a

mentoring program focused on opening opportunities to employees in lower grade levels.

The programmatic orientation at SAMHSA appears to fit well within the traditional EEO paradigm, rather than extending to the broader diversity management framework, as it is focused largely on recruitment and upward mobility. When asked for documents regarding their diversity program, Holmes provided copies of the agency's *Affirmative Employment Program Plan for Minorities and Women* (for fiscal year 2001) and their *Affirmative Action Program for People With Disabilities* (for 2001). Both examine levels of representation of specified groups; review the previous year's accomplishments in increasing representation; and identify objectives for complaint processing, recruitment and hiring, employee development, and upward mobility for the coming year—all traditional EEO/AA concerns.

Structure and Resources

As would be expected, given the nature of the agency's program, the diversity effort is housed within the Office of EEO and Civil Rights. That office employs five full-time staff persons, 20 to 25 collateral-duty EEO counselors, and 20 EEO advisors.

Training and Awareness

Diversity training for agency managers is provided by the directors of the three centers (Substance Abuse Treatment, Substance Abuse Prevention, and Mental Health Services), but the training is not mandatory. The agency has developed online, self-training modules as well as literature explaining rules and responsibilities with respect to EEO. They also conduct team-building exercises that include a diversity component.

Accountability

There are no diversity elements included in the performance plans of managers and supervisors, with the exception of members of the Senior Executive Service and agency division directors.

Evaluation

There are no efforts to evaluate the effectiveness of the diversity program at SAMHSA.

Mine Safety and Health Administration (MSHA)

The Mine Safety and Health Administration, with a workforce of about 2,400, is an agency within the U.S. Department of Labor (DOL). Its mission is to “enforce compliance with mandatory safety and health standards” at all mining and mineral processing operations (www.msha.gov). MSHA inspectors examine each surface mine at least twice a year and each underground mine at least four times a year (although seasonal or intermittent operations are inspected less frequently) to identify imminent danger and compliance with standards. MSHA also investigates “mine accidents, complaints of retaliatory discrimination filed by miners [and] hazardous conditions complaints” (www.msha.gov). The agency’s other services include assisting mine operators in meeting legal requirements and improving their employee education and training programs.

Background

Michael Thompson, director of the Office of Diversity, Outreach, and Employee Safety, has emphasized the importance of the concepts of diversity and inclusion since he became director in 1982, although the use of the term “diversity” did not arise until many years later. In March of 1996, Assistant Secretary for Mine Safety and Health J. Davitt McAteer issued a policy statement on the subject of EEO and workforce diversity. The letter stated MSHA’s diversity policy as follows:

Implementation of MSHA’s workforce diversity and equal opportunity program involves all MSHA employees, as well as individual employees who are assigned specific program responsibilities. Indeed, the challenge for employees today and in the future is how to work more effectively with a workforce that is becoming more diverse and aware of culture, race, religion, language, ethnicity, and sexual orientation. Workforce diversity and understanding people’s differences are crucial to our continued success as a highly professional organization. I encourage and welcome the support of every employee in MSHA to strengthen our commitment to achieving equal opportunity and workforce diversity by working with managers, super-

visors, employees, and the MSHA Office of Equal Opportunity in a concentrated effort to support workforce diversity and equal opportunity.

The letter went on to state that the Secretary of Labor had instructed all of its agencies to establish a comprehensive EEO and workforce diversity program. Officially, the diversity program at MSHA began with the development of a diversity action plan in 1998. The impetus for development of the action plan, which covers 1998 to 2003, was the convening of a department-wide Diversity Task Force by then-Secretary of Labor Alexis Herman.

The MSHA has always faced a particularly difficult challenge in meeting EEO targets because of the nature of its labor force. Mine inspectors, for example, must have five years of experience in the mining industry, in which women and minorities are severely underrepresented. MSHA’s Diversity Action Plan (signed in 1998) states that minorities comprise only 15 percent, and women 6 percent, of nontraditional positions in the mining industry.

Nature of the Program

MSHA defines diversity as follows:

Diversity refers to differences in ethnic identification, cultural background, gender, age, sexual orientation, physical ability, family status, experience level, and religious and political beliefs. It is about differences across individuals or groups of individuals.

Despite the diversity policy and action plan, the main focus of MSHA’s effort appears to be on traditional EEO activities. For example, because of the poor representation of women and minorities for the reasons stated above, they have recently created a new position—outreach manager—to focus on increasing the diversity of the candidate pool. Action items in MSHA’s Diversity Action Plan for 1998-2003 include:

- Identifying the current characteristics of the mining workforce and seeking to use that information to establish diversity benchmarks.
- “Applying diversity initiatives” to increase minority representation.

- Continuing to update and endorse the diversity and EEO policies and procedures.
- Developing a videotape communicating top leadership's commitment to diversity.
- Developing a schedule of special emphasis programs.
- Providing mandatory diversity and EEO training as well as training for managers on the merit staffing and rating processes.
- Revising performance standards for all MSHA managers and supervisors to hold them accountable for diversity.
- Expanding career opportunities for employees via such mechanisms as the Career Enhancement program, bridges, and upward mobility.
- Developing a mentoring program.
- Recruiting job candidates more aggressively and broadly.

Conflict management, while originally included as part of the diversity training, is officially under the purview of the employee and labor relations function in the Human Resource office. It was de-emphasized as a diversity issue in order to make it clear to managers that any advice they need about problems with employees should be directed to the agency's employee relations specialists. Similarly, initiatives such as telecommuting and flexible scheduling are the responsibility of Human Resources. There are plans to create a diversity council in the coming year.

Structure and Resources

The diversity program, housed within the Office of Diversity, Outreach, and Employee Safety, has a staff of five full-time employees. These employees are EEO specialists with diversity-related work included in their job description—there are no employees assigned solely to diversity efforts. The director reports directly to the director of administration; the office is independent of the human resources function.

Training and Awareness

As noted above, the MSHA provides mandatory diversity training to all managers, supervisors, and

employees, which often includes a film by Morris Massey that addresses improving communication among diverse groups. The training emphasizes how diversity is broader than traditional EEO and affirmative employment programs and that the rights of all groups (defined broadly) must be protected.

Thompson noted that when he speaks to employees about the importance of diversity, he emphasizes that "you can have diversity even if the workforce is all white men because of differences in religion, age, and other factors." He believes the goal for a diversity program should be the inclusion of everyone. Special emphasis program functions are also an important component of MSHA's diversity effort.

Accountability

Managers' and supervisors' performance management plans include a critical element that requires them to demonstrate effective management of people by:

- Fostering an inclusive working environment which encourages all employees to be participants in achieving organizational goals.
- Supporting recruitment/outreach to achieve a diverse workforce.
- Demonstrating fairness in selecting, assigning work to, and developing staff, basing decisions on merit and encouraging employee self-development.
- Taking steps to address issues of discrimination on the basis of race, color, religion, sex, age, national origin, disability, or sexual orientation that are observed or brought to his/her attention.
- Periodically reviewing DOL EEO policy and workplace values with staff.
- Providing frequent and constructive fact-based performance information to staff and good performance solutions to performance issues.
- Helping staff to set ambitious goals that stretch the capacity of the individual and organization and encouraging the staff to go further towards achieving more than what traditionally would be expected.

The action plan also calls for the development of a “workplace values” performance appraisal element for nonsupervisory employees, following consultation between the department’s Human Resource Center and the unions. That objective has not been accomplished yet.

Evaluation

When asked how the diversity program had improved the environment at MSHA, an EEO staff member replied, “People are getting more training in their rights and responsibilities.” The agency conducts no formal evaluation of the impact of its diversity initiatives, but they do ask training participants to complete an evaluation form immediately following the session. The form consists of three open-ended questions inquiring as to the usefulness of the session, its anticipated impact on the trainees’ work in a diversified environment, and suggestions for improving the course.

The agency does submit yearly status reports to the Department of Labor on the completion of items included in the 1998 Diversity Action Plan. The 1999 report submitted at the end of the first year showed that most items were “on target” or had been given revised completion dates.

Economic Development Administration (EDA)

The Economic Development Administration is located within the U.S. Department of Commerce. Its purpose is to help “generate jobs, help retain existing jobs, and stimulate industrial and commercial growth in economically distressed areas of the United States” (www.doc.gov/eda). The EDA has a workforce of approximately 270 employees who work in partnership with state and local governments, regional economic development districts, and nonprofit organizations to address problems associated with “long-term economic distress, as well as sudden and severe economic dislocations including recovering from the economic impacts of natural disasters, the closure of military installations and other federal facilities, changing trade patterns, and the depletion of natural resources” (www.doc.gov/eda). The EDA provides grants for infrastructure and business development so that distressed areas can develop their own locally based comprehensive economic development strategies.

Background

In completing the 1999 National Performance Review survey, the EDA reported that it had no diversity program in place, and that remains largely true two years later. Gerald R. Lucas, EDA’s deputy chief financial and chief administrative officer, is also responsible for EEO and diversity issues. According to Lucas, the Clinton administration’s first Secretary of Commerce, the late Ron Brown, pushed strenuously for greater effort to be made throughout the department in the areas of EEO and diversity. Lucas found Secretary Brown’s charismatic approach very effective. The Secretary established a department-wide Diversity Council and required all operating units (such as the EDA) to establish councils as well. Succeeding secretaries have kept the initiative in place. In 1998, Secretary William Daley issued a memorandum to all Commerce Department employees stressing the department’s commitment to the concepts of diversity and equal opportunity, and urging the creation of “an organizational culture that embodies mutual acceptance, inclusion and empowerment, and firmly rejects all forms of discrimination and harassment.”

Nature of the Program

Although the EDA does not have an official diversity program, it promotes diversity through intern and mentoring programs, family-friendly workplace practices, and efforts to resolve workplace disputes at the lowest possible organizational level. The agency’s Diversity Council is comprised of representatives from each division, and meets periodically to advise EDA top management on diversity-related matters. Currently, it is in the process of developing a diversity action plan, which presumably will form the basis for a more formal diversity program. The action plan is expected to recognize that diversity management includes issues associated with sensitivity, participation, respect for cultural differences, and an acknowledgment that people differ from one another in more ways than by race, ethnicity, and gender.

Structure and Resources

The EDA’s EEO program and activities designed to promote diversity are housed in the Office of Finance and Administration, under Lucas’s direction. Prior to assuming this position, he served as

the director of the Office of Civil Rights for the Commerce Department from 1982 to 1994. Lucas's diversity-related responsibilities in EDA are primarily to ensure that the agency meets the department's objectives regarding minority and female employment, which are determined by the department's Office of Civil Rights. Consistent with those objectives, the EDA focuses on establishing specific hiring goals for minorities and women and conducting recruitment and outreach efforts to attract them as potential employees.

Training and Awareness

Relatively little has been done at the EDA in terms of diversity training, although all Senior Executives received such training in early 2001. In the fall of 2001, all managers and supervisors will also receive diversity training as part of a broader training effort. The focus for the training is on understanding and valuing differences among people and managing conflict within the workplace.

Accountability

As noted earlier in the discussion of NIST, former Secretary Daley sent a memorandum to all secretarial officers and heads of operating units and departmental offices in 1999 mandating that a critical element reflecting the promotion of diversity be included in the performance plans of all Senior Executives, managers, and supervisors (see this report's section on NIST for a list of associated activities). Lucas indicates that inclusion of the diversity element in the performance appraisal process forces managers to be conscious of diversity and accountable for it, thus helping the agency move forward. Nonsupervisory employees at EDA are also rated with respect to diversity, but the objective is much more broadly defined in those cases.

Evaluation

When asked about the impact of the EDA's diversity efforts, Lucas responded that its accomplishments have included a greater awareness among employees of the importance of diversity and an increased commitment by management to the concept. He also suggested that employee attitudes have changed and employee expectations have grown. "Some managers have gone through a metamorphosis from a traditional view to a much more tolerant

view," Lucas reported. No formal evaluation of the EDA's efforts has taken place, however, other than through monitoring compliance with the diversity element in the performance appraisal process.

National Agricultural Statistics Service (NASS)

Located within the U. S. Department of Agriculture, the National Agricultural Statistics Service is charged with providing timely, accurate, and useful statistics in service to the American agricultural community. They discharge their responsibility by conducting the agricultural census, administering numerous surveys, and preparing hundreds of reports each year covering virtually every facet of agriculture in the United States. The agency's approximately 1,100 employees address subjects ranging from agricultural production and the supply of food to prices paid to farmers, the level of farm wages, and the labor market within agriculture. NASS reports examine issues associated with traditional crops, such as corn and wheat, but also address specialties such as mushrooms and flowers (www.usda.gov/nass).

Background

NASS has no formal diversity management program. The agency employs one full-time EEO and civil rights officer (Rafael Sanchez), with other employees assigned on a collateral-duty basis to ensure attention is paid to specific groups (e.g., women, Asian/Pacific Islanders). Sanchez and Linda M. Raudenbush, a human resources and organizational development specialist with the agency, report that NASS makes no distinction between EEO and diversity. The agency's efforts focus primarily on traditional EEO concerns including minority and female recruitment, the processing of discrimination complaints, and employee career development.

Training and Awareness

NASS has provided training on the concept of diversity since 1995 to all staff and managers, and since 1997 that training has been mandatory. In that year, an internal study described a history of civil rights problems within the Department of Agriculture, which helped to spur the requirement for diversity training. The instruction addresses the importance of valuing differences among people

and supervisory skills needed to better manage diverse employees. Since 1997 the agency has also included diversity training in its orientation process for new employees.

Summing Up: Similarities and Differences Among Agencies

Table 5 compares all seven of the agencies studied on a number of programmatic dimensions. It is clear from these case studies that regardless of the

size or scope of the agency or its diversity programs, there are some common elements. These include the premise that a diversity program is meant to be broader than a traditional EEO/AA program in that it focuses on differences that are not addressed by those programs, such as work style or occupational differences. This is reflected in the definitions of diversity that some of these agencies have developed. As MSHA puts it, diversity is “about differences across individuals or groups of individuals.”

Table 5: Summary of Agency Program Characteristics

Diversity Program Component	BLM	EDA	MSHA	NASS	NIH	NIST	SAMHSA
Date of initiation of formal diversity program	1996	*	1998	*	1995	1997/98	1995
Housed within EEO office	Yes	*	Yes	*	Yes	No	Yes
Number of full-time staff	2	0	5	1	26	3	5
Diversity defined as more than sex, race, and other traditional EEO categories	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Have diversity action or strategic plan	Yes	No**	Yes	No**	Yes	Yes	No
Major focus on recruitment	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Includes awareness events (e.g., special emphasis functions)	Yes	Yes	Yes	Yes	No	Yes	Yes
Includes flexible scheduling, telecommuting, etc.	Yes	Yes	No	Yes	No	Yes	Yes
Includes a diversity council	Yes	Yes	No	No***	Yes	Yes	No
Includes focus on conflict management	Yes	Yes	No	No	Yes	No	No
Diversity training required for managers and supervisors	Yes	Yes	Yes	Yes	No	Yes****	No
Diversity training included in employee orientation	Yes	Yes	Yes	Yes	No	Yes	No
Measure effectiveness	No	No	No	No	Yes	Yes	No
Have administered attitude survey as part of assessment	Yes	No	No	Yes	No	Yes	No
Diversity element in supervisors/managers performance plans	Yes	Yes	Yes	Yes	Yes	Yes	Yes

* These agencies don't have a formal diversity program.

** There is an agency affirmative action plan that includes discussion of diversity-related issues.

*** NASS has a Civil Rights Advisory Committee that provides guidance on issues related to civil rights, EEO, and affirmative employment plans.

**** Diversity training is required for executives, recommended for others.

While all but two (NASS and EDA) claim to have a diversity program in place, only the efforts of NIH and NIST really appear to extend into arenas beyond the traditional EEO/AA activities that focused on recruitment and complaint processing. These two have chosen to incorporate distinct elements into their approaches. NIST's diversity program emphasizes community outreach and the development of mentoring programs, while NIH has created a new position called a "diversity catalyst" and encourages employees to "show respect for diversity and positively impact the work environment" in many everyday ways such as by practicing effective listening or studying another language. NIST, like BLM, includes flexible working arrangements within the rubric of its workforce diversity program, while NIH and MSHA have assigned management of those programs to their human resource offices.

While most of the seven agencies have programs that are more aligned with traditional EEO/AA than the newer managing diversity model, an exception is in the area of training. All of the seven offer training (and half require it) that is broader than the traditional EEO training focusing on legal rights and responsibilities. This training generally stresses the importance of valuing differences among people and sometimes more general topics such as effective communication and negotiation.

Even while emphasizing the differences between EEO/AA and diversity, most of these agencies house their diversity efforts within their EEO offices and have no staff solely dedicated to diversity. Even though NIH has devoted considerable attention to emphasizing the distinction between EEO and diversity, the diversity program resides in the Office of Equal Opportunity, and diversity program managers also perform EEO functions. The exception is NIST, in which the decision was made to separate the two completely. Yet even NIST's diversity program staff is involved in some traditional EEO functions such as targeted recruitment of underrepresented groups. EDA has no staff assigned full-time to EEO or diversity, and NASS has only a single EEO officer responsible for all efforts in that regard. Size of staff is not necessarily a function of agency size; SAMHSA has half the workforce that NASS does, but five full-time staff members.

There has been little effort to systematically assess the effectiveness of these diversity programs. Only NIH has begun a process, prescribed by Trevor Wilson (1997), to do so. The final sections of this report provides our recommendations for how such an evaluation could be carried out.

The Importance of Measuring Effectiveness

It is useful to know what activities comprise federal agency diversity programs, but even more essential to assess whether these programs are accomplishing their intended purpose of creating a more equitable work environment than may have existed in the past. This is particularly timely in light of the federal government's recent emphasis on measuring performance in order to ensure the public is attaining the most return for the tax dollars and other resources they invest in government.

This is the purpose served by impact analysis, which involves the application of social science methodology to questions of whether and to what extent the objectives or goals of public programs have been met. It requires the identification of appropriate measures of goal achievement, the utilization of appropriate research designs, data collection, and analysis to determine whether the program has had the desired impact. Only under such circumstances can reasonably valid conclusions necessary for fair evaluation be reached.

Given the disputes that sometimes emerge regarding organizational diversity programs, it would seem all the more imperative that there be a systematic impact evaluation of those efforts within federal agencies. In its most recent report on the demographics of the American labor force, even the Hudson Institute denounced the "diversity craze" that was launched by its 1987 analysis and the response from "diversity entrepreneurs" who "misread" *Workforce 2000* (Judy and D'Amico 1997, xiv-xv). Frederick Lynch has criticized the "diversity machine" as one that "indiscriminately

blends social science and ideology, [and] serious substance with silly platitudes" (1997a, 17-18; see also Lynch 1997b). Some argue that diversity training, in particular, has been not just ineffective, it has been harmful, creating such a backlash that new firms have been created to "mop up" the messes made by other diversity trainers (Lubove 1997, Flynn 1999, Hemphill and Haines 1997). Others have expressed the concern that broadly focused diversity programs have diluted the still-needed focus on ensuring the continuance of traditional equal employment opportunity and affirmative action for women and people of color (Morrison 1992, Caudron and Hayes 1997). Another view agrees with the importance of organizational restructuring to create a more inclusive environment, but argues that the managing diversity approaches that emphasize identity consciousness will not achieve the desired results (Krefting and Kirby 1997).

Federal diversity programs are not immune from this criticism. A 1994 article in the *Washington Times* lampooned the Department of Housing and Urban Development for including "cultural diversity" in the performance standards for managers and supervisors (Price 1994). Near the end of her period in office, Environmental Protection Agency Administrator Carol Browner found herself defending her agency's diversity initiatives before the House Science Subcommittee (Lunney 2000).

It is perhaps, then, quite reasonable for Ivancevich and Gilbert to argue: "Demography-is-destiny speeches and statements by advocates must be

replaced with bottom-line data and proof that diversity management adds value to the organization and its employees.” Wise and Tschirhart (2000, 389) agree: “The lack of empirical research on the organizational-level outcomes is troubling, given the emphasis in the literature on the organizational-level benefits of the managing for diversity approach.” Even while arguing against an identity-conscious approach to managing diversity, Krefting and Kirby (1997) contend that the demographic effects of human resource practices should be tracked to ensure those practices are not having an adverse impact on some groups of employees in a way that would suggest they are not identity-blind.

Indicators of Success

The first step in an analysis of impact is to identify appropriate measures to serve as indicators of whether a program is accomplishing its intended objectives. As is the case with many other public endeavors, reasonable goals for agency diversity management programs might be specified in a number of ways. Based on the literature summarized early in this report, however, one would expect that diversity management programs would be intended to ensure that the climate within public organizations is such that people of diverse backgrounds would find those organizations comfortable and attractive places to work and would be able to progress within them as far as their abilities were able to take them. It also would be expected that diversity programs would help to educate managers and supervisors about biases (often unconscious) that might hamper their willingness to provide all employees with equal opportunities for fulfilling work and advancement.

Of course, diversity may be defined in terms of a broad number of factors, but in the context of American public agencies, race, ethnicity, and gender are among the most salient demographic variables. Inequities that manifest themselves along racial, ethnic, and gender lines are still common. It is, undoubtedly, for this reason that when agencies are asked to describe their measures of effectiveness for their programs, many refer to measures that traditionally are used in EEO/AA programs such as a comparison of agency workforce demographics with the civilian labor force. However, given the slow nature of employment progress for women

and minorities, it can take a long time to change significantly the composition of an organization in those terms. As a result, such a comparison may not be the best gauge for assessing the effectiveness of a diversity program in the short term.

It has been suggested that employee perceptions as to whether they find their work environment to be equitable similarly would provide a good measure of diversity program effectiveness (see, for example, Wilson 1997). The difficulty with this measure is that stable or increased dissatisfaction with the work environment may also reflect expectations that have been heightened as a result of the diversity initiative. Moreover, many other factors can affect employee perceptions of their work environment, including a potential or imminent reduction in force, or adverse publicity in the press resulting from employee advocacy groups’ efforts to draw attention to perceived inequities.

Because diversity programs are intended to have a broader impact on the work environment than traditional EEO programs, it would seem that more dynamic measures are required to assess their success. We recommend that agencies examine various types of personnel actions and their effects on women and minorities. In particular, for the reasons described below, it seems appropriate to focus on promotions, dismissals, and voluntary turnover.

Promotions

The distribution of promotions among various groups is an important indicator of equity. In its studies of the federal workforce, the Merit Systems Protection Board (MSPB) found that women and minorities are promoted proportionately less than men and nonminorities from entry- or lower-level jobs (e.g., grades GS-7 or GS-9) in professional and administrative occupations. The MSPB suggested that among the reasons for these restricted opportunities were negative stereotypes, which are often unconscious and seldom intended. For example, women are often presumed to be more interested in their families than in their careers, and Asian/Pacific Islanders are typecast as more capable of performing technical than managerial work (MSPB 1992, 1996; see also Naff 2001). One expectation of a diversity program is that it would provide training that would make managers aware of the

tendency to stereotype so they could make a conscious effort to avoid it.

The MSPB also noted that women were sometimes hampered by formal and informal criteria for advancement, such as the number of geographic relocations or hours worked each week. For most jobs, these are not valid indicators of job performance or promotion potential and tend to have an adverse impact on women. Much of the diversity literature recommends a reexamination of the organization's promotion and performance appraisal criteria to identify potential bias and, where necessary, to revamp them (see Table 1). One would expect, then, that a successful diversity program would create greater promotion opportunities for minorities and women.

Because the MSPB determined that minorities and women faced lower rates of promotion in lower-graded jobs, it would seem important to focus on promotions at these levels. However, many professional and administrative positions have career ladders where an incumbent can expect to be promoted to a journey-level grade of GS-12 without competition. It would seem wise, then, also to examine promotions from GS-12 to GS-13, where incumbents are more likely to face competitive promotion decisions.

Most analyses using aggregate data to determine whether men and women or minorities and non-minorities have equal promotion opportunities rely on a comparison of simple promotion rates (see, for example, MSPB 1992, 1996). Such a rate could be calculated by dividing the number of women or minorities promoted by the number of women or minorities present at a given grade level. Under this approach, if one quarter of the women and one quarter of the white men are promoted from GS-9 positions in a particular organization, the assumption is that an equitable distribution of promotions has occurred in that women are promoted at the same "rate" as white men.

However, this measure overlooks a critical factor. Where a group is few in number in an organization, fewer promotions of members of that group might be required to achieve equitable or even superior promotion rates compared to other groups. For example, assume that in a particular organiza-

tion there are 100 white men and 10 minorities. Promoting 10 white men yields a promotion rate of 10 percent. To achieve an equivalent promotion rate for minorities, the organization need promote only one minority. Promoting two minorities, for a promotion rate of 20 percent, suggests that minorities enjoy a much greater opportunity to be promoted than white men, but in fact far fewer minorities than white men are actually promoted.

To minimize this difficulty, we recommend a measure that is based on the assumption that minorities and women should be promoted at least in approximately the same proportions as their numbers in the relevant workforce. For example, if minorities represent 10 percent of the workforce, they should be expected to receive no fewer than 10 percent of the promotions, if, in fact, there is an equitable environment within the organization. Essentially then, our measure consists of the minority (or female) share of total promotions in the year 1999 (from GS-9 and GS-12 positions) relative to the minority (or female) share of the relevant workforces in that same year calculated as follows for minority group members:

$$\frac{\text{Number of Minority Promotions}}{\text{Total Number of Promotions}}$$

$$\frac{\text{Number of Minorities}}{\text{Total Number of Positions}}$$

A quotient of 1.0 or greater means that minorities and women are being promoted in proportion to their representation in the workforce or better.

Dismissals

A second possible indicator of success of agency diversity programs is a measure of the extent to which African Americans are discharged from their jobs at rates disproportionate to their presence in the workforce. We focus in this case on African Americans because of the long history of disparity in adverse actions for that group (U.S. Office of Personnel Management 1995, Zwerling and Silver 1992, Halloran 1988, Harmon, Vaughn, and Cromwell 1987, National EEO Task Force Report 1991, 1993). In the mid 1990s, the Office of Personnel Management conducted an extensive

study of the disparity in federal firing rates and ruled out differences in education, experience, performance appraisal ratings, or other such factors as the sole cause of the disparity. Instead, they suggested that “actual bias or lack of cultural awareness” was an explanation (OPM 1995, ii).

Such attitudes are precisely the kind of discord that managing diversity programs are meant to address (Soni 2000). Diversity training programs are often designed to root out bias and increase cultural awareness. The literature also suggests that organizations provide training in the skills required to work in a diverse workforce. Among the important skills are effective communication and conflict resolution. Greater proficiency in these areas could certainly reduce the likelihood that poor communication and conflict between supervisors and employees would ultimately lead to a dismissal action. The diversity literature also stresses the importance of holding managers accountable for success in achieving diversity-related goals. One such diversity goal could be, as is the case at MSHA, the requirement that they provide frequent fact-based performance information and solutions to staff, a practice that should also reduce performance problems that ultimately result in a dismissal.

Therefore, it seems appropriate to look at whether an agency’s diversity program has achieved a more equitable distribution of dismissals between African Americans and other employees. This would be calculated in the same fashion as our promotion ratio discussed above. In this case, a positive outcome would be a quotient of less than or equal to 1.0, indicating that African Americans are dismissed in numbers less than or equal to their proportion of the workforce.

Voluntary Turnover

A third measure of the success of an agency’s diversity efforts is based on the frequency of voluntary separations by women or minorities. It is well established that unwanted turnover can have severe consequences for organizations (Abbasi and Hollman 2000). Indeed, in the late 1980s the National Commission on the Public Service (1989; known more commonly as the Volcker Commission), the National Academy of Public Administration (Levine 1986), and others referred to a “quiet crisis” in

the federal government (see also GAO 1990) that would result when the federal government would be unable to retain its fair share of the “best and brightest.” Voluntary turnover can result from dissatisfaction with the job (Cotton and Tuttle 1986) and perceptions of unfairness in decisions regarding work-related outcomes (e.g., promotions) (Rutte and Messick 1995).

Some of the diversity literature encourages organizations to facilitate the development of groups representing specific categories of employees such as Latinos, women, or African Americans. These groups may help to reduce the isolation of members of these groups, which presumably would increase their willingness to remain on the job. It is also suggested that organizations work proactively to change an organizational culture that reflects the orientation of nonminority men to create a more inclusive environment. Diversity training is also expected to positively affect the culture by making people more aware of, and receptive to, cultural differences. It is expected that these activities would result in minorities feeling greater acceptance so they would be less likely to voluntarily leave their jobs. Therefore, we would expect that the female and minority share of voluntary quits in such circumstances would be equal to or less than their share of the workforce. The measure is constructed in a fashion similar to that used for our promotion and discharge ratios, but with the desired outcome being a quotient of less than or equal to 1.0. Once these measures are constructed, one need only examine whether the ratios improved following the implementation of the diversity program.

For example, Figure 2 shows promotion rates for women and minorities by year at NIH. (Recall that NIH has a very well developed diversity program). As can be seen, women, in general, have been promoted at a rate that is in proportion to their representation in the NIH workforce, or slightly better. These promotions exhibit a relatively stable pattern across the entire period of time analyzed, before and after the implementation of the diversity program. With respect to minority promotion ratios, a generally upward trend prior to the beginning of the program was reversed in the years following the program—although the ratio remained at 1.0 or

Figure 2: Minority and Female Promotion Ratios at the NIH (promotions in GS grades 9 and 12)

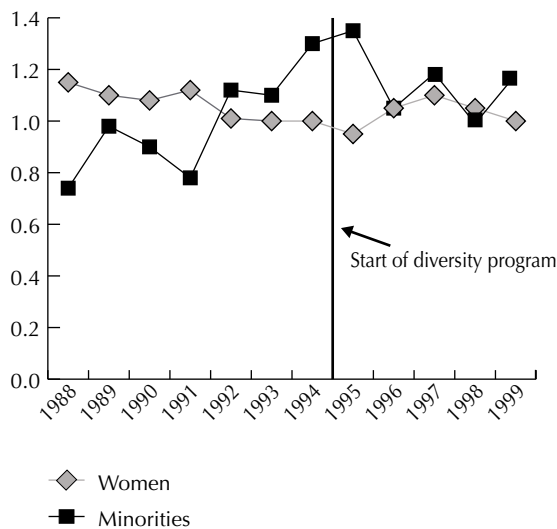
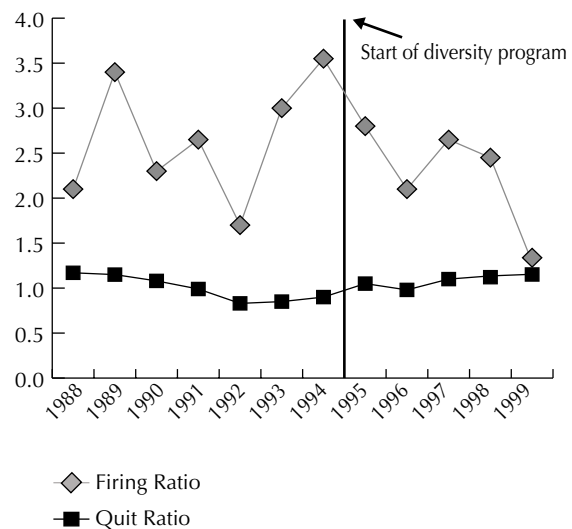


Figure 3: African-American Firing and Quit Ratios at the NIH



better. It may be that the diversity program actually had the effect of distributing promotions more equitably across the entire workforce, admittedly not necessarily a positive outcome from the minority perspective.

Figure 3 shows dismissal and quit ratios computed for African Americans over the same period of time. In all the years examined, the firing ratio has been above 1.0, meaning that, as is the case government-wide, African Americans at NIH have been fired at rates disproportionate to their representation in the NIH workforce. The ratio has fluctuated rather wildly during the period analyzed, although there was a downward trend following the implementation of the program and a noticeable decline in the last year analyzed. If that trend continues, it may suggest that the diversity program

is having a positive effect with respect to this measure. African-American quit behavior appears to be very stable across the entire series of years examined, hovering at about 1.0. This means that African Americans are leaving their jobs at NIH in about the same proportion as their representation in the workforce.

This kind of visual analysis, then, is useful for assessing whether a diversity program is successfully creating a more equitable work environment for women and minorities. It can be supplemented with interrupted time-series regression analysis, which provides quantitative estimates of the impact of the program at the time it was implemented and during the years following. An explanation of this method is provided in the Appendix to this report.

Concluding Observations and Recommendations

Observations

Since the early 1990s, employers across the country have developed programs to create better work environments for their increasingly diverse workforces. While much has been written about these efforts in the private sector, few have commented on the work of federal agencies. Yet, diversity efforts in the federal sector are arguably even more important than private sector ones, because of the government's vital and visible role as the nation's largest employer and enforcer of equal employment opportunity laws.

We found that by 1999, the majority of federal agencies reported having a diversity program in place. Survey results show, however, that the activities they employ vary widely, spanning the range from continuing to do little more than what was expected of traditional EEO/AA programs to extending significantly beyond those parameters. This finding was confirmed by our in-depth case study analysis of seven federal agencies, whose programs matched this pattern. For example, NIST has chosen to completely separate its diversity program from EEO and to emphasize mentoring as an important component, while NIH has chosen to keep its program within the EEO office, but to establish diversity "catalysts" within each of its institutes and centers. BLM and MSHA focus, understandably, on recruitment since their white-collar workforces are the least diverse of the seven, while SAMHSA maintains that its program has shifted its focus from diversity to "cultural competence."

There has been very little effort to systematically evaluate the impact of federal agency programs despite the fact that public sector agencies are increasingly being called upon to show they are meeting their objectives by measuring performance and documenting improvements. Diversity programs should not be excepted from this expectation, particularly because they oftentimes have been subject to sharp criticism in Congress, the media, and elsewhere.

We suggested some measures that would serve as viable indicators of the success of diversity programs. These include ratios that assess whether women or minorities (or potentially any other category of employees) are promoted, dismissed from, or voluntarily leave their jobs in proportions commensurate with their representation in the workforce. These measures would show, for example, whether the mentoring or career advancement programs that are characteristic of many diversity programs are helping to ensure equitable promotion opportunities for all groups within the workplace. They would also show whether training in communication and conflict negotiation has helped to ameliorate the dynamics that have resulted in the disparate dismissal rate of some minority groups. An examination of turnover patterns would suggest whether the diversity program has created a more inclusive organizational climate, in which minorities and women believe they are respected and have commensurate access to consequential work assignments and advancement opportunities.

The collection and analysis of these data also highlight the problem areas that the diversity program should seek to address. In a particular agency, promotions of women vis-à-vis their representation at particular grade levels may indeed be a problem, in which case that agency might want to direct its attention to identifying potential barriers to their advancement, and/or developing a mentoring program for women. Another agency might find that the quit ratio for Latinos, for example, is greater than one would expect, and so that agency might develop initiatives specifically focused on Latino retention. The advantage of a diversity program is that it is not defined by laws and regulations that require specific activities, such as an EEO program might be, and therefore it can be tailored to an agency's unique circumstances.

In the example included in the previous section, promotion opportunities for women and voluntary quits by African Americans at NIH appear to be unaffected by the implementation of the diversity program. However, these numbers also show that female promotions and voluntary separations of African Americans were not a problem that needed to be addressed. These numbers were in proportion to their representation in the workforce before the diversity program was implemented. Minority promotions exhibited a slight downturn, but the effect of the diversity program may have been to begin to smooth out what had been an uneven trend. Prior to implementation of the program, minorities were, at times, promoted significantly less than and, at times, greater than their representation in those grades. The diversity program appears to have had a positive impact on the disproportionate dismissal rate of African Americans.

Recommendations

Federal agencies have largely come around to believe that diversity programs are important, and they are devoting varying levels of resources to their development. The range of activities differs among them, appropriately so, given their differing missions, workforces, and other circumstances. They should be encouraged to continue to develop their own agency-specific programs. However, they should also be encouraged to collect and analyze empirical data to discover where disparities may be greatest, as well as to evaluate the impact of their

programs. We offer the following specific recommendations for federal agencies and their managers.

Recommendation One: All federal agencies should develop and implement diversity management programs consistent with their resources, mission, and unique needs.

It is clear that the American workforce is becoming increasingly diverse and its full potential will not be tapped by an organizational structure and culture that developed in an era when the workforce was largely white and male. The underlying purpose of diversity management programs should be to promote environments in which all employees are given the opportunity to succeed to the fullest extent possible, given their abilities and skills. The climate should facilitate the recruitment and retention of underrepresented groups. In this fashion, diversity programs will complement traditional equal employment opportunity recruitment efforts.

Each agency should be cognizant that its circumstances regarding diversity may be unique, and that the program it develops should be adapted to meet its particular concerns. A well-developed diversity program would include some or all of the following elements:

1. *Diversity training.* Ideally this training should confront the challenging issues of stereotypes and discrimination and the organizational structures that sustain them. Training should also focus on developing skills such as communication and conflict resolution. Some organizations require such training of all employees, or of all supervisors and managers, while others prefer to make attendance voluntary. Unfortunately, poorly conceived diversity training can (and has) caused more harm than good by increasing employee alienation and distrust of the organization. For that reason, agencies should take great care in developing training content and/or choosing contractors to provide it. Until an agency can be sure that the training will achieve its goals, it should not be made mandatory.
2. *Diversity council or board.* Whether representative of the agency by organizational component (as at NIST), or by occupational or interest group (as at NIH), a council can be a forum for airing and resolving diversity-related issues

and for making recommendations to the agency head. It will provide a unifying mechanism through which employee concerns can be identified and potential resolutions recommended. Its representative nature will add to the credibility of the policies it endorses for adoption by the agency head.

3. *Critical element in the performance plans of managers and supervisors.* All managers and supervisors should be held accountable for achieving diversity-related objectives. The objectives should not be as amorphous as, for example “fostering an inclusive environment.” Rather, they should be measurable and/or observable. In some cases, it may be appropriate to expect a manager to achieve an improvement in the ratio measures described in the previous section. In other cases, it may be enough to expect managers to undertake specific projects such as developing a career development or mentoring program, creating multicultural work teams, or engaging in the active recruitment of underrepresented groups.
4. *Mentoring opportunities.* Many employees who are successful in organizations identify and associate themselves with mentors who provide advice and guidance on career development. For some employees, this works best when they identify mentors who informally provide information and guidance. Others require a more formal and structured program. Regardless of approach, the agency should facilitate the establishment of these relationships for employees who want them, so that all employees enjoy access to career-enhancing information, advice, networks, and work-related opportunities.
5. *Reexamination of job qualifications, performance, and promotion criteria.* Agencies should critically assess qualification standards and promotion criteria to ensure that they don’t contain elements that may have been put in place some time ago and are no longer relevant. This is particularly important when these criteria have an adverse impact on particular groups of employees, such as minorities and women. An example might be requiring a specific degree such as a Ph.D. for a position when that is not really necessary for the effective performance of the

job. Informal criteria, such as perceived availability to work overtime or relocate, should also be reexamined in this light.

Recommendation Two: Agencies should make a clear distinction between diversity management and traditional EEO and affirmative action programs.

Traditional EEO and affirmative action programs are mandated by law and are targeted toward preventing and overcoming discrimination directed toward women, racial and ethnic minorities, and the disabled. As such, agencies should continue to provide them with sufficient autonomy and resources to pursue these objectives and their unfaltering focus on the continued inequities confronting these groups. Diversity programs should complement them, not replace them. Diversity programs often have much broader objectives and are not mandated by law. As such, they should be flexible enough to allow agencies to create and experiment with strategies aimed at addressing subtle barriers or obstacles that confront people from diverse backgrounds. In many cases, these barriers do not constitute legally proscribed forms of discrimination, and so would not be within the purview of an EEO program. This distinctive nature of diversity management may be best maintained when the EEO program and the diversity program have separate organizational identities, as at NIST. Even if housed in the same office, they should be seen as distinct programmatic efforts that have different general purposes and methods, even while sharing some common goals. Clearly, mechanisms should be established to enhance their cooperation and ensure they don’t step on each other’s toes in pursuing their highly related objectives.

Recommendation Three: Agencies should gather baseline data to guide diversity program efforts and to serve as a means for continuous evaluation of the impact of their diversity programs.

As discussed in some detail in this report, a well-developed diversity management program should produce identifiable outcomes that reflect the existence of an open and equitable work environment. In the previous section, we suggested that such outcomes should include equitable prospects for minority and female promotions from middle- and higher-level grades as well as reductions in disproportionate numbers of voluntary separations and

discharges of African-Americans. Agencies should collect and maintain the data necessary for construction of the promotion, quit, and discharge ratios proposed earlier. Early collection of these data will provide a basis for identifying problem areas requiring focused attention. These ratios should be tracked across time to determine if the diversity program is having its intended impact.

Diversity programs in federal agencies have come a long way from the scant attention they received in the early 1990s. Now most agencies are involved in an array of activities under the rubric of managing diversity. This report is intended to inform other agencies or public sector organizations interested in launching a diversity effort about how such efforts differ from traditional EEO and affirmative action, and the components they commonly include. We believe this information and the recommendations presented here can help agencies ensure their programs achieve a maximum return on their investment.

Appendix: A Time-Series Regression Model for the NIH

The interrupted time-series regression model provides an appropriate method for the analysis of data collected to assess the impact of agency diversity programs. In the model, the dependent variable (minority or female promotion ratios or black quit or dismissal ratios) is regressed on a time trend variable coded 0 (zero) at the point of the initiation of the program with negative values prior to the program and positive values afterwards. Additional independent variables are then added to the model to assess the short- and long-term impacts of the program.

The model is estimated using the following equation:

$$\text{Dependent Variable} = a + b_1X_1 + b_2X_2 + b_3X_3 + e$$

Where:

Dependent Variable = Minority Promotion Ratio
or
Female Promotion Ratio
or
Black Quit Ratio
or
Black Dismissal Ratio

a = the constant; i.e., it provides an estimated value of the dependent variable at the point where all independent variables are equal to zero (the year 1995 in this case) based on the preprogram trend.

X_1 = A counter for time, coded -7 for 1988, -6 for 1989, -5 for 1990 through 0 for 1995 (the year the program began), 1 for 1996, 2 for 1997, etc.

X_2 = An intervention variable coded 0 for years prior to the program (1988-1995) and 1 for years after the beginning of the program (1996-1999). This variable measures any change in the intercept at the time of the beginning of the program.

X_3 = An intervention variable coded 0 for years prior to the program (1988-95) and 1 for 1996, 2 for 1997, 3 for 1998, and 4 for 1999. This variable measures any change in the slope during the years following the program.

In the model, the parameter " a " is the estimated level of the dependent variable for the year 1995 based on the trend that occurred prior to the program. The coefficient b_1 provides the slope or rate of change in the dependent variable before the program. The parameter b_3 adjusts that slope as necessary to account for change that occurred following the program. Thus, the estimated slope for the post-program years is given by $b_1 + b_3$. The coefficient b_2 estimates any change in the intercept at the point of the initiation of the program that would indicate an immediate increase or decrease in the dependent variable.

The equation for the black dismissal ratio is:

$$\text{Black Dismissal Ratio} = 2.997 + .085X_1 - .256X_2 - .344X_3$$

These results indicate that prior to the diversity program at NIH, the black employees' share of dismissals relative to their share of the workforce was increasing (on average) by the amount of .085 per year. After the program began, however, there was an immediate decline in the black dismissal ratio (indicated by the coefficient on the variable X_2 of -.256) and the ratio continued to decline across time from 1996 to 1999, as illustrated by the coefficient of -.344 on the variable X_3 . Thus, we have a quantitative estimate of the extent to which the diversity program had the effect of ameliorating the problem of high dismissal rates for black employees.

Endnotes

1. Approximately 4.2 percent of the organizations with diversity programs had no useful response to this question.
2. Special emphasis programs focus on specific demographic groups such as Hispanics or women.

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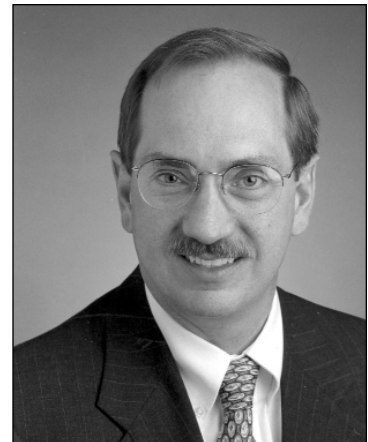
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