



**LIBRARY OF  
CONGRESS**

**Compilation of the Five Legislative  
Branch IGs' Reports on Their  
Respective Agencies' Diversity  
Programs for FY 2007**

**September 2008**





## ▶▶ TABLE OF CONTENTS

▶▶ Background .....	1
▶▶ Summary of Data.....	5
I. Progress Has Been Made in Improving the Representation of Women and Minorities in Senior Level and GS-15 Positions.....	6
1. Senior Level Representation .....	6
2. GS-15 Developmental Pool Representation.....	8
II. Legislative Branch Agencies Have Voluntarily Adopted Many of the Best Diversity Management Practices.....	10
III. Complaint and Discrimination Data are Generally Accurate and Complete.....	13
IV. The Diversity/EEO Offices Are Generally Independent of the General Counsel and Agency Head .....	14
▶▶ Agency Specific Recommendations .....	15



## » BACKGROUND

In November 2007, the Chairman of the Federal Workforce, Postal Service, and the District of Columbia Subcommittee of the House of Representatives' Oversight and Government Reform Committee issued a report titled "*Senior Executive Service: Women and Minorities are Underrepresented in Most Legislative Branch Agencies.*" This report discussed racial and gender diversity in the Senior Executive Service (SES) corps<sup>1</sup> in the six legislative branch agencies during fiscal year (FY) 2007. The report presented three key findings:

- The SES corps were less diverse in terms of minorities than the agencies' workforces as a whole, and in four of the agencies, less diverse in terms of women;
- The representation of minorities in the legislative branch SES corps was stagnant, with representation of women improving only slightly between FY 2002 and FY 2007; and
- General Schedule-15 successor pools at some of the agencies were less diverse than the SES corps.

In response to these findings, the Subcommittee Chairman requested in a letter dated November 14, 2007 that the legislative branch agencies' Inspectors General (IGs) review their agencies' diversity programs, specifically to:

- Identify and assess the diversity programs of legislative branch agencies to determine if they are yielding the desired results (creating a more diverse population of women and minorities in top leadership positions [SES and GS-15]);
- Evaluate the accuracy and completeness of the complaints and discrimination data being reported to the Congress; and
- Assess to what degree the diversity offices are independent of their agency's general counsel and agency head.

To respond to the Chairman's request, IGs from five legislative branch agencies (Architect of the Capitol [AOC], Government Accountability Office [GAO], Government Printing Office [GPO], Library of Congress [LOC], and the United States Capitol Police [USCP]) conducted reviews of their respective agencies' management

---

<sup>1</sup> The SES designation is used only by GAO.

of workforce diversity, and specifically the management of senior level positions. The House of Representatives' IG and the Congressional Budget Office (another legislative branch agency) did not participate in this review.

The IGs' reviews culminated in five individual agency reports. This report presents a summary of the data for all the reports.<sup>2</sup> Each report contains recommendations for improvement at the respective agency.

Overall, the reviews found that resources dedicated to diversity management vary significantly among the agencies. Likewise, each agency varies in the diversity

Figure 1. Background Data for Fiscal Year 2007					
	AOC	GAO	GPO	LOC	USCP
Total Agency Staff	2,298	3,121	2,291	3,786	2,001
Diversity/EEO/AA Office staff positions	7	6	7	16	0
No. Senior Level Positions	27	126	26	95	21
Follows the Office of Compliance alternative dispute resolution program established by the Congressional Accountability Act.	Yes	No	No	No	Yes
1. 1,587 sworn officers and 414 civilians as of September 30, 2007. 2. In GAO, SES positions and their equivalents are SES, Senior Level, and executive schedule positions. 3. USCP does not have general schedule or SES position classifications. For senior level positions, USCP included equivalent graded USCP employees CP 14 and 15, administratively determined positions, and Deputy Chiefs.					

and affirmative action policies, procedures, and practices, as well as legislative direction it follows. For example, the Office of Compliance (OOC) administers the AOC's and the USCP's dispute resolution program, whereas other agencies administer their own programs. Figure 1 details some of these differences.

To respond to the Chairman's three concerns, the five IGs developed a common audit/review plan or program. Although legislative branch agencies are not required to follow Equal Employment Opportunity Commission (EEOC) directives, the IGs used EEOC guidance and a GAO report on leading practices (*Diversity Management: Expert-Identified Leading Practices and Agency Examples* (GAO-05-90) issued January 2005) as criteria because both provide policy and standards for establishing and maintaining effective diversity programs.

<sup>2</sup> AOC IG, *Diversity Management Program and the Underrepresentation of Women and Minorities*, July 2008; GAO IG, *Diversity at GAO: Sustained Attention Needed to Build on Gains in SES and Managers*, GAO-08-1098, September 2008; GPO IG, *Audit of Diversity Management Programs at the GPO*, Report No. 08-10, September 2008; LOC IG, *Review of the Library's Diversity Management Program*, Report No. 2008-SP-104, July 2008; USCP IG, *Audit of United States Capitol Police Workforce Diversity*, Report No. OIG-2008-05, July 2008.

To determine whether the diversity programs and initiatives were achieving desired results, we asked diversity officials at each agency to complete the EEOC's Management Directive-715's (MD-715) Self-Assessment checklist<sup>3</sup> after first modifying the checklist to eliminate questions applicable only to executive branch agencies. We also compared each agency's diversity programs and initiatives with leading diversity management practices identified in GAO's report.

We interviewed agency officials to obtain insight on the diversity management programs and initiatives, focusing on specific initiatives on women and minority representation in Senior Level Executive and GS-15 positions. We also examined the measures used to assess the success of diversity management. To determine if the legislative branch agencies' diversity programs are creating a more diverse population of women and minorities in top leadership positions, we examined trends over the last five years.

To assess the accuracy and completeness of the complaint and discrimination data and the information systems that produce that data, we collected data using GAO's *Plan for Data Reliability Assessment*. We note that providing ethnicity and race information is voluntary, but in the instance of missing information, agencies will attempt to identify an employee's race and ethnicity by visual observation.

To assess the extent to which the diversity offices are independent of their agency's General Counsel and the agency head, we used EEOC Management Directive 110, Chapter 1, Section III, *EEO Director - Independent Authority and Relationships* (MD-110) as criteria. This guidance describes in detail the procedures that executive branch agencies must follow when processing complaints of discrimination filed by federal employees and applicants for federal employment alleging employment discrimination. Although the legislative branch is not subject to this guidance, we believe it represents a best practice.

The five reports discuss the diversity programs in effect as of January 1, 2008. The complaint and discrimination data collected pertained to FY 2007. This data included the number of complaints filed, the number of complainants, and a breakdown of the basis for the

---

<sup>3</sup> This directive provides policy guidance and standards for establishing and maintaining effective affirmative action programs of equal employment opportunity, Section 717 of Title VII (PART A), and effective affirmative action programs under Section 501 of the Rehabilitation Act (PART B).

complaints. For trend analysis, the agencies used personnel data for FY 2002 to FY 2007 that included a breakdown of positions by gender and race/ethnicity.

Review steps and tests unique to each agency are described in more detail in each agency's individual report. Likewise, background information on policies, practices, and regulations unique to an agency are contained in each individual report; we urge the reader to refer to individual agency reports for more detail.

## » SUMMARY OF DATA

Officials in the five legislative branch agencies in this report have taken steps to improve diversity in their agencies. Each of the five agencies has increased the percentage of women in their senior level executive corps over the past five years. Likewise, the AOC and GPO have increased minority representation in senior level positions since FY 2002. The other three agencies' minority representation has either been relatively stable or experienced a slight decrease; however, their overall minority representation was generally higher than the AOC and GPO. The agencies have generally made strides in improving diversity in developmental pools, particularly in the representation of women. This bodes well for the future especially because GS-15 or equivalent positions are widely considered the developmental pool for senior level jobs.

The IGS found that although not required to comply with EEOC MD-715, each agency is voluntarily following most of the best diversity management practices recommended by the GAO and by the EEOC.

With the exception of the GAO, results of tests showed that FY 2007 complaint and discrimination data are accurate and complete. The IGS also concluded that their respective diversity offices are independent of their General Counsels, and, to the extent practical, the agency head.

The following sections provide a summary of each agency's diversity data for senior level and GS-15 or equivalent positions, an overview of their diversity practices, the accuracy of the EEO data, and an assessment of the independence of the diversity offices. Also included are summaries of the recommendations contained in each IG's report.

**I. Progress Has Been Made in Improving the Representation of Women and Minorities in Senior Level and GS-15 Positions**

In FY 2007, diversity in the five legislative branch agencies senior level corps compared favorably with government-wide statistics for career SES employees, especially for African-Americans. Moreover, most agencies have improved diversity in upper level positions in the past five years.

Employment trends are up for women in senior level and GS-15 positions in all agencies over the 2002 to 2007 period. For minorities, the trends are mixed.

*1. Senior Level Representation*

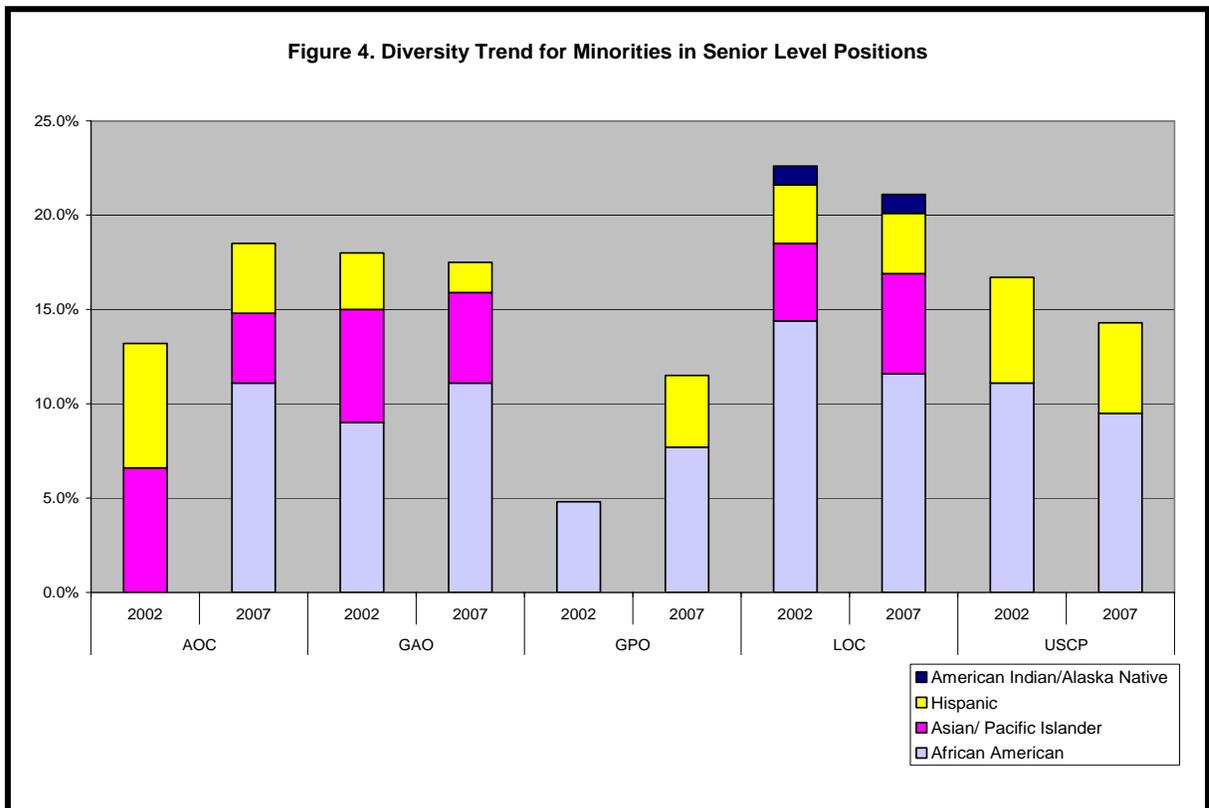
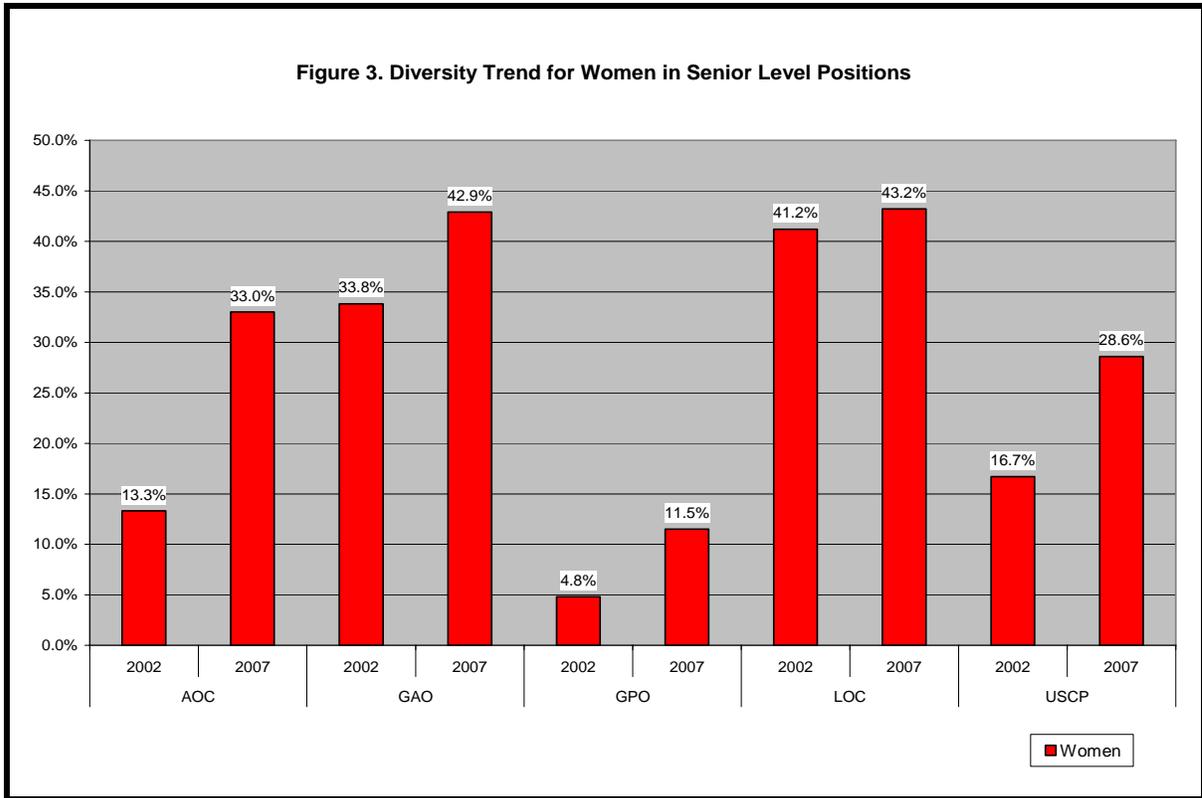
In fiscal year 2007, representation of women and minorities in the senior level positions generally exceeded the rates in the government-wide SES<sup>4</sup> and were generally less than the civilian labor force rate.<sup>5</sup> However, the percentage of African Americans in senior level positions is comparable to both the civilian labor force and the government-wide SES rates. Figures 2, 3, and 4 present the trend data for the past five years.

**Figure 2. Breakdown of Senior Level Positions as of Fiscal Years 2002 and 2007**

	EEO Group	AOC		GAO		GPO		LOC		USCP	
		2002	2007	2002	2007	2002	2007	2002	2007	2002	2007
Gender	Men	13	18	88	72	20	23	57	54	15	15
	Women	2	9	45	54	1	3	40	41	3	6
	Total	15	27	133	126	21	26	97	95	18	21
Racial/ Ethnic Group	African American	0	3	12	14	1	2	14	11	2	2
	American Indian/ AK Native	0	0	0	0	0	0	1	1	0	0
	Asian/ Pacific Islander	1	1	8	6	0	0	4	5	0	0
	Hispanic	1	1	4	2	0	1	3	3	1	1
	Total Minorities	2	5	24	22	1	3	22	20	3	3
	White	13	22	109	104	20	23	75	75	15	18
	Total	15	27	133	126	21	26	97	95	18	21

<sup>4</sup> SES data is based on the GAO analysis of the Office of Personnel Management's Central Personnel File, GAO Report No. GAO-08-725T.

<sup>5</sup> Civilian Labor Force (CLF) data derived from the 2000 decennial census reflecting those persons 16 years of age or older who were employed or seeking employment, excluding those in the Armed Services.



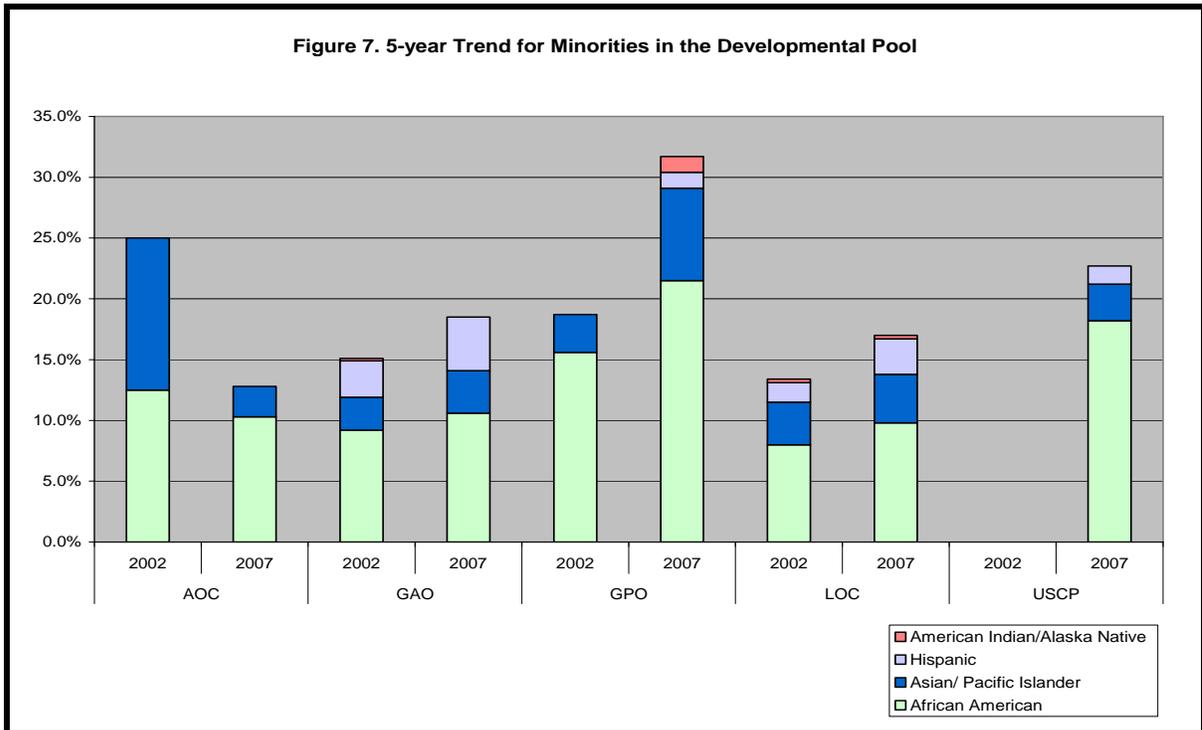
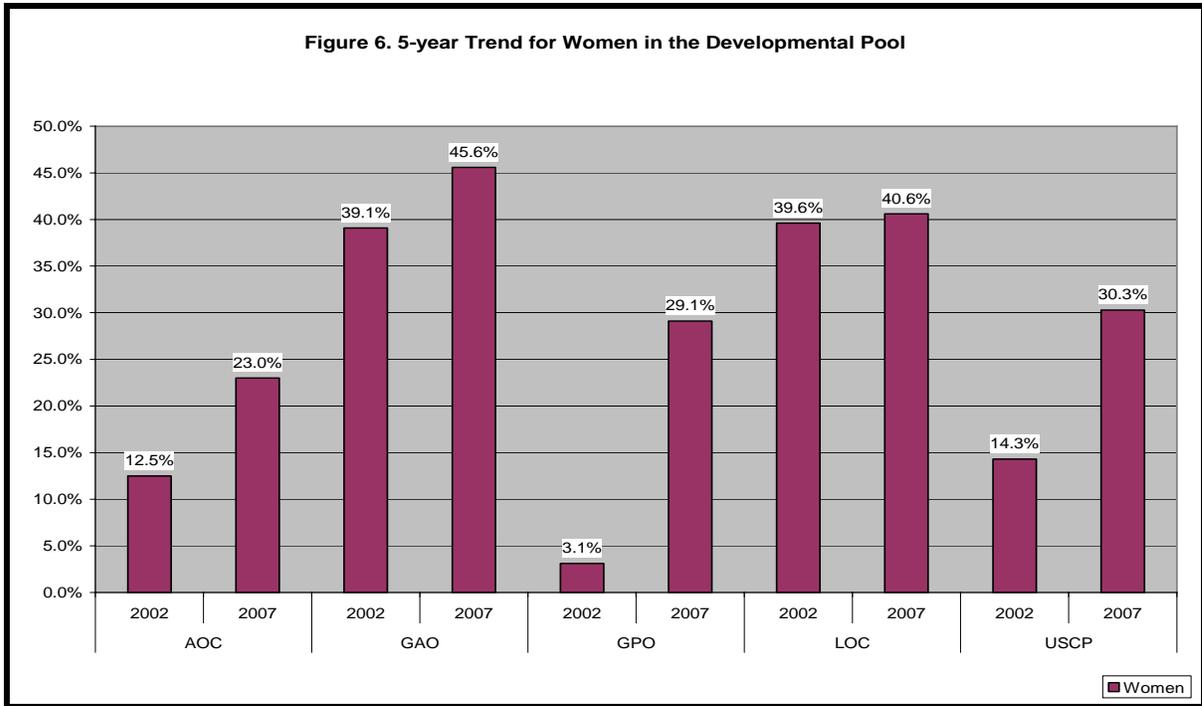
2. GS-15 Developmental Pool Representation

For the GS-15 or equivalent developmental pool, the diversity range within the five agencies is similar to government-wide statistics. Figures 5, 6, and 7 present trend data for the 2002 to 2007 five year period.

**Figure 5. Breakdown of GS-15 or Equivalent Positions as of Fiscal Years 2002 and 2007**

	EEO Group	AOC		GAO <sup>6</sup>		GPO		LOC		USCP	
		2002	2007	2002	2007	2002	2007	2002	2007	2002	2007
Gender	Men	12	30	344	322	31	56	188	224	24	46
	Women	4	9	221	270	1	23	123	153	4	20
	Total	16	39	565	592	32	79	311	377	28	66
Racial/ Ethnic Group	African American	2	4	52	63	5	17	25	37	0	12
	American Indian/ AK Native	0	0	1	0	0	1	1	1	0	0
	Asian/ Pacific Islander	2	1	15	21	1	6	11	15	0	2
	Hispanic	0	0	17	26	0	1	5	11	0	1
	Total Minorities	4	5	85	110	6	25	42	64	0	15
	White	12	34	480	482	26	54	269	313	28	51
	Total	16	39	565	592	32	79	311	377	28	66

<sup>6</sup> GAO's equivalent to GS-15 positions are Band-III analysts and specialists (Assistant Directors), Level II managerial and supervisory positions, Level-IV professional technical specialists, and Band-III attorneys (equivalent to Band-II Attorneys in 2002-2004). USCP's equivalent positions are CP 12/13, captains, and inspectors.



## II. Legislative Branch Agencies Have Voluntarily Adopted Many of the Best Diversity Management Practices

Each IG determined that their respective agency has voluntarily adopted most of the model practices recommended by the GAO and the EEOC in MD-715. Although MD-715 does not apply to the legislative branch, lacking other guidance, we believe it provides useful criteria to evaluate whether the legislative branch is establishing and maintaining effective EEO and diversity management programs.

Each IG determined that their respective agency head is committed to diversity and that each agency is performing or plans to perform succession planning (a strategic process for identifying and developing a diverse pool of talent for an organization's potential future leaders).

Figures 8, 9, and 10 provide an overview for the five agencies' diversity practices. Included in the MD-715 assessment are detailed questions for each of the six essential elements. Figure 9 presents a summary of the six essential elements contained in the EEOC's MD-715. Figure 10 details more specific parts of the MD-715 essential elements. Additionally, Figure 10 includes several best practices identified in a December 2001 study conducted for the PricewaterhouseCoopers Endowment for The Business of Government, titled *A Changing Workforce: Understanding Diversity Programs in the Federal Government*.

**Figure 8. Assessment of Whether the Legislative Agency Diversity Offices are Adopting the GAO's 9 Best Leading Diversity Management Practices Identified by Leading Experts**

Leading Diversity Management Practices	AOC	GAO	GPO	LOC	USCP
<b>Top leadership commitment</b> —a vision of diversity demonstrated and communicated throughout an organization by top-level management.	✓	✓	✓	✓	✓
<b>Diversity as part of an organization's strategic plan</b> —a diversity strategy and plan that are developed and aligned with the organization's strategic plan.	✓	✓		✓	✓
<b>Diversity linked to performance</b> —the understanding that a more diverse and inclusive work environment can yield greater productivity and help improve individual and organizational performance.	✓	✓		✓	✓
<b>Measurement</b> —a set of quantitative and qualitative measures of the impact of various aspects of an overall diversity program.	✓	✓		✓	✓
<b>Accountability</b> —the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives.	✓	✓		✓	✓
<b>Succession planning</b> —an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization's potential future leaders.	✓	✓	✓	✓	✓
<b>Recruitment</b> —the process of attracting a supply of qualified, diverse applicants for employment.	✓	✓		✓	✓
<b>Employee involvement</b> —the contribution of employees in driving diversity throughout an organization.	✓	✓		✓	✓
<b>Diversity training</b> —organizational efforts to inform and educate management and staff about diversity.		✓		✓	✓
Rating Scale: ✓ = Adopted or planning to adopt					

**Figure 9. Assessment of Whether Each Agency is Practicing the EEOC's Management Directive 715 Essential Elements**

Essential Elements	AOC	GAO	GPO	LOC	USCP
Demonstrated Commitment from Agency Leadership	✓	✓	✓	✓	✓
Integration of EEO into the Agency's Strategic Mission	✓	✓		✓	✓
Management and Program Accountability	✓	✓		✓	✓
Proactive Prevention	1	✓			✓
Efficiency	1		✓	✓	✓
Responsiveness and Legal Compliance	✓	✓	✓	✓	✓
Rating Scale: ✓ = Generally following the essential element. 1. The AOC has adopted certain elements as appropriate.					

<b>Figure 10. Summary of Agencies Following Best Practices for Diversity Management</b>					
<b>Best Practice</b>	<b>AOC</b>	<b>GAO</b>	<b>GPO</b>	<b>LOC</b>	<b>USCP</b>
Diversity Program housed separate from the EEO Office?				✓	1
Agency has a diversity action or strategic plan?	✓	✓		✓	✓
Agency is conducting targeted recruitment and outreach efforts to attract potential under represented minority employees?	✓	✓	✓	✓	✓
Mentoring program?		✓	✓	✓	✓
Includes awareness events (e.g. special emphasis functions)?	✓	✓	✓	✓	✓
Includes a diversity council?		✓		✓	1
Agency encourages the development of formally or informally constituted groups representing specific categories of employees such as women, African Americans, or gays and lesbians?		✓	✓	✓	
Includes focus on conflict management (e.g. alternative dispute resolution or mediation)?	✓	✓	✓	✓	2
Diversity training required for managers and supervisors?		3		✓	2
Diversity training included in employee orientation?		✓			
Have administered attitude survey as part of assessment?		✓	✓		
Diversity element in supervisors/managers performance plans?	✓	✓		✓	✓
Are management/personnel policies, procedures, and practices examined at regular intervals to assess whether there are hidden impediments to equal opportunity?		✓	✓	✓	
Does the EEO Director have the authority and funding to ensure implementation of agency EEO action plans?	✓	✓	✓	✓	1
The agency tracks the race, national origin, and sex of applicants for both permanent and temporary employment?	✓	✓		✓	✓
The agency tracks the rates of selections for promotions by race, national origin, and sex?	✓	✓			✓
The agency tracks the rates of training opportunities (hours per year) by race, national origin, and sex?				✓	1
The agency tracks the rates of performance incentives (monetary awards, step increases) by race, national origin, and sex?	✓	✓			1
The agency tracks the rates of complaints by race, national origin, and sex to see if a particular group has more complaints about promotions, disciplinary actions, performance appraisals, or awards?	✓	✓	✓	✓	2
The agency tracks the rates of both voluntary and involuntary separations from employment by race, national origin, and sex?	✓	✓		✓	✓
<p>Rating Scale:</p> <p>✓ = Generally following</p> <p>1. USCP does not have a formal diversity or EEO office or a monetary awards program.</p> <p>2. USCP follows the Office of Compliance (OOC) alternative dispute resolution program established by the Congressional Accountability Act.</p> <p>3. GAO is planning to adopt.</p>					

**III. Complaint and Discrimination Data  
are Generally Accurate and Complete**

To evaluate the accuracy and completeness of the complaints and discrimination data being reported to the Congress and the information systems that produce that data, we collected data using GAO's *Plan for Data Reliability Assessment*. Additionally, we used responses to questions in the MD-715 self assessment pertaining to this data. Overall, the agencies have an effective management control system to ensure timely, accurate, complete, and consistent reporting of EEO complaint data.

<b>Figure 11. Tracking and Reporting the Number and Status of Discrimination Complaints</b>					
	AOC	GAO	GPO	LOC	USCP
Does the agency have a system of management controls in place to ensure the timely, accurate, complete, and consistent reporting of EEO complaint data?	✓	✓ 2	✓	✓	1
Does the agency use a complaint tracking and monitoring system that allows identification of the location and status of complaints, and length of time elapsed at each stage of the agency's complaint resolution process?	✓	✓	✓	✓	1
Does the agency's tracking system identify the issues and bases of the complaints, the aggrieved individuals/complainants, the involved management officials, and other information to analyze complaint activity and trends?	✓	✓	✓	✓	1
Reporting Scale: ✓ = Yes 1. USCP follows the Office of Compliance (OOC) alternative dispute resolution program established by the Congressional Accountability Act and as such the OOC reports discrimination data to Congress. 2. While GAO has a system of management controls, GAO's IG reported that the agency has not made full use of these controls. Agency management is in the process of addressing the IG's concerns.					

Of the five, GAO is the only agency required by the Notification and Federal Employee Antidiscrimination and Retaliation Act (No FEAR Act) of 2002 to provide data on its complaints and discrimination cases annually in a report to Congress and to post updates of current fiscal year data on its Web site. In GAO's March 2008 annual report, the GAO IG found errors in the FY 2007 data for the number of complaints, the number of GAO employees who filed complaints, and the basis of the complaints (such as race, gender, and religion). The IG also could not verify the FY 2007 data reported for complaint processing times. In addition, when GAO posted complaint data earlier this year on the agency's intranet and Web site, it inadvertently published first quarter FY 2008 complaint

data as if it were the full year data for FY 2007. The posted data also included errors regarding the basis of complaints and the complaint processing times. GAO has corrected the data and posted the updated data to both its Web site and intranet. The GAO IG determined that these and other errors largely resulted from insufficient controls over the compilation and reporting of the data, including not making full use of its electronic complaint software.

**IV. The Diversity/EEO Offices Are Generally Independent of the General Counsel and Agency Head**

EEOC MD-110, Chapter 1, Section III., *Agency and EEOC Authority and Responsibility, EEO Director - Independent Authority and Relationships* requires 1) direct reporting to the agency head, 2) separation of duties (i.e. manager of EEO complaint discrimination process must be different from manager with personnel functions), and 3) legal sufficiency review should be done by a unit separate from the legal unit that will represent the agency in court. Although the legislative branch agencies are not subject to EEOC directives, we believe the guidance in MD-110 is a best practice that legislative agencies should model. Figure 12 details the results from each IG report.

<b>Figure 12. Independence of the EEO/Diversity Office</b>					
	AOC	GAO	GPO	LOC	USCP
Has the agency placed the EEO Director in a direct reporting relationship with the head of the agency?		✓	✓	✓	1
Does the EEO Director/Officer have a regular and effective means of informing the agency head and other top management officials of the effectiveness, efficiency, and compliance (with agency regulations or EEOC Directives, if applicable) of the agency's EEO program?	✓	✓	✓	✓	1
Are the EEO investigative and decision making processes separate from the personnel function?	✓		✓	✓	✓
Are the legal sufficiency reviews done by a unit separate from the legal unit that will represent the agency in court?		✓	✓	✓	
Does the agency offer Alternative Dispute Resolution or mediation?	✓	✓	✓	✓	2
Reporting Scale: ✓ = Yes 1. USCP does not have a formal diversity or EEO office. 2. USCP follows the Office of Compliance (OOC) alternative dispute resolution program established by the Congressional Accountability Act.					

## ▶▶ AGENCY SPECIFIC RECOMMENDATIONS

### **Architect of the Capitol:**

The AOC report included 15 recommendations to improve agency diversity. These recommendations were made to address findings and were designed to:

- Improve senior level recruitment actions to include a report on the diversity of the applicant pool;
- Improve internal controls over the agency's decentralized applicant selection and hiring process; and
- Ensure that the EEO Office is more involved in the review and development of diversity issues, including training, and is identified as having the primary responsibility for the AOC diversity program. As part of the EEO role, the EEO Director regularly meets with the Architect of the Capitol to discuss diversity initiatives and progress on those initiatives, benchmarks AOC diversity efforts against similar organizations, and sets goals and monitors progress towards reaching a more diverse workforce.

In response to the report, the Acting Architect of the Capitol developed an action plan designed to improve the diversity of the workforce.

### **Government Accountability Office:**

Although GAO has made progress, the task ahead—further increasing the diversity of its leadership and workforce—is challenging and will require a concerted effort that must be sustained over time. To move forward, GAO needs to establish as part of its long-term approach, an annual plan that evaluates its workforce data and helps identify and remove unnecessary barriers to the advancement and hiring of women, minorities, and people with disabilities. The agency has taken a key step toward this end with its June 2008 Workforce Diversity Plan and the Acting Comptroller General's stated intention to producing a diversity plan annually. Because of GAO's transitional state with an Acting Comptroller General, we believe the agency needs to formally incorporate its intention into the order governing the Office of Opportunity and Inclusiveness' (OOI) responsibilities. By formally adopting the MD-715 annual review and evaluation process, GAO

will be better able to evaluate the effects of its initiatives, use the evaluations as a basis for any strategic improvements, and hold agency leadership accountable. We recommend that the Acting Comptroller General take the following two actions:

- Establish as agency policy the development of an annual diversity plan that includes the evaluation of the agency's workforce, identifies and removes unnecessary barriers to advancement and hiring, and is comparable to the requirements outlined in EEOC's MD-715.
- Use information from its annual diversity plan to hold agency leadership accountable for the overall results of the agency's diversity efforts.

GAO's FY 2007 complaint and discrimination data had errors in its March 2008 annual report to Congress and Web posting. In addition, the IG could not verify the reported average number of days that GAO spent processing complaints. To improve the accuracy and completeness of the complaint and discrimination data reported to Congress and others, we recommend that the Acting Comptroller General take the following two actions:

- Revise GAO's complaint processing procedures order to clarify responsibility for tracking and reporting on the processing of complaints against a person within OOI.
- Strengthen internal controls for tracking, reviewing, and reporting on complaints.

GAO management concurred with the recommendations.

**Government Printing Office:**

The GPO IG made a total of 15 recommendations to agency management to adopt all or a combination of the provisions of MD-715 and the leading diversity management practices identified by the GAO. Included in the recommendations was:

- A continued commitment by the agency head to EEO and a discrimination-free workplace;
- Integration of EEO policy and practices into the agency strategic plan and managers' performance standards;

- To maintain and provide sufficient resources to assist EEO officials with identifying and eliminating barriers; and
- To empower all employees to get involved in diversity management.

Implementation of these recommendations should not only improve the GPO diversity program by providing a more diverse population of qualified women and minorities in top leadership, but also contribute to GPO's ability to meet its future employment challenges. GPO management concurred with the recommendations.

**Library of Congress:**

The LOC IG recommended that the agency's Office of Workforce Diversity assess its diversity program annually using the EEOC's MD-715. This includes developing a detailed plan to attain the essential elements in the model program that have not been achieved. The IG also recommended that the LOC:

- Increase its focus on barrier analysis and measuring program effectiveness;
- Complete its succession planning efforts;
- Organize a facilitative workshop with program supervisors, Human Resources Services, and Office of Workforce Diversity staff to discuss identified barriers;
- Convene a Hispanic Employment Work Group to develop sound strategies to improve Hispanic representation; and
- Conduct exit interviews to determine why staff leave and identify employee perceptions about organizational commitment to diversity.

Regarding complaint data, the IG recommended that the LOC make its "No FEAR" data available to staff via its staff intranet Web site and benchmark this data against other federal agencies of similar size. LOC management concurred with the recommendations.

**United States Capitol Police:**

The USCP IG made four recommendations for more effective and efficient strategies to assist women and minorities in advancing to executive level positions within the organization. Specifically, the IG recommended that USCP finalize its Human Capital Strategic Workforce Plan identifying the critical executive level and supervisory/management positions and the needed skills and abilities required for its future diverse workforce. In addition, the IG recommended that USCP consider outsourcing investigations of discrimination complaints or obtain formal training for EEO investigators and determine whether the duties of legal sufficiency reviews and agency/Board representation in equal employment opportunity complaints are incompatible and impair independence, either in fact or appearance with respect to EEO complainants.