

Planning, Implementing and Evaluating an Affirmative Action Program

A careful planning process establishes a means of deciding which problems are most pressing and which have the best chances of being resolved, and the order in which that resolution is likely to occur. A good implementation process involves everyone who can affect the affirmative action program for equal employment opportunity.

Overview of Planning Process

Typically, the planning process has five steps:

1. Assessment of affirmative action needs;
2. Assessment of affirmative action opportunities;
3. Setting priorities and developing strategies;
4. Implementing the program; and
5. Evaluating the program.

Assessment is the process of gathering and analyzing data to give a sufficiently detailed picture of the problems, if any, a program needs to address. A careful assessment lays the groundwork for establishing priorities and developing strategies. The involvement of interested persons and groups in a detailed assessment of problems is also a means of gaining recognition and support from managers, supervisors and employees.

The assessment of resources is the consideration of all the factors that can affect change(s) in the program. These factors include:

- The number of appointment opportunities anticipated;
- An analysis of the previous program indicating the activities that did or did not work;
- The staff time and money that is available; and
- The commitment of key officials to the program.

High sounding phrases or good intentions do not constitute a working or workable plan of action. It is necessary to be specific, thorough, objective, fair-minded and farsighted in order to accomplish the objectives of an effective Affirmative Action Program.

Establishing priorities and developing strategies follow directly from the assessment of problems and resources available to counter and address problems. To set priorities is to decide which problems should be addressed first. Such decisions should be made on the basis of each problem's severity and its potential for resolution.

Developing and choosing strategies is the process of deciding the best means to solve the problems identified in the assessment as having the highest priority. This involves analyzing all potentially effective strategies, past experience, evaluation results, research and the results of the assessment of resources. The strategies that are most suited and likely to be effective in light of those factors should be selected and pursued so long as the plan is narrowly tailored to correct lingering effects of past discrimination.

Implementation is the undertaking of specific actions designed to affect the goals previously identified. Inherent in that process is the need to take the necessary steps to put those forces in motion, and assure that the effectuation of those forces is consistent with the plans/strategy devised.

Evaluation can occur at regularly scheduled intervals or it can be continuous. In any case, it is a necessary element of any meaningful program which seeks to effectuate equal employment opportunity/affirmative action in employment. Before implementation, certain measures of effectiveness are designed. These measures may include numerical goals and timetable, surveys of those affected by the program, or any other means designed to measure the results of the program's implementation. The results of the activities must also be evaluated in terms of the program's overall objectives. Do the results of the program's activities solve the problems the program was set up to solve? The lessons learned from an evaluation of how well certain strategies and activities work should be used in modifying priority setting and planning of both long-term objectives and annual numerical and program goals.

An affirmative action program is usually most effective when it follows the basic planning and implementation steps outlined above.

Assessment of Affirmative Action and Equal Employment Opportunity Needs

Assessing needs in an affirmative action plan is first accomplished through the use of statistics. The representation of minorities and women is determined for each EEO Category in the agency. That representation is then compared with the workforce availability of minorities and women in an effort to determine where, if any, inference of adverse impact occurs.

An agency's representation compared to parity figures provides a rough estimate of the effectiveness of previous equal employment opportunity efforts. The first step in assessment is identifying any lingering effects of past discrimination in the agency work force. Reports have been prepared by the Office of Personnel Service that statistically indicated the representation of minorities and females in your agency by EEO job category.

Some agencies also collect data for reports used only within the agency that show appointment, transfer, promotion, and termination statistics. Agency managers and EEO Coordinators should evaluate all information available to identify those areas where a lingering effect of past discrimination exist, employment patterns and trends and areas in which turnovers are occurring that have a disproportionate impact upon persons in a protected group. Having such information allows the agency use of the best data available in planning, monitoring and evaluating program efforts and results.

Assessment of Opportunities

There are two aspects of planning which should be kept in mind when assessing affirmative action opportunities based upon inference of adverse impact. The first is projecting vacancies and appointments. The second is finding out the resources and strategies available for the affirmative action program.

Projecting Vacancies and Appointments

To determine if inference of adverse impact in job classifications has occurred, refer to the statistical reports provided by the Office of Personnel Services. Identify the typical number of appointments made to each category or class during the preceding year or over several years. Look at any internal reports that are available, such as those showing hiring and promotion of full or part-time employees by job category or classification. In order to project appointments, look at the rates of hiring in a class or category, then try to see what, if any, factors may change that rate. Factors that may affect hiring rates include:

- Increases or decreases in budgeted positions
- Agency or statewide hiring freezes or layoffs
- Adding, expanding or discontinuing programs

Considering these factors, project the number of appointments to be made to each class or category during the planning period.

An additional step in assessing opportunities is a determination of the resources and program activities available to the affirmative action program. In order to assess the resources available to the program, contact top management to discuss:

- What the funding will be for the affirmative action program;
- The amount of time other agency human resource staff plan to spend on affirmative action activities (e.g. recruiters, human resource managers, supervisors releasing employees for training, etc.);
- What agency activities are being planned to which affirmative action goals and objectives can be linked (e.g. a complete classification review, a new program involving extensive hiring or the development of a new operations manual);

- Assess the availability of minorities and women for hire or promotion. Use workforce, payroll and civilian labor force information to determine; and
- Where pools of protected group employees may be found and when, or if, there has been recent training that will qualify and/or prepare minorities and women for promotion.

Do not underestimate the number of appointment opportunities which occur annually. Compare past projects of appointments against appointments actually made. In many instance, appointment estimates may have been below the appointments actually made during the period.

Assessing Strategies

Once typical appointment rates have been assessed, decide which activities and strategies are most likely to be effective using that information.

Consider:

How the positions in each category or class are filled (e.g., primarily from notice of vacancies, by transfer, by promotions, etc.);

If a promotional class is involved, what classes are appointees promoted from? Also note the protected group composition of the classes from which most people promote.

Setting Priorities and Choosing Strategies

Establishing priorities is the heart of the planning process.

A priority in affirmative action is a planned activity that addresses an immediate and important need in the agency to correct the lingering effects of past discrimination that has a realistic chance of being implemented.

Priorities provide immediate, as well as somewhat less immediate, directions for an agency. Those activities will serve to advocate the planning and policy making processes of the future.

When establishing priorities, identify the possible target classes for affirmative action and list possible strategies and activities as a guide. Consider these factors:

- Whether the planned strategy is long range, with results more than a year away, or will there be immediate impact;
- Are resources available for the activity; and

- Whether support in the agency is available and the degree and nature of the support.

While assessing opportunities for affirmative action, it is important to remember that others in the agency may have other priorities. When looking for available resources, keep in mind how affirmative action goals can be integrated or strengthened when the priorities of other people and programs in the agency cause movement/activities which benefit what might otherwise be competing interests.

Numerical Goals and Timetables

A goal is simply a statement of what is sought to be accomplished.

A timetable sets the time you expect the affirmative action program will take to reach the goal.

Goals and timetables are a numerical way of setting priorities. Agencies may set narrowly tailored goals and timetables based upon the assessment of equal employment opportunity and affirmative action objectives to correct the lingering effects of past discrimination.

Setting Affirmative Action Goals

1. Determine the estimated number of vacancies in the planning period for each EEO Category of positions.
2. Note any adverse impact for each group.
3. Consider the availability of qualified persons in the protected group.
4. Consider other relevant factors.

Choosing target classes for affirmative action is an integral part of setting priorities. Criteria for identifying a particular group or category as a target class include the consideration of:

- Whether there is under-representation for one or more of the protected groups.
- No under-representation, but the class or category can provide candidates for upward mobility into an under-represented class or category.
- Having enough vacancies per year that affirmative action efforts will result in significant representation increases.

- Whether there is a potential applicant pool of protected group or persons that can meet the required and preferred skills of the position or if the preferred skills of the position can be revised to attract more applicants.

Implementing the Program

Implementing an affirmative action program requires the following:

1. The role of all persons involved in the program be defined in terms of that role and what is expected of that person;
2. The persons involved be engaged in meaningful activity which provides maintenance for the program, and;
3. The design and implementation of ways to assess the program's performance and effectiveness.

Establishing roles and responsibilities in any affirmative action activity involves deciding who will be involved in each activity, finding out how much time they can make available to you and agreeing on how they will spend that time.

Relating Numerical Goals to Selection Planning

In the process of making a thorough assessment of the agency's affirmative action program's needs, based on the analysis, and in determining priorities and strategies, it will be necessary to identify the obstacles to effective affirmative action and, likewise, the modifications necessary to overcome those obstacles.

The way to accomplish numerical goals and objectives for equal employment opportunity is by prioritizing and acting on the obstacles or required modifications that have been identified. If attempting to change all elements that inhibit optimum affirmative action or upward mobility progress at once, efforts and attention will scatter and the resources that are available in any period of time will usually be insufficient. Prioritize the actions or planned strategies.

Generally this process offers the most structured approach for addressing human resource management needs. In this respect, it is very important that the agency's affirmative action program be reflective of numerical goals and its other affirmative action related needs.

The achievement of goals will depend on the extent to which the agency is successful in assuring that affirmative action needs are addressed through appropriate planning systems and procedures.

In summary, for an effective affirmative action program, it is important to work well with different people and keep everyone involved in the program.

Evaluating the Program

The final step in implementation is the assessment and evaluation of program progress. Every affirmative action program should complete a regular interval evaluation of progress throughout the year. Several different measures of effectiveness should be used to develop a sense of where the program is working well and where it needs to be improved. Some measures of effectiveness are:

- Periodic assessment of whether hiring rates and net increases in representation goals are being met.
- Periodic assessment of how resources allocated to the program have been spent;
- Discussions with all those involved in the program to get their view of areas where the program is working well and of problem areas;

The periodic assessment of the affirmative action program should do four things:

1. Measure the results of the program and compare them to the program goals and policies.
2. Assess the effectiveness of the various program strategies and activities.
3. Find out why strategies and activities had good, bad or indifferent results.
4. Provide information which will serve as a basis for developing the agency's plan for the next activities.

The EEO Coordinator and managers should take primary responsibility for conducting the evaluation for the program. Evaluation is an internal management tool for the use of affirmative action staff and department management. Before beginning the evaluation, the EEO Coordinator should secure the support of the agency head. The results of the evaluation, along with pertinent comments, should be submitted to the agency head for review.

For each program activity, ask these questions:

- What were the results of the activity?
- Did the results meet expectations?
- Why was the activity successful/unsuccessful?

All activities in these areas of the affirmative action program should be evaluated:

Classification

Recruitment

Application

Certification and Selection

Training, Promotion, Transfer and Turnover/Retention

Work Environment and Complaints of Discrimination

Program planning and implementation should also be evaluated. Were affirmative action staff and managers effective in these areas?

- Setting realistic goals, timetables and hiring rates;
- Getting sufficient resources allocated to the program;
- Selecting and implementing useful strategies and activities; and
- Gaining and maintaining support for the program in the agency and community.