

POLICY ISSUE INFORMATION

November 23, 2004

SECY-04-0219

FOR: The Commissioners

FROM: Luis A. Reyes
Executive Director for Operations

SUBJECT: EQUAL EMPLOYMENT OPPORTUNITY (EEO) BRIEFING

PURPOSE:

To inform the Commission of the status of the Equal Employment Opportunity (EEO) Program at the NRC.

BACKGROUND:

The Energy Reorganization Act of 1974, as amended, requires the NRC Executive Director for Operations (EDO) to report to the Commission, at semi-annual public meetings, on the problems, progress, and status of the agency's Equal Employment Opportunity (EEO) Program. For the next briefing, scheduled for December 7, 2004, the staff will discuss progress and significant activities related to the agency's EEO and diversity management (DM) program including, (1) enhanced management accountability and training, (2) the Comprehensive Diversity Management Plan (CDMP), (3) EEO complaint activity, including activity in alternative dispute resolution (ADR), (4) recruitment strategies and results achieved to enhance workforce diversity, (5) career development, and (6) performance measures for the agency's EEO program. Additionally, the discussion will include a summary of the agency's small business activity related to the Federal procurement preference requirements. Assessments of the program will be based on activities/data through September 30, 2004.

This paper responds to the Staff Requirements Memorandum (SRM) dated June 10, 2004 (M040602A). Items in the SRM are discussed in relevant sections of this paper. Attachment 1 provides a summary of the SRM items and where the response is discussed.

This paper includes a statement from the Office of Research on its EEO and diversity management achievements and challenges (Attachment 2); a joint statement from the

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five EEO Advisory Committees (African American Advisory Committee, Hispanic Employment Program Advisory Committee, Federally Employed Women Advisory Committee, Asian Pacific American Advisory Committee, and the Committee on Age Discrimination (Attachment 3), and EEO complaint data and workforce profile data by grade, ethnicity, gender, occupation, and age for FY 2000 - FY 2004 (Attachment 4).

DISCUSSION:

Enhanced Management Accountability

Management accountability is key to fostering a positive, discrimination-free work environment where the contributions of all employees are recognized and each employee has an equal chance to succeed. It is NRC's goal to build a high-performing, diverse workforce and a workplace based on mutual acceptance and trust with the ultimate objective to increase organizational capacity. Managers play a key role in formulating and implementing EEO and diversity management strategies that move the agency toward its objective. They need to have available and use guidance and tools that lead to success in these efforts. The Commission expects managers to raise their awareness of EEO and diversity management techniques through training. The Notification and Federal Employees Anti-discrimination and Retaliation Act (No FEAR Act) also requires that managers and supervisors be trained on their responsibilities in EEO. NRC planning systems also enhance management accountability for diversity management. The following sections describe training and planning systems that enhance management accountability.

EEO and Diversity Training for Managers and Supervisors - During FY 2004 and to date in FY 2005, over 300 managers, supervisors, and team leaders have taken the *EEO and Diversity for Managers and Supervisors* course. The course is designed to enhance management awareness of diversity management and provide updated information on the impact of new EEO laws and regulations, including reasonable accommodation. During the November 2003 EEO Commission Briefing, 287 managers were identified as needing the required EEO and diversity management training. NRC set a goal to have these managers complete the training by the end of calendar year 2004. Nine sessions of the course have been held and two additional sessions are scheduled for December 2004. As of November 19, 2004, only 4 of the 287 managers remain and are scheduled to complete the training by the end of this calendar year.

This training provides managers tools needed to successfully carry out their EEO and diversity management responsibilities. Feedback from managers on this course has been positive and constructive. SBCR has used the feedback to improve the training by modifying some course materials. SBCR will continue to enhance this training in response to the needs of NRC managers, their feedback, and as our organizational environment requires.

Key Planning Systems - Several key planning systems address enhanced management awareness and accountability in achieving the agency's EEO and diversity management objectives.

SES Performance Management System - Prior to FY 2004, diversity management was commingled with other core competencies under the Management Effectiveness critical element. The system was revised for FY 2004 to better align performance plans with the agency's Strategic, Performance, and Operating Plans; focus greater attention on leadership attributes; and establish a framework for making meaningful distinctions in performance. This new system includes two critical elements: (1) key programmatic objectives which focus on mission-related performance and (2) key leadership attributes which focus on how executives carried out their leadership responsibilities. The latter element places specific emphasis on diversity management objectives. In FY 2004, "Builds Diversity" was established as a separate Key Leadership Attribute placing specific emphasis on diversity management objectives. In the FY 2005 system, the Key Leadership Attributes critical element was aligned with the Office of Personnel Management's government-wide Executive Core Qualifications (ECQs). Establishment of diversity management initiatives and resulting accomplishments will be assessed under the more general ECQ: Leading People. This arrangement integrates diversity management within the mainstream of human resource management activities with which it is intricately related, and is an effective way of achieving results.

Comprehensive Diversity Management Plan

EEO and diversity management goals and measures, proposed by an SBCR-led Task Force, have been approved and incorporated in the agency's new Comprehensive Diversity Management Plan (CDMP). The CDMP was approved by the Commission on October 4, 2004, and is expected to be issued in November 2004. The goals of the CDMP are: (1) recruit diverse employees at all levels, (2) develop and retain diverse employees by promoting an environment that values differences, and (3) increase the diversity of employees in senior and managerial positions. The CDMP sets the framework to guide EEO and diversity management initiatives and ensures a common focus to recognize, appreciate, and respect the contributions of all employees. The CDMP is a structured approach to ensure continued progress in reaching the agency's diversity management goals, promoting a discrimination-free work environment, and providing opportunities for all employees to use their diverse talents to support the agency's mission.

Steps have been taken to implement a structured plan to communicate the CDMP to the staff. The rollout process began with a briefing to senior managers at the October 2004 Senior Management Meeting and at an Executive Resources Board meeting in November 2004. The rollout process will also include a video-taped message from the EDO, hard copy distribution of the CDMP to every employee, an announcement on NRC's internal website, and an article in the NR&C publication by the end of the calendar year. The CDMP is dynamic, and strategies will be reevaluated periodically to ensure the appropriate focus.

Operating Plans - The goals of the CDMP will be integrated into standard operating plans. Offices will include specific EEO and diversity management strategies in their operating plans, tailored to their individual circumstances and challenges. These strategies include the use of innovative recruitment initiatives, leadership development, mentoring, coaching, staff development, effective communication, recognition, valuing differences, accessibility, and new and revised procedures and processes that support EEO and diversity management. The results of these initiatives will inform the performance appraisal process.

The release of the Commission-approved CDMP; the EDO's requirement that offices include EEO and diversity management strategies in their operating plans; and the integration of diversity management into NRC's Strategic Plan and the SES Performance Management System all provide assurance that diversity management will receive appropriate and consistent focus in the NRC.

EEO Complaint Activity

Since the last EEO Commission Briefing, information on EEO complaint activity for FYs 1999 - 2004 has been posted on NRC's public website as required by the No FEAR Act. The Alternative Dispute Resolution (ADR) process continues to be offered to employees as an option for resolving informal and formal allegations of discrimination. The data below depicts informal and formal complaint activity for FY 2003 and FY 2004.

FY 2003 Informal Complaint Activity:

30 Initiated
24 Closed (4 settled; 9 withdrew;
11 Notice of Right to File)
4 ADR (3 settled, 1 unsuccessful)

Formal Complaint Activity:

9 Filed
16 Closed (6 settled, 9 Final Agency
Decisions, 1 withdrew)
4 ADR (1 settled, 3 unsuccessful)

FY 2004 Informal Complaint Activity

28 Initiated
27 Closed (4 settled, 8 withdrew, 15 Notice
of Right to File)
6 ADR (3 settled, 3 unsuccessful)

Formal Complaint Activity:

12 Filed
15 Closed (7 settled, 1 Final Agency
Decision, 4 withdrew, 3 Final
Orders)
0 ADR

Our rate of success in bringing EEO complaints to closure continues, resulting in 22 closures by mid-year to a cumulative total of 42 closures by the end of FY 2004. Cooperative efforts of complainants, managers, EEO counselors, mediators, SBCR staff, and members of the Offices of General Counsel and Human Resources continue to enhance our ability to resolve allegations of discrimination.

Workforce Diversity and Recruitment Strategies

Agency Demographic Profile - The agency's FY 2004 demographic profile has remained relatively the same as FY 2003 for each employee group except African Americans and Native Americans who decreased slightly from 14% to 13%, and .36% to .35%, respectively. Asians remain at 7%, Hispanics at 5%, Caucasian women at 24%, and Caucasian men at 50%. Conversely, the percent representation for African Americans and Native Americans in managerial and supervisory positions increased slightly from 7.2% to 7.7%, and .3% to .5%, respectively. Caucasian women in managerial and supervisory positions increased significantly from 15% (52) to 17% (62). This increase for Caucasian women includes 4 SES selections, one of whom was an external hire. During FY 2004, the total number of Caucasian women in SES positions increased from 19 (13%) to 23 (15%). Although the number of Caucasian men in SES

positions increased from 111 to 115, their representation decreased from 76% to 74%. Continued use of the Leadership Potential Program and the SES Candidate Development Program will increase the potential for enhanced diversity for developmental and advancement opportunities for senior level positions. Recent results of these developmental programs will be discussed later in this paper.

The table below shows a demographic breakout on managerial and supervisory positions.

**Managers and Supervisors
Agency FY 2003 & FY 2004
(Includes SES & non-SES)**

	FY 2003 As of 9/30/03		FY 2004 As of 9/30/04	
Total	345	100%	375	100%
African American	25	7.25%	29	7.73%
Asian Pacific American	19	5.51%	20	5.33%
Hispanic	10	2.90%	10	2.67%
Native American	1	0.29%	2	0.53%
Caucasian Female	52	15%	62	17%
Caucasian Male	238	69%	252	67%

Comparison of demographic profiles with other Federal Agencies - NRC's SES and supervisory demographics were compared with those of five Federal agencies that employ substantial numbers of engineers and/or scientists: Department of Energy (DOE), Environmental Protection Agency (EPA), National Institute of Standards and Technology (NIST), National Science Foundation (NSF), and National Aeronautic and Space Administration (NASA). The results were transmitted to the Commission by memorandum from the EDO on November 2, 2004, and reflect the following:

NRC has the lowest representation of women in the SES and among supervisors generally. All six agencies have low representation of women in technical supervisory positions. NRC has 14% and the average representation is 15%.

The representation of minorities in the SES is low in all six agencies, ranging from 9.8% (DOE) to 16.4% (NASA). At 11.2%, NRC minority representation in SES is below the 13.4% average for all six agencies. NRC's minority representation among technical supervisors is 14%, which is the average for the six agencies. For all supervisors, NRC's 15.9% minority representation rate is close to the agencies' average of 16.7%.

Diversity in Agency Hires

Overall, a total of 250 hires were made in FY 2004: 132 Caucasian men, 60 Caucasian women, 31 African Americans, 19 Asians, 7 Hispanics, and 1 Native American.

Entry-Level Hires - The agency succeeded in identifying, attracting and hiring diverse candidates for entry-level positions in FY 2004. HR continues to identify new recruitment resources that help to provide the quality and diversity necessary to fulfill the agency's current and future employment needs. The number of entry-level and Nuclear Safety Professional Development Program (NSPDP) hired during FY 2004 and early FY 2005 is 50, of which 19 are Caucasian men, 16 Caucasian women, 3 African American women, 4 African American men, 2 Asian Pacific women, 3 Asian Pacific men, 1 Hispanic woman, and 2 Hispanic men. During FY 2004, a total of 65 employees graduated from the NSPDP. Currently, 88 employees (42% minorities, 18% Caucasian women, and 40% Caucasian men) are participating in the NSPDP.

Mid-Level Hires - Enhancing the representation of the mid-level feeder pool (GG-13 through 15) continues to be an important strategy to enhance diversity in managerial and supervisory positions. This pool of employees will provide the major source of highly qualified applicants for managerial and supervisory positions. During FY 2004, a total of 157 mid-level hires were made: 12 African Americans, 13 Asians, 2 Hispanics, 1 Native American, 27 Caucasian women, and 102 Caucasian men. Mid-level hiring reflects the most significant of our hiring accomplishments. We will continue efforts to recruit a diverse group of employees at this level to enhance diversity in the feeder pool leading to supervisory and management positions.

Impact of Grade GG-13 through 15 Recruitment on GG-13 through 15

Advancement - An issue was raised regarding the impact of external selections on the advancement of employees to the mid-level (GG-13 through 15). At the GG-13 grade level, the effect is minimal. The full performance level to which professional engineering and scientific staff can advance without further competition is GG-13. Because the number of selections for positions at grades GG-14 and GG-15 has doubled to more than 200 in each fiscal year since FY 2002, the staff has had significantly more advancement opportunities than in the past, notwithstanding some 50 external hires at the GG-14 and GG-15 levels. It should also be noted that a number of these external selections were for skills for which the agency did not possess an adequate internal candidate pool.

The table below shows a demographic breakout on hires by level.

**Agency FY 2004
Hiring Activity by Level**

	Entry Level	Intermediate Level	Mid Level	SES	Senior Level	Other	Total
Total	35 100%	11 100%	157 100%	1 100%	4 0%	39 100%	250 100%
African American	6 17%	0 0%	12 8%	0 0%	0 0%	13 33%	31 13%
Asian Pacific American	4 11%	1 9%	13 8%	0 0%	0 0%	1 3%	19 8%
Hispanic	2 6%	2 18%	2 1%	0 0%	0 0%	1 3%	7 3%
Native American	0 0%	0 0%	1 1%	0 0%	0 0%	0 0%	1 0%
Caucasian Female	10 29%	2 18%	27 17%	1 100%	0 0%	19 49%	60 24%
Caucasian Male	13 37%	6 55%	102 65%	0 0%	4 0%	6 13%	132 53%

Recruitment Strategies

Throughout the Federal government and within the NRC, it is projected that a sizable portion of the workforce will retire within the next 3 to 5 years. The impact of this loss will be mitigated by recruitment, employee development, and retention strategies. The information below provides a discussion on NRC's recruitment strategies.

Events Targeting Women and Minorities - In an effort to manage the projected loss of valuable talent and skills, NRC continues to use existing and new recruitment sources to attract highly qualified, diverse applicants. NRC managers and technical staff plan to participate in information sessions with professors and department chairs at selected institutions to provide information regarding the NRC and employment opportunities. Institutions currently scheduled for FY 2005 are: Johns Hopkins University (Baltimore), University of Maryland Baltimore County, City College - New York University, Florida State/Florida A&M College of Engineering, and Tuskegee University/Cincinnati University Bridge Program. Also, the agency sponsored resume and interview workshops at Howard University and Bowie State University. Each of these institutions has engineering or nuclear engineering programs and significant enrollments of women and minority students.

The FY 2004 recruitment schedule was expanded to include additional events targeting minorities and women. All events include a high percentage of women and minority applicants. Specific events targeted the following groups:

Hispanics: The City College of New York - New York University: 33% Hispanics overall. The undergraduate level School of Engineering has 20% women, 30 % Hispanics, and 30 % African Americans. Texas A&M University - Kingsville: a Hispanic Serving Institution with 60% of its 6000 student enrollment being Hispanic. This is one of the country's largest producers of Hispanic engineering graduates. Additional events included visits to the University of Puerto Rico and participation in 8 career conferences.

Women: Participated in three career fairs sponsored by the Society of Women Engineers.

African Americans: The following schools and events were added to the FY 2004 recruitment schedule: Hampton University, the National Technical Conference, the Congressional Black Caucus Foundation Diversity Career Fair, and the NAACP Diversity Career Fair.

Native Americans: Participated in a career fair sponsored by the Society for the Advancement of Chicanos and Native Americans in Science. NRC is currently assessing strategies to attract Native Americans.

Student Programs to Attract Entry-Level Diverse Applicants - The following programs continue to provide a good source of highly-qualified, diverse candidates.

Student Career Experience Program or Cooperative Program (Co-Op) - is one of the key strategies for NRC entry-level hiring. During FY 2004, 16 students participated in the NRC's Co-Op Program: 2 African Americans, 3 Asian, 2 Caucasian women, and 9 Caucasian men. Of the graduating college seniors participating in the Program, 3 accepted full-time employment with the agency. This program incorporates all of the elements necessary for preparing students for future entry-level NRC employment. The experience gained while working as a Co-Op provides a formal mechanism for highly-qualified, diverse students to learn while they earn, adapt to the work environment, receive state-of-the-art training, and broaden their exposure to the staff. Upon successful completion of a Co-Op program the student may be appointed to a permanent position without further competition.

The Undergraduate Scholarship Program - is considered an attractive benefit companion to the Co-Op Program. The program allows the agency to pay tuition and books to cover the cost for the technical Co-Op's last year of college. To date, this Program supports 4 students: 2 Caucasian men, 1 Caucasian woman, and 1 Asian man.

Graduate Fellowship Program - is considered an attractive benefit to recruit, develop and retain highly-qualified, diverse individuals for technical careers at the NRC. This program also develops a pool of experts in engineering, science, and other technical disciplines related to the NRC's mission. Three employees are currently participating in the Program: 2 Caucasian men and 1 Hispanic man. The stipend for the program was

increased this year to 90% of salary to attract more applicants. Forty-one applications (12 from NRC employees) were received for FY 2004 as compared to 11 applications in FY 2003. Selections are pending.

Student Loan Repayment Program - is a tool to recruit or retain employees who have unique qualifications needed by the agency. Where the agency determines that without a student loan repayment it would be difficult to recruit for and fill a mission-critical position or to retain an employee with critical skills and competencies, it may repay a portion of a candidate's or an employee's qualifying, Federally insured student loan. This benefit obligates an employee to remain with the NRC for 3 years. During FY 2004, a total of 13 employees (1 African American, 1 Hispanic, 5 Caucasian women, and 6 Caucasian men) were approved for student loan repayment totaling \$130,000.

The Office of Personnel Management Scholarship For Service (SFS) - is a unique program designed to increase and strengthen the cadre of Federal Information Assurance Professionals that protect the government's critical information infrastructure. This program provides scholarships that fully fund the typical costs that students pay for books, tuition, and room and board while attending an approved institution of higher learning. The agency may offer students other paid employment while they are on scholarship provided it does not interfere with their studies. NRC participated in the SFS Symposium last July in an effort to recruit Information Technology Co-Op students. This was a very successful event. Four candidates were selected: 1 Hispanic woman, 2 Asian men, and 1 white woman. This program is a great resource for obtaining diverse entry-level IT professionals.

The Oak Ridge Institute of Science and Education's Historically Black Colleges and Universities (HBCU) Research Program and Science Day Career Fair - is targeted for students from all the HBCU's that have schools of engineering.

Recruitment and Applicant Tracking Process - Recruiters play a critical role in developing applicant interest and attracting highly qualified diverse candidates. During FY 2004, managers, serving as recruiters, were authorized to offer exceptional candidates an "invitation letter" for an NRC interview. This invitation is initially based on a review of the applicant's resume and an interview during a recruitment event. During FY 2004 and through November 9, 2004, 22 applicants received invitational letters to interview at headquarters. All of these applicants applied for the NSPDP and were among the best qualified. Sixteen of these applicants (10 Caucasians, 3 African Americans, 2 Asians, and 1 Hispanic) accepted offers to come to headquarters for an interview. To-date, offers of employment have been made to 7 of the 16 applicants.

In general, the application process requires potential candidates to apply for specific vacancies via NRCareers, the agency's electronic application system. Upon receipt, the Office of Human Resources (HR) conducts an initial review of the application to determine minimal qualifications. Program managers and HR staff follow-up closely on the most promising candidates. Additionally, advertisements announcing opportunities at NRC are placed in local college publications prior to an NRC recruiter's visit.

Career Development

NRC continues to maintain its focus on training, development, and retention of a highly qualified and diverse staff, and has placed greater emphasis on planning and implementing knowledge management and knowledge transfer strategies. The agency also uses details and rotational assignments to broaden the experience of technical and administrative staff. Leadership development programs for both mid-level and senior-level positions include training activities and rotational assignments to provide and strengthen participants' skills consistent with the Office of Personnel Management's (OPM) leadership competencies. Participation in these activities, including those listed below, provides employees the opportunity to gain additional experience and make contributions that support mission accomplishments.

Administrative Staff Development - During FY 2004, HR issued a yellow announcement to all employees informing them of the various formal developmental programs the agency sponsors to support administrative staff development. Nine African Americans and 2 Caucasian women are participating in the Administrative Skills Enhancement Program, 1 African American woman in the Information Technology/Information Management Program, and Administrative Skills Enhancement Program. Currently, no employees are participating in the Congressional Fellowship Program or the International Association of Administrative Professionals Program.

Upward Mobility - During FY 2004, the agency selected 17 employees (3 African American females, 1 African American male, 2 Asian Pacific American females, 10 Caucasian females and 1 Caucasian male) for paraprofessional positions which offer administrative and clerical employees opportunities to move into jobs with greater challenge and career potential. This number of paraprofessional selections in an organization with a highly technical mission reflects the agency's continuing interest in upward mobility for the administrative support staff in the NRC.

Leadership Development - The Leadership Potential Program (LPP) and the Senior Executive Service Candidate Development Program (SES CDP) enhance the agency's workforce diversity and succession strategies for supervisory and managerial positions. As noted in the last EEO Briefing, a diverse group of employees was selected for the FY 2003 LPP class. Twenty-five selections were made of which 44% were minorities, 20% Caucasian women, and 36% Caucasian men. This class graduated from the program on October 28, 2004, and 11 graduates have been selected for supervisory positions (6 Caucasians, 4 African Americans, and 1 Asian). The last SES CDP solicitation resulted in 31 selections: 22% minorities, 20% Caucasian women, and 58% Caucasian men. Upon completion of the program and certification by the Office of Personnel Management, this class will be eligible for appointment to SES positions. This class is expected to graduate in December 2005. These candidates will increase the potential for enhanced diversity at the SES level.

Knowledge Transfer - The proportion of the agency staff over the age of 55 has increased by 1% in each of the last four years to 25%. Older, more experienced staff are in a position to make vitally important contributions to agency programs, particularly in the area of knowledge transfer, and are encouraged to actively participate in mentoring and coaching, as well as their own continued development. The knowledge

base of these employees is invaluable, and their careers serve as a model for newer staff. As office and regional managers continue to pursue knowledge management and transfer strategies, they are likely to turn increasingly to older employees and ask them to play a prominent role in the process.

These career development strategies help address the issue raised by the Advisory Committee on Age Discrimination regarding the impact of age and performance appraisals, and the perception that for some older staff performance appraisal ratings declined with age. The EDO issued a memorandum to office directors and regional administrators as a reminder to offices and managers to use only performance-based factors when evaluating employee performance.

Equal Employment Opportunity Commission's Guidance and Compliance - The Equal Employment Opportunity Commission issued new policy guidance and standards for maintaining an effective affirmative employment program (Management Directive 715). This guidance is designed to enhance agency accountability to ensure that all employees and applicants for employment enjoy equality of opportunity in the Federal workplace regardless of race, sex, age, national origin, color, religion, or disability. This directive requires Federal agencies to evaluate their program effectiveness and annually conduct agency assessments including supporting data analysis. SBCR has lead oversight responsibility for monitoring agency progress in this area. SBCR, along with contractor assistance for data collection, will provide the Commission a status of agency progress against the new requirements under separate cover in February 2005.

Federal Compliance concerning Non-discrimination based on Disability - The agency is institutionalizing the disability program in a single management directive to ensure that all aspects of the program are addressed and that it is consistently implemented. NRC has recently updated its *Information Guide for People with Disabilities* to ensure that all information is current. Activities are underway to improve the administration of NRC's Management Directive (MD) 11.6, Financial Assistance Program Directive. This update will reflect SBCR's oversight responsibilities over organizations that receive NRC financial assistance. Specifically, MD 11.6, which outlines the agency's program for awarding and tracking grants, will describe SBCR's responsibilities to conduct periodic compliance reviews to ensure that financial recipients do not discriminate against disabled individuals and define related reporting activities to DOJ. Plans are underway to issue the revised MD during FY 2005. Staff are evaluating approaches to conducting compliance reviews which will also commence during FY 2005.

In addition, efforts to improve the accuracy of reporting disability-related data to DOJ have been completed. SBCR now obtains data on grants for DOJ reporting from a database maintained by the Office of Administration. This method ensures centralized reporting and enhances reliability of the data.

Small Business Activity - The Small Business Program provides advocacy to all categories of small and women-owned businesses in NRC's procurement process. Last year, SBCR developed a four-pronged strategy to improve the status of our small business accomplishments: (1) issuance of a statement of commitment from the EDO to reflect senior

management support, (2) enhancement of communications with program offices and closer monitoring of accomplishments, (3) training key staff with procurement responsibilities, and (4) outreach efforts to identify qualified small businesses in the scientific and engineering areas.

Our assessment of the impact of these strategies is that they have had a positive impact on the NRC's small business accomplishments. In FY 2002, the NRC met only two of its six small business goals. After implementation of these initiatives in FY 2003, the agency exceeded 3 of its 6 small business goals and narrowly missed meeting a fourth. In FY 2004, preliminary data shows that NRC met and exceeded 5 of its 6 goals. While it appears that this strategy is having a positive impact on the NRC's accomplishments, there is still work to be done. A key focus area for FY 2005 is to strive to work more closely with service-disabled, veteran-owned small businesses, the one goal which NRC, as well as most other Federal agencies, has not been able to meet.

Summary and Challenges:

Several agency systems and activities promote effectiveness and efficiencies in EEO and diversity management: (1) Enhanced management accountability through the Comprehensive Diversity Management Plan, the SES Performance Management System, and office/region operating plans; (2) training to provide managers tools to support EEO and diversity management; (3) the Leadership Potential Program, SES Candidate Development Program, mentoring, coaching, and (4) continued use of aggressive recruitment strategies, including incentives to attract a pool of diverse candidates at all levels. These systems and activities are intended to enhance the advancement potential of all employees and to support the agency's goal to recruit, develop, and retain a diverse workforce, and to increase diversity in senior level positions.

We have made progress and more needs to be done. With continued strong leadership commitment, and guidance and support from SBCR and HR, we will maintain a common focus to achieve success in these areas. NRC is committed to be a model agency, where all employees are valued and have an equal chance to succeed, thereby increasing organizational capacity to achieve the agency's mission.

/RA Martin J. Virgilio Acting For/

Luis A. Reyes
Executive Director for Operations

Attachments:

1. Index of Responses to SRM
2. Statement from the Director, Office of Research
3. EEO Advisory Committees Joint Statement
4. Workforce Profile Data

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ADAMS ACCESSION NUMBER: ML043230419; Att. 4: ML043230623;

Package: ML043230413

*SEE PREVIOUS CONCURRENCE

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NAME	B. Williams*	C. Kelley*	P. Bird*	P. Norry	L. Reyes
DATE	11/18/04	11/18/04	11/19/04	11/22/04	11/22/04

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Index of Responses to SRM

Staff Requirements Memorandum of June 10, 2004, directed the staff to address a number of topics at the next EEO briefing. The following table lists the topics and indicates the page of the paper on which the topic is discussed.

Topic	Page
The staff should further develop the Comprehensive Diversity Management Program....	3
Staff should strive to maintain the high level of success achieved in FY 2003 in recruiting for entry-level positions and should expand the geographic areas and institutions within the United States that serve as sources for its recruitment of women and minorities.	6

At the next semiannual briefing on the EEO program, staff should provide a comprehensive briefing on activities for enhancing NRC's workforce diversity, including year-end demographic data, and address the following Commission concerns:

1. A broad assessment of the improvement achieved in diversity management accountability through the new SES performance appraisal system compared to the FY 2003 appraisal cycle and the need for further refinement of appropriate diversity management accountability performance measures.	3
2. Development of performance measures for EEO program activities.	3
3. Impact of grade GG-13 through GG-15 recruitment activities on advancement of NRC's current employees.	6
4. Communication of existing career development pathways for administrative and support staff and identification of barriers to upward mobility.	10
5. Fairness, equity, and motivation issues affecting NRC employees over 50.	10
6. A more detailed assessment of how NRC compares to the six-point model EEO program established by the Equal Employment Opportunity Commission.	11
7. A year-end update on completion of required diversity training for managers and supervisors.	2
8. Status of NRC compliance with applicable Federal regulations concerning non-discrimination based on handicap.	11

**Office of Nuclear Regulatory Research
November 2004**

By Carl J. Paperiello, Director

Chairman Diaz, Commissioner McGaffigan, Commissioner Merrifield, thank you for giving me this opportunity to address the Commission regarding human capital, equal employment opportunity (EEO), and diversity management in the Office of Nuclear Regulatory Research (RES). In RES, we recognize human capital — our dedicated people and their wealth of knowledge and expertise — as the cornerstone of our activities and our ability to make measurable contributions to achieve the mission of the U.S. Nuclear Regulatory Commission (NRC).

Because this is my first year as Office Director of RES, I would be remiss if I did not acknowledge the exceptional accomplishments of my predecessor, Ashok Thadani, and the RES management team. When I came to RES last March, we had a dedicated and diverse cadre of talented professionals, and our EEO demographics were very favorable. In my current capacity as Office Director, I am committed to continuing and building upon that legacy.

In RES, we recognize that our management and staff are most efficient and effective when they are appropriately deployed, fully engaged in meaningful contributions to the agency's mission, and recognized for their performance. To cultivate and retain an outstanding and highly diverse workforce, we focus on each of these considerations:

- We use innovative recruitment strategies and base our hiring decisions on bringing the most qualified and outstanding individuals to our research team. To do this we seek people with varying backgrounds and diverse viewpoints because they greatly enhance both the quality of our work and the work environment of RES and the NRC as a whole.
- We use both formal and informal development and training programs — based on sound succession planning — and we deploy, recognize, and reward our staff so that each individual understands and appreciates his or her role in achieving the agency's mission and goals. In so doing, we cultivate and retain the current and future leaders of the office and the agency.
- We have taken the first steps to implement a formal knowledge transfer and knowledge management program to ensure that RES acquires and maintains the competencies needed to implement both our office's operating plan and the agency's strategic plan.
- We strive to strengthen managerial and supervisory accountability for setting individual and organizational performance expectations and for providing timely and complete feedback.
- Above all, we foster a work environment that is free of discrimination and provides opportunities for all of our employees to optimally use their diverse talents in support of the NRC's mission and goals.

DEMOGRAPHICS

At the end of Fiscal Year (FY) 2004, RES had a total of 218 permanent employees, 49% of whom were women and minorities. In that year, we also increased our African-American female representation by 50%, our Hispanic representation (both male and female) by 40%, and our Native American representation by 50%.

Comparison of the RES Workforce Profile from September 30, 2003, to September 30, 2004

Ethnicity	Women		Men		Total	
	FY 2003	FY 2004	FY 2003	FY 2004	FY 2003	FY 2004
African-American	5% (10)	7% (15)	3% (6)	3% (6)	8% (16)	10% (21)
Asian/Pacific	3% (6)	2% (5)	13% (26)	13% (28)	16% (32)	15% (33)
Hispanic	1% (2)	1% (3)	1% (3)	2% (4)	2% (5)	3% (7)
Native American	0% (0)	0% (0)	0% (1)	1% (2)	0% (1)	1% (2)
White	18% (38)	20% (43)	55% (114)	51% (112)	74% (152)	71% (155)
TOTALS	27% (56)	30% (66)	73% (150)	70% (152)	100% (206)	100% (218)

In addition to the overall diversity of our workforce, RES has made progress in recruiting and placing women and minorities into management and other key positions. In particular, we have made significant progress in hiring women and minorities into our “pipeline.” In fact, in FY 2004, 46% of the RES Management Team [including 19 out of 41 Senior Executive Service (SES), first-line supervisors, and team leaders] were women and minorities.

Totals by Management Level as of September 30, 2004

	Women	Minorities	Women & Minorities	Total Population
SES	14% (2)	14% (2)	29% (4)	14
First-Line Supervisors	6% (1)	50% (8)	56% (9)	16
Team Leaders & TAs	45% (5)	9% (1)	55% (6)	11
Total	26% (8)	35% (11)	46% (19)	41

Hiring Activity

As you can see, in FY 2004, RES made important strides in recruiting and selecting a diverse group of applicants. Toward that end, we selected 33 female or minority candidates for a total of 67% of 49 merit-based selections. By comparison, in FY 2003, only 6 (40%) of our 15 merit-based selections were women or minorities. This represents a significant (68%) increase in hiring women and minorities in FY 2004 compared to FY 2003. We intend to continue to utilize strategies to attract a diverse pool of applicants for vacant positions.

The breakout of the 49 selections in FY 2004 includes 15 (31%) white females — 1 of whom we promoted into the SES program — and 18 (35%) minority representatives. The 4th Quarter was particularly noteworthy, as RES made 17 merit-based selections, of whom 9 (53%) were women or minorities, and 5 of those 9 (56%) were selected for supervisory positions. RES also supported 17 career ladder promotions, of which 4 (24%) were for white females, and 7 (41%) were for minorities.

Comparison of FY 2003 and 2004 Hiring Activities

Ethnicity	As of September 30, 2003 (Includes 3 intern hires)			As of September 30, 2004 (Includes 4 intern hires)		
	Men	Women	Total	Men	Women	Total
African-American	0	1	7% (1)	2	7	18% (9)
Asian/Pacific	1	0	7% (1)	5	2	14% (7)
Hispanic	0	0	0%	1	0	2% (1)
Native American	0	0	0%	1	0	2% (1)
White	7	6	87% (13)	16	15	63% (31)
TOTALS	8	7	15	30	19	49

Nuclear Safety Professional Development Program (NSPDP) Recruitment

Of our 15 merit-based selections in FY 2003, we recruited 3 NSPDP candidates from outside the agency, and 2 were women or minorities. The 49 merit-based selections in FY 2004 included 4 interns recruited from outside the agency, and 2 were women or minorities. Our 49 selections for the year included 5 (10%) candidates from within RES, 26 (53%) from within the NRC, and 18 (37%) from outside the agency.

Attrition Rates

During FY 2004, RES experienced a 14% attrition rate, meaning that 30 employees left the office. Of those 30 employees, 16 (53%) retired, 12 (40%) transferred out of RES but remained with the NRC, and 2 (7%) separated from the agency. A total of 78 (36%) of our current employees are or will be eligible for retirement within the next 3 years.

WORK ENVIRONMENT

While our demographics tell us that RES is doing well with regard to our numbers of female and minority staff, we also realize that it is not enough to simply hire the best-qualified professionals; we must also develop our employees and give them the opportunity to excel. We want everyone to feel that they are integral to the Research team, and that we value their input in decision-making and their contributions to achieving our goals. We strive to be an “Employer-of-Choice,” and we have made — and continue to make — progress in transforming our work environment into one that is supportive and comfortable for all RES staff.

One of the main issues for our staff has been lack of face time with RES managers because our managers’ had too large a span of control. To address this issue, we have reorganized the office to create additional positions for section chiefs and team leaders to ensure that each of our managers is able to meet the needs of his or her staff. Along with these new supervisory positions, we hold more regularly scheduled meetings within Divisions, Branches, and Sections. I have also recently instituted **storyboarding** sessions, where staff, their line management, and I meet to improve the quality of our products by building a common vision on critical projects.

Through our budget-related lessons learned, RES had also previously identified that we needed more extensive involvement with mid-level management during the Planning, Budgeting, and Performance Management (PBPM) process. As a result, we held more meetings to discuss budget expectations, relay instructions, and obtain staff feedback. We also gave the Division Technical Assistants an integral role in the RES PBPM process, in that they gather and disseminate information and comments from all levels of division staff. In addition, RES Project Managers constitute an important link in revising project milestones in the office Operating Plan, which we subsequently use to develop activities and resource requirements for the next budget cycle. We also envision our recently hired Section Chiefs having substantial involvement in our future budget processes.

RES also values **feedback** from our staff in all matters of office operations and, toward that end, we have improved our office suggestion program. In addition to the existing suggestion boxes in RES work areas, in January 2004, we launched an online “feedback portal” through which RES staff can easily and quickly submit comments and suggestions from their own workstations, while preserving their anonymity if they so choose. All comments and suggestions become “controlled correspondence” so that the appropriate Division Directors can take appropriate and timely action to address and respond to our employees’ concerns. We post all feedback and related responses on the office’s internal Web page to share this information openly with all RES staff.

Communication is another important focal point for improving our work environment.

As a result, we dedicated our recent management retreat (in August 2004) entirely to the topics of communication and team building. At that retreat, RES management worked together to identify communication-related initiatives that would bear fruit in the near term. In addition, since becoming Office Director of RES, I started the monthly RES seminars and have held several all-hands meetings to share our vision, activities, and achievements with the RES staff and others throughout the agency. Toward that end, for example, I held an all-hands meeting to share the results of our management retreat with RES staff immediately after the retreat.

RETENTION AND DEVELOPMENT

In RES, we challenge both new and experienced staff with meaningful and critical projects. For example, Shana Helton (who we hired under the NSPDP program) initiated the agency's Risk Communication project, which Autumn Szabo (an entry-level employee) subsequently completed. The high quality of the resultant risk communication guidelines and training materials speaks volumes about the skills of our staff and their dedication to achieve meaningful results that contribute to the agency's success in achieving its mission. Similarly, Mike Switzer (another NSPDP hire) has played an integral role in our phenomenon identification and ranking table (PIRT) project. We also strive to challenge our more senior employees. For example, in the brief time he has been with the NRC, Abdul Sheikh (a new senior hire) has helped to resolve Generic Issue 156.6.1, "Effects of Postulated Pipe Break on Dry Wells and CRD Piping in BWRs."

RES also partners with various universities, both to identify potential employees and to exchange knowledge with academic experts. In addition, the summer intern program gives students (most of whom are still pursuing their bachelor's degrees) a chance to gain valuable experience and information about the NRC, while helping us to identify high-quality candidates to meet the future needs of RES and the agency as a whole. In fact, last year, one of our female summer interns returned to the NRC under the NSPDP, as did one of our co-op students. In addition, our cooperation with universities promotes a development programs through which several college professors are currently completing their sabbaticals at the NRC.

INITIATIVES FOR EEO

The RES management team actively tracks our EEO progress in the "Corporate Management Activities" section of our office Operating Plan, which is subdivided into the four guiding principles from the agency's "Affirmative Employment Plan."

In the area of creating an accessible and discrimination-free environment, we strongly encourage RES management to participate in diversity, sexual harassment prevention, and other EEO training and diversity-related activities. All of our managers and first-line supervisors have completed, or are scheduled to complete, the agency's EEO training before the end of calendar year 2004. In addition, we have benefitted greatly from having an onsite EEO counselor on staff. RES also continues to support our employees' needs with such things as ergonomic chairs, keyboards, and mice.

With regard to employee development and fair and equitable career enhancement, RES regularly gives awards to our "employee of the month," and six of our employees of the month

in FY 2004 were minorities and women. We also had many RES employees selected for the NRC's Distinguished and Meritorious Service Awards and have recognized several employees with instant cash awards.

We also support the welfare of all employees and recognize and appreciate the diversity that we have fostered in RES. In 2004, we supported 14 employees on the fixed-based telecommuting program, as well as numerous employees' use of short-term project-based telecommuting, work-at-home, and part-time schedules to accommodate family, health, and schooling issues. In addition, throughout the year, RES has supported an administrative brainstorming group of secretaries, administrative staff, and managers in order to share concerns and identify effective solutions for the office's administrative business processes.

CHALLENGES

The Office of Nuclear Regulatory Research is fortunate to benefit from a diverse staff at the staff, supervisory, and management levels. Our EEO challenges largely relate to the age of the staff and are intertwined with human capital. About 27 percent of the RES staff either are currently eligible for retirement or will become eligible in FY 2005, and this number will increase to 35 percent within the next 3 years.

This reality creates dual succession planning and knowledge transfer challenges. On the one hand, we strive to retain those who wish to stay by stimulating them with demanding research opportunities. On the other hand, we need to recruit highly qualified replacements for those who choose to retire, and we need to ensure that they effectively transfer critical knowledge before they leave the agency. A related challenge is that some research staff do not consider supervision or management as a desirable career path. In particular, this group includes individuals who have advanced degrees and expertise in technical areas that are essential to the NRC's mission. Some of these individuals have told me that they view the Senior Level Service (SLS) as a more desirable career path than the Senior Executive Service (SES). As Office Director of RES, I am examining strategies to address these succession planning challenges.

CONCLUSION

In conclusion, I would like to reiterate that I am proud of our accomplishments in the areas of human capital, EEO, and diversity management. I am committed to building upon our successes as we address our current challenges to cultivate and retain an outstanding and highly diverse workforce. Toward that end, we will continue to use innovative recruitment strategies complemented by both formal and informal development and training programs. We will also continue to deploy, recognize, and reward our staff so that each individual understands and appreciates his or her role in achieving the agency's mission and goals. We will continue to strengthen supervisory accountability for setting performance expectations and providing feedback. In addition, we will proceed with implementing our formal knowledge management program to ensure that we acquire and maintain the necessary competencies. Above all, we will continue to foster a work environment that enables all of our employees to optimally use their talents in support of the NRC's mission and goals.

Joint EEO Advisory Committee Statement

The Joint Equal Employment Opportunity (EEO) Advisory Committee is composed of the following five authorized committees: Advisory Committee for African Americans (ACAA); Asian Pacific American Advisory Committee (APAAC); Committee on Age Discrimination (CAD); Federal Women's Program Advisory Committee (FWPAC); and Hispanic Employment Program Advisory Committee (HEPAC). The EEO Committees work in concert with the Office of Small Business and Civil Rights (SBCR) to contribute to the agency goal of creating "a work environment that provides opportunity for all employees to optimally use their diverse talents in support of NRC's mission and goals." The EEO Advisory Committees contribute to achieving this goal by providing advice and recommendations to the Director, SBCR regarding factors that may impact policies, procedures, and practices related to the selection, promotion, placement, training, upgrading, and career development of NRC employees or selection of applicants for employment.

The agency's commitment to EEO and diversity management goals is clearly stated in the NRC's Strategic Plan and the Comprehensive Diversity Management Plan (CDMP). Specifically, NRC will take the necessary steps to "foster a work environment that is free of discrimination and provides opportunities for all employees to optimally use their diverse talents in support of the NRC's mission and goals." We also view the EDO's current effort to include standard EEO and Diversity goals in all offices' operating plans a positive step towards ensuring accountability by the agency's management team for achieving progress. In this regard, the agency should continue to promote a discrimination-free work environment and to practice EEO and diversity management principles when making recruitment, staffing, and placement decisions based on merit.

While progress has been made, especially in the area of minority recruitment for entry level positions at the grade levels GG-5 through GG-12, much remains to be done. NRC's goal is to build a high performing diverse workforce that is reflective of America's diversity at all levels in the organization: entry level, mid-level, supervisory, and senior management level. The EEO Advisory Committees are working with SBCR and HR to help assure that the agency continues to move toward its goals.

However, other challenges remain:

1. The primary challenge facing the agency is to enhance representation of women and minority groups at all grade levels. For fiscal years (FYs) 1999 through 2004, the percentage of women in NRC's workforce dropped from 38% in FY 1999 to 37% in FY 2004. Over the same period, the representation of minorities increased from 22.4 to 25.6 % (FY 2004). The commitment to increase representation in entry level positions should be maintained.

2. Representation of minorities in the Senior Executive Service (SES) has not shown significant gains. The data for fiscal years 2000 and 2004 show that, with the exception of an improvement in the representation of white women, there has been no significant change in percentage in minority representation in the SES over this period:

African American	6 to 5 (decrease)
Asian Pacific American	4 to 4
Hispanic	1 to 1
Native American	0 to 1 (increase)
White Women	11 to 15 (increase)

The SES Candidate Development Program provides an excellent opportunity for the NRC to continue to demonstrate its commitment to diversity. However, such a commitment to diversity is not demonstrated by the latest data on advancements to SES and SLS positions. Consistent with the CDMP, we recommend a sustained focus on increasing representation of under represented groups in management, SES, and senior level positions and enhancing representation in feeder groups (Grades GG 13-15) for SES, non-SES management, supervisory, and senior level positions. Succession plans should also include consideration of diversity.

We believe that this situation also stands a better chance of improvement if more qualified women and minorities are hired at mid-levels and provided challenging assignments and exposure to management through rotations.

To support career development, management should stress mentoring relationships between senior staff, managers, and junior staff. It is well established that good advice, sound guidance, coaching and inspiration are keys to staff development at the NRC. Many minority and junior employees would benefit from a positive and enriching mentoring relationship with senior staff and managers. Supervisors should be cognizant and supportive of staff development for employees under their supervision and should continue to place emphasis on this effort by providing minority employees with challenging opportunities. In addition, fast track strategies for retention of minorities and women should include exposure to senior management to facilitate advancement beyond the GG-12 level.

3. NRC continues to support diversity in career development activities such as demonstrated in the Leadership Potential Program Class of 2004. This class is composed of 44% minorities, 36% white males and 20% white females. From a total of 25 selections the breakdown of the proportion (44%) of minorities in the LPP is: 24% (6) African Americans, 8% (2) Hispanics, and 12% (3) Asian Americans. Consistent with the CDMP, we recommend a sustained focus on increasing representation of under represented groups in the Leadership Potential Program.
4. A gap still exists in the developmental opportunities in the administrative ranks at Headquarters and in the Regions. We appreciate NRC's issuance of a yellow

announcement that provided information regarding developmental opportunities for administrative support staff. We further recommend emphasis on effective utilization of the full workforce be expanded to include increasing advancement opportunities in particular for administrative support personnel.

5. We are still exploring the causes of decreasing performance appraisal ratings for some older employees and are exploring alternatives for addressing this issue.

In conclusion, the EEO committees are encouraged by the efforts made by the agency thus far and we recommend the following road map for success:

- A. Make management accountable, through each individual manager's appraisal, for meeting the agency's outcome measures defined in the CDMP. Managers should consider all employees equally when assigning work to ensure that all groups are provided an equal opportunity to demonstrate their capabilities to receive and perform tasks of increased complexity and responsibility. Consider diversity when identifying highly qualified candidates for assignment to senior positions.
- B. The Commission should identify a time frame goal for meeting the CDMP outcome measures. Show on an annual basis, progress at all levels toward the CDMP demographic goal. Ensure that the hiring of Native Americans is emphasized.
- C. Make a commitment to better support the developmental needs of minority employees with both internal and external training. Aggressively plan for rotations and challenging assignments to expose more women and minorities to management. This will allow high performers to be recognized and accelerated to more responsible positions.
- D. Increase the focus on issues concerning the advancement of administrative staff. Identify clear career paths for administrative personnel.
- E. More fully utilize experienced senior staff and managers in transferring their knowledge and experience to junior staff and particularly to new hires. Involve senior staff in the important work of the agency and utilize them as mentors to transfer valuable knowledge, skills, and experience. Provide incentives for senior staff members with NRC corporate knowledge (expertise and experience) to transfer, through mentoring, their knowledge to junior staff.
- F. Conduct interviews with a sample population of non-supervisory employees over the age of 50 with at least 10 years of service whose performance appraisal scores have deteriorated. The purpose of the interviews with this targeted group and their supervisors will be to determine the causes of the deterioration.
- G. Establish a database, starting with FY 2000, that contains demographic characteristics, i.e., age, length of service, etc., of those selectees included on the "Best Qualified" or "A" candidate lists for competitive promotions. This information could be used by all of the EEO Advisory Committees to more adequately provide advice and assistance to the Commission on matters related to age related EEO matters.