

Critical Personnel Issues
Affecting Black Employees

in the

Department of the Interior

Analysis and Recommendations

of

Town Hall Meeting
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Executive Summary

The Department of the Interior (DOI) is the only one out of 18 cabinet-level executive departments failing to meet set standards for Black employee labor-force representation.

In 2008, the Office of Personnel Management reported to Congress that the DOI was the only agency from 2002 to 2008 that did not meet its Relevant Civilian Labor Force (RCLF) representation.¹ Black employment in 2008 was 5.7% of the DOI's workforce, compared to a RCLF of 9.2%.²

Of all independent federal agencies, DOI experienced higher Black departures than it had new hires. This personnel crisis has steadily eroded, at best, well-intended improvements and the removal of barriers will be nothing short of striking at institutional racism.

For more than a decade, Black employment has been under-represented across the entire General Schedule and Wage Grade pay scales. This under-employment is very acute at the upper management levels, which has shown no noticeable improvement over time. Current programs and policies established to encourage progress simply have not worked and this paper will explain the more prevalent reasons why and the basis for Black employees perceiving a double standard in employment and career advancement.

Institutional under-representation is the central issue of several important ones concerning Black employees at the DOI. *Statistically, Black employees are recruited in fewer numbers, promoted at lower rates, and resign in higher numbers.* In response to these issues, the DOI Blacks In Government (BIG) recently sponsored a town hall forum for DOI employees to express concerns, share their perspectives, and recommend solutions. The responses provided at the town hall meeting were analyzed in light of quantitative and qualitative data that together form the basis for the recommendations.

Race Relations

Participants consistently referred to poor race relations and reported perceived discriminatory employment practices, few promotions, a lack of recruitment efforts, and low retention rates as the main issues of concern.

¹ Office of Personnel Management, "FY 2008 Annual Federal Equal Opportunity Recruitment Program Report," www.opm.gov/About_OPM/Reports/FEORP/2008/feorp2008.pdf; p. 10

² *Ibid.*

Black employees reported work situations and environments that could feel ostracizing and non-collegial, exclusive, and alienating. In its worst form, this results in a perception of the DOI as an institutional culture that is unsympathetic to diversity in the workplace. Statistical data show that the current Black employee representation is below the level it was at the DOI in 1985.

The current state of race relations reflects underlying problems in recruitment, promotions, and retention. Improvements in these areas would help temper tense relations when they occur. *A necessary step is to hold supervisors accountable through performance requirements which are tied to progress on institutionally mandated diversity goals.* This will counteract a deep-set perception of senior management as a “good old-boy network” that is antagonistic to Black advancement and ascension to leadership positions.

Criteria and standards for advancement appear lax when White candidates are the focus and rigid for Black candidates. Furthermore, the rules are perceived to change when Black candidates meet or exceed the rigid standards and are a ploy to eliminate Black candidates from fair competition and further consideration.

The oversight of the mission element to evaluate supervisors and managers according to their accomplishments of key diversity objectives--and contingent to their receiving rewards and recognition-- is an area in need of serious reform.

One unintended consequence of workplace race-based discrimination and poor race relations health disparities experienced by African-Americans. According to a UCLA study, the physical and mental distress from discrimination shows up in greater than average rates of diabetes and cardiovascular disorders and obesity. Statistically, African Americans have a shorter life span than other racial groups, except for Native Americans, and Black men fare even worse than Black women.

Employment Practices

Black employees feel they have limited legal protection against discrimination and receive little aid from the Departmental Office of Civil Rights³ and the Departmental Office of Human Capital. During the past eight years, the DOI devoted little attention to improving diversity and depleted the agency’s capacity to enforce civil-right laws.

As a result, claims of discrimination go unaddressed or underreported, further cementing the undercurrent of a perceived biased work place and the emergence of discussion about “institutional racism.” Restructuring bureau EEO offices to report

³ DOI’s EEO office is now the Office of Civil rights and that designation, when used in this document, will refer to that office and not the EEO’s offices in the bureaus of the Department.

directly to the agency and bureau heads would assure that legal redress is part of a positive, non-discrimination work environment and would go a long way toward establishing confidence in the Department's "Zero Tolerance" and other anti-discrimination policies.

Recruitment

The net decrease of Black employees and increasing underrepresentation are due mainly to recruitment rates that have not kept pace with the number of Black employees who depart each year. Solutions to this problem include establishing centralized outreach in bureaus' recruitment efforts and programs at Historically Black Colleges and Universities, reaching out to affinity and professional organizations, and increasing minority recruitment and hiring incentives.

Promotions

Statistically, Black employees at the DOI are promoted at lower rates than are their co-workers. Low morale and low retention rates can be traced to a lack of promotion opportunities and racially insensitive work environments. Big steps to help assure equal opportunities for all employees will take place when managers actively encourage diversity and apply standardized criteria for promotions.

Retention

Black employees are currently leaving the DOI in greater numbers than they are being hired. This trend can be traced in part to a perceived inhospitable work environment and blatant discrimination. In 2009, White employees received 77% of DOI awards, compared to Black employees who received 5%, while results fail to validate that managers met, nor were awards denied for failure to adhere to, the Department's diversity goals. Correlating awards with diversity accomplishments and re-instituting a mentorship program, in partnership with Blacks In Government, are actions that will help to rapidly increase retention rates and improve race relations throughout the Department and its bureaus.

Awards

While the dollar amounts of awards for employees continue to increase each year, a discrepancy exists between who receives the awards and for what. Managers and supervisors--who have clear performance requirements for affirmative action, equal employment opportunity and diversity goals and compliance with the Department's zero tolerance policy--failed to carry out many of these core mission-related functions, yet many were disproportionately given awards.

Introduction

This report results from the views and recommendations offered at a town-hall forum, hosted by the Department of the Interior (DOI), Blacks In Government (BIG) employees on August 25, 2009. Those present included employees of DOI bureaus and offices across the U.S.⁴ Discussions led to potential solutions to under-representation of Black employees in various areas at the DOI. Quantitative data were gathered, followed by the collection of qualitative material to ascertain, which perceptions and points of view stand the test of validation.

How Race Relations Are Perceived

A consensus among participants attending the town hall meeting--irrespective of state, bureau, or position--is that an institutional culture, often stemming from supervisors, appears unsympathetic to the concerns of Black employees. Situations may take an unduly harsh tone at work or pose obstacles for conducting business that advances DOI interests.

For instance, many participants reported that even attending the annual BIG national training conference was an unnecessarily difficult experience. The national BIG conference provides federally recognized training, with continuing professional education credits or units, in information technology, financial management, human resources and EEO, management leadership, communications, resource management and career development.

Despite BIG's useful and worthwhile continuing-education objectives, the majority of attendees reported going through an arduous process with unsympathetic supervisors who had to be persuaded to obtain their permission to attend the conference, even though the BIG conference has been sanctioned by OPM for several years. One speaker at the town hall described the impact on her morale:

"I have to prove and prove and prove what I do for the organization just to try and come to a one week session - that feels a little demeaning, almost like I'm not worth it. And I have to prove it every year that I am worth it to come."

⁴ This report is arranged into the five areas that employees at the town hall meeting identified of greatest concern: race relations, employment practices, recruitment, promotion, and retention. Note: To assure anonymity, individuals' names, bureaus, and other identifying characteristics of respondents have been redacted from quotations.

Nearly every speaker echoed a similar sentiment as the one above. One participant's description of her repeated attempts to attend the conference serves as an indicator of the push back attendees received:

"Every year I have to fight just to get to this particular conference. In other conferences you can have 10-12 people attend and there's no problem. But with this one I'm the only one who comes..."

Another individual, who has attended the BIG conference for the past ten years, discussed her disappointment and growing impatience with the lack of reform:

"...the Department of Interior has continually reported statistics at DOI dealing with African Americans in hiring, promotion, cash rewards, etc., but they have not changed in the last 10 years. So my question is when will we really see a change?"

The difficulty employees face in attending the conference appears indicative of a larger problem that stems from the institutional lack of focus on diversity. This lack of attention was demonstrated in 2009, after OPM announced support of the national BIG conference more than two months before the event, and DOI issued its announcement only two weeks before the event, with insufficient time for many likely attendees to get their supervisors' authorization. One participant, a manager, expressed frustration with the inattentiveness some leaders give to diversity initiatives like this:

"There used to be a day when we had project leader meetings and we used to talk about diversity and the importance of it...Now they don't even bring it up unless we bring it up. No effort."

Conclusion

Black employees feel alienated from their peers and unsupported by supervisors on issues of diversity. Their feelings stem from larger problems in employment practices, recruitment, the promotion process, retention and a backlash to efforts to create diversity programs, which encourage action.

Employment Practices and Redress

Black employees feel the system, meant to protect them against discrimination, is ineffective as it is currently structured within the Department. Black employees perceive the Departmental OCR complaint system, by reporting to the Chief Human Capital office rather than to the head of the agency, to be ineffective because it

diminishes the role and authority of the official who has been delegated the responsibility for implementing the Department's anti-discrimination system.

Beginning in 2003, the Departmental OCR was proposed to undergo several structural changes. The restructuring of the EEO office's reporting hierarchy was the most significant change. Rather than OCR reporting directly to the Secretary as head of the agency, as Title 29 of the Code of Federal Regulations requires, it was placed under the supervision of the Human Capital office, five levels below the Secretary, an arrangement that has adversely affected Black employees.⁵

*In 2004, one year after the changes took place, the number of race-related complaints more than tripled, with 87 complaints filed compared to 26 in 2003.*⁶ Meanwhile, processing time of complaints has dramatically increased in the intervening years.

EEOC reported to Congress that DOI's average processing time for all complaints increased from 485 days in 2007 to 529 days in 2008, while the government-wide average was 336 days.⁷ Unnecessary and time-consuming processes hinder the prompt investigation of complaints and result in additional unproductive costs to the government with undue delay and inefficiency.

These trends have contributed to sentiments among Black employees that the redress system is ineffective. Consequently, the shortcomings of the Department's EEO system exacerbate existing inequalities, lead to other discrimination cases going unreported, and deters attention to employment-related problems.

One attendee succinctly described the current situation for Black employees in the Department:

"Part of the systemic problem is that there are no rights for employees....there's not much union activity, so the only redress that employees have is the EEO complaint system. But that system has been so corrupted that employees don't have their rights and a lot of employees leave because they know they don't have their rights."

One contributor expressed her frustration regarding the present structure of the Human Capital office:

⁵ Federal Sector Equal Employment Opportunity: Title 29 CFR Part 1614.

⁶ Equal Employment Opportunity Data Posted Pursuant to the No Fear Act 4th Quarter 2008 Report.

⁷ EEOC report, Sept 2009.

“When are they going to get rid of this human capital program...? All they did with that was put HR people in to block the access of the EEO people to the top leaders....they should not be supervising EEO people and the EEO program.”

Rather than turning to official channels to report discrimination, Black employees are increasingly turning to organizations, such as BIG, to voice their concerns and seek redress. One member of BIG revealed that the organization spends a great deal of its time assisting members with discrimination complaints, conflict management, career counseling, and other advisory services:

“Many of our members are inundated, overwhelmingly, with trying to help the employees because they do not feel comfortable at all working with people that are incompetent in that leadership role. It’s just not the HR office, the EEO office, we also need to examine the leadership role of HR.”

BIG even experienced White employees increasingly seeking its services due to inadequate working relationships and communication with the offices of Human Resources and Civil Rights. Some expressed consternation that their written communications about workplace disputes had been ignored.

Conclusion

The reporting arrangement between the Department’s OCR and Human Capital Office (which oversees the agency’s Human Resources office) is perceived as more of a deterrent than a facilitator to solving workplace problems. This results from OCR’s lack of independence, the absence of qualified leadership, and the interference by managers with its neutrality in its decisions.

The current policy prepared by the OCR office for Secretary Salazar is an example of its ineptness.⁸ While the policy espouses non-discrimination and zero tolerance, it encourages employees to raise these matters with their immediate supervisors, who most often are the culprits of the alleged discrimination. The policy, inconsistent with EEOC regulations and case law, puts a chilling effect on employees’ right to pursue claims. This system limits the capacity to investigate reported acts of discrimination and doing so in a timely manner. Without unimpeded EEO oversight and enforcement, employees feel vulnerable to discrimination under the current organizational structure. The two offices – OCR and Human Capital – have failed miserably to meet their highest

⁸ Prepared by the EEO office for Secretary Salazar, the Policy on Equal Opportunity and Zero Tolerance of Discrimination and Harassment was signed by the Secretary, September 4, 2009.

priorities. If allowed to go unaddressed, the current redress structure will undermine solutions to problems in recruitment, promotions, and retention, suggesting a culture that is unsympathetic to workplace diversity.

The current and immediate past Human Resources Directors have contributed to a culture of discrimination by continually turning a blind eye to obvious department disregard of current law and sound practices. To show good faith expression and seriousness of purpose by Human Resources and EEO leadership must start by developing methodologies to address disputes early and explore ways to build credibility with employees.

The Need for Increased Minority Recruitment

Recruitment is the key to making the Department competitive in relation to other federal agencies with respect to labor force participation. It is also the way to counteract the negative effects that the expected departures by retirees will have. At present, the DOI will have to recruit more than two thousand additional Black employees to meet the 2008 RCLF of 9.2% to have an equitable representation of Black personnel.⁹ However, current recruitment efforts fall woefully short of this goal.

Only 274 Black employees were hired in 2008.¹⁰ At the same time, 3,441 new White employees were hired.¹¹ In that year, 45% of new hires were White males compared to only 2.1% Black males;¹² 29.9% of new hires were White women, compared to only 3.5% Black women.¹³ These statistics show how the status quo for non-minority employment in DIO is maintained, and how it is a detriment to increased Black employment representation.

Analysis shows that current recruitment efforts are not even sufficient to balance the number of Black employees who left the agency the previous year. *In 2008, 274 Black employees were hired while 335 left the agency.*¹⁴ *Simply put, Black employees leave at a higher rate than the rate at which they are hired.* This fact suggests that unless measures are taken to reverse the trend, the DOI will have an even less diverse workforce in future years as large numbers of Black employees begin to retire because new hires to replace the depleting ranks are not sufficient. In short, to have equitable Black employee representation, the DOI must dramatically increase its recruiting efforts in this under-represented group.

⁹ BIG Statistical Report, 2008.

¹⁰ DOI EEO Office, "FY 2008 Year End Charts."

¹¹ 2008 BIG Statistical Report.

¹² DOI, EEO Office, "FY 2008 Year End Charts."

¹³ *Ibid.*

¹⁴ DOI, EEO office, "FY 2008 Year End Charts."

Participants in the town hall meeting were fully aware that formal recruitment plans were lacking and initiatives were left to the discretion of individual managers. Unfortunately, the results of that approach show there is little motivation or strategy on the part of supervisors to recruit target groups.

One manager described the office culture regarding diversity recruitment his way:

“...there’s not a lot of effort being made to bring more [minorities] in, except through us...*they’re making no effort to encourage my white brethren, managers, to recruit and do the right thing.* It’s not happening, and I don’t see it happening unless Secretary Salazar makes an effort and sends a message that there will be accountability and that diversity is important...”

Another employee echoed this sentiment and pointed to the need for institutional initiatives and measures causing accountability to ensure that managers were consciously building a more diverse work place:

“...*managers, will be proactive when they know there’s accountability.* Right now they figure they don’t have to. You know, they are in their comfort zone. They don’t have to do a doggone thing because the message is not being conveyed that it’s important and they need to make an effort.”

The discontinuation of specific outreach programs further hampered Black recruitment efforts. One contributor said that new employees and interns assigned to her office became overwhelmingly White when recruitment at Historically Black Colleges and Universities (HBCUs) was terminated. She brought attention to the fact that strictly relying on local colleges to provide diverse candidates can prove insufficient because of local, regional and state demographics:

“I came to [the bureau] through recruiting at the HBCUs. That has stopped. We are now recruiting from [the local college]. Most people when you say [state deleted] say, “There are Black people in [that state]?” Yea, there are Black people in [the state], but that symbolizes the fact that from the [local college] it is generally Caucasian students that are brought on. *All of the interns that I have seen brought on in the last couple of years are Caucasian. I have not seen a single African-American or minority come through.* I would like [the bureau] to go back to recruiting at HBCUs.”

Conclusion

To attain equitable Black employee representation, the DOI must dramatically increase its recruiting efforts with high-level leadership strategies. An effective mission critical

recruitment strategy must be tied to management “ownership” of the personnel issues to be solved and acknowledge abandonment of prior deficient and ineffective methods.

Leaving diversity recruitment to the discretion of individual managers has resulted in failures. The historical data show this. What is needed is a diversity-recruitment strategy, with aggressive outreach, applying proven methods that help identify new hires to replace the increasingly underrepresented Black personnel, especially in light of expected increases among retirees. The facts call for an EEO and Human Resources recruitment strategy, embraced by a new leadership, with a commitment to engage a plan with specific objectives, and pursued until progress is achieved.

Limited Promotional Opportunities

Black employees are promoted at lower rates to senior levels than their non-Black co-workers. Overall, while Black employees make up 5.7% of the total workforce, they only comprise 3.0% of First-Level Officials/Managers, 3.3% of Mid-Level Officials/Managers, and 4.4% of Senior-Level Officials/Managers.¹⁵

Only seven Black employees were promoted to the SES grade level from 2000 to 2008, compared to 99 White employees promoted in 2008 alone. *During the 2000 to 2008 period, Black males at the GS-15 grade level actually decreased by 5, dropping from 32 to 27.¹⁶*

When a Black candidate makes the best-qualified certification list for an advertised vacancy, delays often occur in filling the position. Furthermore, a Black candidate who may be the best qualified and outstanding in the interview process, may still fail to get selected. Various reasons have arisen over the years and the reasons are known by rote about why a Black candidate is not chosen: The candidate needs more field experience or senior management decided to fill the position with someone else are the well-known preemptive explanations.

Attendees of the town hall meeting felt the promotion process is rife with non-Black racial preference. One speaker described racial bias in this shocking experience after getting turned down for a promotion:

*“...they sent a high-level manager to talk to me and **basically what she said was that because I was different I had to work a little harder and be a bit more humble and said that if I was a white male there would be no problem about***

¹⁵ U.S. Department of the Interior, Equal Employment Opportunity Commission Annual Report on the Federal Work Force for FY 2008.

¹⁶ U.S. Department of Interior Equal Employment Opportunity Commission Annual Report on the Federal Work Force for FY 2008.

being aggressive and outgoing, but because I was different I had to behave differently..."

Another attendee, who had spent 15 years at the GS-7 level, explained how practices can seem to mock the well-intended policy. "'Highly qualified personnel.' Now I have heard that statement so many times. It's a good statement to have because you need qualified people.

"However, 'the norm is that when African Americans put in for a job they have to be overly qualified over the other people. I worked for a manager for 10 years that had maybe high school and one year of community college where I had four years of college and they still made me go back to school to learn everything that they said I needed to learn. The 'highly qualified' thing is not the norm for all other people groups..."

One participant highlighted how the current state of race relations aggravated existing problems when it came to promotions at the highest DOI levels:

"We need to examine, 'how do we increase these ranks in the SES?' ...the few SESers that we do have fear promoting their own. They absolutely have fear. What can be done to take that fear out of them?"

One speaker drew attention to the core sentiment regarding promotions and standards when he said, *"there needs to be an equalization of the rules because there is definitely a double standard here."*

Conclusion

Perceived unfairness, based on racial differentiation, hardens when it is linked to the promotion system. The underlying tone in respondents' words at the town hall session is that of diminished morale when comparable education, experience, and skill go unrecognized in promotions. The large number of Black departures from DOI is directly related to frustration with the lack of promotion.

A more equitable promotion process that eliminates racial bias would improve race relations and will increase the retention rate of Black employees. An increase in Black employees holding senior level positions will help set the proper and prudent tone about merit and representation.

The chief common denominator, expressed among town hall meeting respondents, was the hope that uniform standards would form the basis for granting promotions, one that is consistent with accountability for meeting clearly established diversity goals. The absence of leadership to champion normalcy was frequently mentioned, as were the

need for clear standards in position descriptions and publishing them for all employees to become informed.

Low Retention Rates

The number of Black employees has steadily decreased over the past seven years. Starting in 2001, the number of Black employees has decreased each year. Between 2007 and 2008 alone, Black personnel decreased by 96.¹⁷ More startling, however, is that in 2008 alone, 335 Black employees left the agency, constituting 7.7% of all departures that year.¹⁸ The number is staggering inasmuch as Black employees make up only 5.7% of the total DOI workforce.¹⁹

Decline in retention is glaringly obvious among Black employees. One individual, who first joined his bureau in 1988, noted a marked demographic shift in his office: *“I have seen that department go from 13 African-Americans down to one – me.”*

Low retention rates are largely attributed to a discouraging state of race relations. One speaker, who knew several Black SES employees, described candid conversations with them concerning their resignations:

*“Not long ago two [SES grade Black employees] departed. One did a letter of resignation over the weekend that was posted in the Atlanta newspaper. She could have been 50, maybe not, but just couldn’t take it anymore. Another SESer with the [bureau deleted] left before the age of 50. **She couldn’t take it anymore. She couldn’t cry anymore.**”*

Performance awards are an area of discouragement, when personnel are rewarded without regard for diversity goals and other standards. These awards actually aggravate the perception that the Department is disinclined to recruit and retain Black employees. In 2009, White employees received \$51.6 million, or 77% of the awards, compared to \$3.6 million, or 5%, received by Black employees.

Yet, it is hard to account for how the award system functions in any other way than as a discouragement to diversity. By the Department’s own policy, managers and supervisors have performance plans that require them to meet affirmative action, equal employment opportunity and diversity goals, compliance with merit system principles, improve diversity, prevent and remedy discrimination and harassment in compliance

¹⁷ DOI, Office of Civil Rights

¹⁸ DOI, FY 2008 Year End Report. Resignations do not include adverse actions and reduction-in-force

¹⁹ Office of Personnel Management, “FY 2007 Annual Federal Equal Opportunity Recruitment Program Report”

with the zero tolerance policy. The duplicity of the system diminishes morale and gives the appearance and is evidence of a personnel double standard, when bonuses go to those who undermine workplace diversity and efforts to increase Black employment.

Understandably, the federal community, cognizant that the Department has some underlying problems to go with its large policy portfolio and public visibility, ranks the DOI 22nd out of 30 large agencies among those listed in the “Best Places to Work in the Federal Government.”²⁰ DOI’s standing alone, in this respect, can hamper some from seeking opportunities within the Department, its agencies and bureaus.

Nonetheless, efforts to increase retention rates will remain especially crucial in the next several years, as larger numbers of the Black work force reach or near retirement eligibility. *As of September 2009, roughly 16% of Black employees were eligible to retire. Over the next five years, the number of Black employees who become eligible for retirement will increase from 514 to 614. The situation will test retention programs that, unless they are effective, will do little to curb the depletion of the Department’s Black work force.*²¹

This situation underscores the increasingly important role recruitment will have to play. The loss of experienced employees adds pressure to increase new Black hires, retain members who are already employed by the Department, and perfect methods that minimize the loss of valuable institutional knowledge that departs with those who leave the agency.

Conclusion

Problems with retention can be traced to the perception of a hostile work environment. Among the contributing reasons why Black employees leave the DOI is a strong association with feelings that their contributions are under-valued. Black employees leave because the DOI does not appear to value their contributions. Retirement is an exit strategy for some when workplace diversity is seen as weakening and their contributions under-rewarded.

The perceptions of a hostile work environment stem from a reinforcing circle of factors that include getting passed over for promotions, the disproportionate awarding of promotions to non-Blacks, limited legal protection, and a continued and systematic under-representation of Black employees. This circle of factors, left unaddressed, reinforce the notion that the DOI fosters a biased work environment, to which Black

²⁰ Partnership for Public Service and American University Institute for the Study of Public Policy Implementation, School of Public Affairs, 2009.

²¹ EEO Office data.

employees respond rationally by continuing to resign and leave the Department with feelings they are under pressure to do so.

An effective feedback loop needs to track and monitor offices and managers through the exit interview rather than to be used as nothing more than a way to say good-bye. Even then, Department-wide exit interviews are not conducted.

With an aging work force, the DOI faces depletion of Black personnel, which leaves no alternative but engage in aggressive recruitment, along with retention, in crucial professional areas to ensure that the negative personnel trends are reversed and Black employees are proportionately represented. Improvements in the aforementioned areas would help improve retention rates and preserve institutional knowledge that Blacks bring to the Department.

Accountability

A lack of accountability is the biggest barrier to making progress in diversity and equal opportunities at DOI. The Department has retained a culture of neglect of procedures that obfuscate discrimination, mind-numbing resistance to change with a resistance to solving old issues. Improvements will remain minimal until DOI, at the highest level, understands that bad practices are sanctioned by persons who determine the outcome. The new Administration has an opportunity to reverse this sad state of affairs.

Unfortunately, the Department's offices of Civil Rights and Human Resources lack the necessary leadership and credibility to bring an end to issues of racism, sexism, and unfair employment practices within DOI. The right leadership is needed if the intention is to successfully repair the present dysfunction.

These Departmental Offices failed to implement an effective civil rights strategy, to provide strong leadership to their mission, to provide necessary civil rights guidance, and to design oversight procedures as protection for all employees. Department-wide responses and solutions have been insufficient. And a mockery has been made of civil rights by officials responsible to safeguard the public interest. Inadequate expertise and knowledge is tolerated in these areas that have become a new obstacle to resolving what should be routine matters.

Recommendations

Interviews and data analysis suggest six policy areas to address. These recommendations are intended to resolve or minimize disturbing issues in race relations, employment practices, recruitment, promotions, and retention affecting Black employment.

1 - Management Accountability

Agency heads and the Assistant Secretaries, under the Secretary's leadership, must hold supervisors accountable for reaching diversity goals related to hiring, promotions, recognition, and retention. Performance in achieving these goals must be tracked, monitored, and tied to an evaluation and award system that is directly linked to compensation. The review of progress by agency heads is the kind of direct leadership and performance demanded of this Department. New standards, measures, and performance requirements for SESers should be set that link rewards to diversity goals, and performance should not be rewarded for failing to achieve these goals.

2 - Submit Monthly Statistical Progress Reports

Monthly statistical reports from bureau Directors and other major office heads should go to a senior-level official, appointed by the Secretary, in charge of overseeing diversity progress. Regular monitoring through monthly reports will help provide in-progress accountability for specific performance measures. These data will be crucial for identifying areas that need attention, where assistance and intervention is timely, and will assist in planning future actions.

3 - Restructure the Human Capital/Human Resources and Equal Employment Opportunity Offices

The Departmental OCR should be removed from reporting to the Human Capital office, and this should likewise be the case in the bureaus to the extent this same or substantially similar arrangement exists. The OCR and EEO offices' legal responsibilities are distinctly separate from other administration matters and should report directly to the heads of the agencies. This reporting alignment sends a strong message to all Department and bureau employees about the importance of diversity and non-discrimination. In support of the Department's diversity goals, a strong collaboration should be structured between the Human Resources office and the OCR and bureau EEO offices to facilitate management's accomplishment of diversity efforts.

4 - Bonuses should be paid, but only when diversity goals are reached

Seventeen (17) other cabinet-level federal agencies have been able to make normal progress and maintain their diversity standards. There is no acceptable reason why DOI should be the exception. Thus, paying bonuses at DOI should cease, unless and until Relevant Civilian Labor Force (RCLF) standards are met or significant progress in improving diversity is made.

5 - Increase Recruitment from Historically Black Colleges and Universities and Restart the Office of Educational Partnerships

The function of the Office of Educational Partnerships, after it was abolished in May, 2004, was not assigned to another office. Its loss contributed to limited recruitment at HBCUs. Restarting this office will provide a flagship leadership group to spur on recruitment and outreach to HBCUs, Hispanic-serving institutions, tribal colleges and universities and other groups that can significantly help increase diversity.

Hold Bureau Directors accountable for transitioning youth and young careerists into employment programs. Expand youth programs and initiatives to more fully engage many segments of society, with the inclusion not only of race and national origin, but also of gender and individuals with a disability.

6 - Establish a Mentoring Program for Minorities

Creating a mentorship program that requires managers to participate will help create a more positive work environment for Black employees now in service and those who are entering the agency. Mentorship helps increase retention rates and, moreover, contributes to preserving institutional knowledge by passing an invigorated DOI culture to younger employees.