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CONSOLIDATED EQUAL EMPLOYMENT OPPORTUNITY PROGRAM PLAN  
FY 1986

U.S. NUCLEAR REGULATORY COMMISSION

OFFICE OF SMALL AND DISADVANTAGED BUSINESS UTILIZATION  
AND CIVIL RIGHTS

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## PREFACE

This document outlines the consolidated agency-wide Equal Employment Opportunity (EEO) Program Plan for FY 1986. EEO is a fundamental policy of the Federal government, and the NRC is committed to providing a personnel management system free from discrimination for all employees and applicants for employment. Moreover, the NRC recognizes its obligation to implement programs that will eradicate underrepresentation or barriers to equal opportunity wherever these may exist. Thus, the Commission and senior NRC management are committed, as a matter of policy, to the establishment and pursuit of vigorous and effective Equal Employment Opportunity and Affirmative Action programs.

## 1. EXECUTIVE SUMMARY

### 1.1 Purpose

This is the second Consolidated EEO Program Plan prepared by the staff of the Office of Small and Disadvantaged Business Utilization/Civil Rights (OSDBU/CR). The Plan structures the strategy for implementing and monitoring EEO and affirmative action programs and activities agency-wide in FY 1986.

### 1.2 Background

NRC staff and managers have prepared a number of EEO related plans and other initiatives since the agency was established in 1975. Review of these multiple plans and program reports showed the need to prepare a single, consolidated EEO Program Plan setting both overall directions and specific but achievable objectives. This plan permits flexible implementation by individual executives and managers, and makes executives and managers responsible and accountable for achieving the program's objectives.

### 1.3 Analysis of Current EEO Programs

NRC has conducted EEO and affirmative action programs since its establishment. A number of programs have been implemented to respond to government-wide affirmative employment objectives. A wide range of both formal and informal career development opportunities have been provided to all employees. Appropriate efforts have been made to increase the representation of minorities and women in the workforce. Programs have been directed at disabled veterans and the handicapped.

The numbers of minorities and women in technical and scientific occupations are small in the civilian labor force. This has had an unfavorable impact on the NRC's ability to increase the representation of these groups in the Agency's workforce. Additionally, public health and safety concerns have sometimes restricted NRC managers from hiring other than fully trained, experienced staff, which further limits opportunities for either entry-level hiring or large scale development of NRC staff.

NRC has the appropriate organization structure in place to achieve EEO hiring goals. The activities themselves need to be results oriented and systematically monitored against specific program objectives. Greater emphasis will be placed on coordinating

the various affirmative employment programs while retaining their individual identity. Recruiting and placement strategies should continue to be examined critically to maximize the potential for reaching minorities, women and other protected groups, as appropriate, and then encouraging them to accept NRC employment. More emphasis needs to be placed on developing and utilizing current NRC employees. Most important, managers and supervisors need to know their EEO responsibilities, plan realistic accomplishments, and be held accountable for proper implementation of the program. The Commission and NRC senior management are committed to achieving demonstrable progress in each of these areas.

## 2. INTRODUCTION

### 2.1 Statutory and Regulatory Basis for NRC EEO Programs

Equal Employment Opportunity (EEO) is a system of employment practices under which individuals are not excluded from participation, advancement, or benefits because of their race, color, religion, sex, national origin, age, handicap, or other factor which cannot lawfully be the basis for employment actions. EEO provides an employment system in which neither intentional nor unintentional discrimination operates.

Title VII of the Civil Rights Act of 1964 is the primary foundation for all EEO programs in the Federal government. Several Executive Orders and Public Laws further emphasize government policy to provide equal opportunity in Federal employment.

Executive Order 11478 of August 8, 1969 states, in part, that "it is the policy of the Government of the United States to provide equal opportunity in Federal employment for all persons, to prohibit discrimination in employment because of race, color, religion, sex or national origin, and to promote the full realization of equal employment opportunity through a continuing affirmative program in each executive department and agency." This executive order further states that "the head of each executive department and agency shall establish and maintain an affirmative program of equal employment opportunities for all civilian employees and applicants for employment within the agency's jurisdiction."

The Equal Employment Opportunity Act of 1972 (P.L. 92-261) gave the Civil Service Commission authority to enforce antidiscrimination provisions within the Federal government. The Federal Rehabilitation Act of 1973 extended protection against discrimination to employees and applicants for employment on the basis of mental or physical handicap. The Fair Labor Standards Amendments of 1974 (P.L. 93-259) established provisions in Federal government employment for nondiscrimination due to age; these were further expanded by the Age Discrimination in Employment Act of 1978 (P.L. 90-202). Reorganization Plan No. 1 of 1978 and Executive Order 12067 gave the Equal Employment Opportunity Commission lead coordinating responsibility for all Federal equal employment opportunity programs and activities. Further regulations are codified under 29 CFR 1613.

## 2.2 EEO Responsibilities and Authorities

Federal regulations provide that each agency head is required to exercise personal leadership in establishing, maintaining, and carrying out a continuing affirmative program designed to promote equal opportunity in every aspect of agency personnel policy and practice in the employment, development, advancement, and treatment of employees. The EDO is the senior NRC staff official responsible for operating and monitoring the overall EEO program. The Director, OSDBU/CR, is the principal staff manager responsible for assisting the EDO in managing NRC EEO programs, and for advising the Commission on EEO matters.

## 2.3 EEO Constituent Group Committees

NRC has four recognized employee committees which advise the EDO and other agency officials on EEO matters. Committees meet regularly to discuss EEO matters of interest to NRC staff and periodically relate issues and concerns to management.

The EEO Advisory Committees are providing a valuable service to the Agency, and they are to be encouraged in their work by assistance from OSDBU/CR and the staff management. This assistance will include providing the EEO Advisory Committees with full and timely access to information, consultation on the development of subsequent EEO plans and policies, and cooperation in providing time for members to attend meetings of the committees.

The Affirmative Action Advisory Committee (AAAC) advises EDO and the Director, OSDBU/CR, on affirmative action matters. The AAAC also reviews EEO plans as formulated and implemented by the Civil Rights Program Manager (CRPM) in OSDBU/CR, the Federal Women's Program Manager (FWPM), the Division of Organization and Personnel (O&P), ADM, and other NRC offices.

The Federal Women's Program Advisory Committee (FWPAC) advises the FWPM, the Director, OSDBU/CR and the EDO regarding women's issues and concerns. The FWPAC also reviews EEO plans formulated and implemented by OSDBU/CR and ADM as they relate to NRC women employees and applicants for employment.

The Committee on Age Discrimination advises the Director, OSDBU/CR, and the EDO, in carrying out both the spirit and the intent of the Age Discrimination in Employment Act of 1978, as amended. The Committee does not become involved in individual cases, but NRC employees are urged to bring to the attention of the Committee any generic matters associated with age discrimination.

The Joint Labor-Management Equal Employment Opportunity Committee was established on April 19, 1982, by the NRC and the National Treasury Employees Union (NTEU) to advise management on matters concerning EEO. Half the members are appointed by NRC management and half by the NTEU.

The NRC has also authorized the establishment and operation of an NRC Chapter of Blacks in Government (BIG). This organization advises the Director, OSDBU/CR, and the EDO on matters pertaining to the recruitment and advancement of Black employees.

## 2.4 Overview of the NRC Workforce

As of May 31, 1985, the total NRC workforce of 3367 permanent full-time employees was 68.1 percent male and 31.9 percent female. Members of the four designated minority groups constituted 15.9 percent of the workforce: 10.7 percent were Black, 1.1 percent Hispanic, 3.8 percent Asian-American or Pacific Islander, and 0.2 percent Native American or Alaskan Native. Table 2.1 shows the minority group representation by sex for groups of headquarters offices and each region.

As of May 31, 1985, women constituted 85.8 percent of the workforce at grades GG-1 to GG-8; 61.2 percent of the GG-9 to GG-12 workforce; 9.8 percent of the GG-13 to GG-15 workforce; 6.5 percent of the GG-16 to GG-18 workforce, and 2.9 percent of the SES workforce. Minority group members constituted 29.6 percent of the GG-1 to GG-8 workforce, 20.7 percent of the GG-9 to GG-12 workforce; 11.4 percent of the GG-13 to GG-15 workforce; 2.2 percent of the GG-16 to GG-18 workforce, and 4.4 percent of the SES workforce. Table 2.2 shows the distribution of specific minority group members by sex in these grade groups.

Most minorities and women are clustered in the clerical and administrative fields. With respect to the three most populous professional occupation groups, as of May 31, 1985, women constituted 3.6 percent of those in the engineering occupations, 13.4 percent of the scientific occupations, and 20.8 percent of the attorney group. In the same fields, 12 percent of engineers were minorities, 7.4 percent of scientists, and 7.5 percent of attorneys. Table 2.3 shows the distribution of specific minority groups by sex within NRC occupational groups.

The majority of the NRC workforce is over age 40. As of May 31, 1985, 56.9 percent of employees were 40 years of age or older. Table 2.4 shows the distribution of employees by age within NRC occupational groups.

## 2.5 Progress During FY-1985

A comparison of this year's figures with those provided for FY-1984 shows gains in several important areas. These figures reveal that NRC continues to experience positive results from its Affirmative Action efforts.

Table 2.1 NRC Workforce Profile by Organization as of March 31, 1985  
(Permanent Full-Time Employees)

Office	Total		White		Black		Hispanic		Asian-Amer. Pac. Island		Native Amer. Alaska Native	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
Commission Offices	186 (61.6)	116 (38.4)	168 (55.6)	85 (28.0)	9 (3.0)	29 (9.6)	1 (0.3)	0 (00)	7 (2.3)	2 (0.7)	1 (0.3)	0 (00)
EDO Staff Offices	366 (52.0)	338 (48.0)	290 (41.2)	239 (34.0)	67 (9.5)	91 (12.9)	4 (0.6)	1 (0.1)	3 (0.4)	4 (0.6)	2 (0.3)	3 (0.4)
NHSS	185 (64.9)	100 (35.1)	171 (60.0)	73 (25.6)	6 (2.1)	23 (8.1)	1 (0.35)	2 (0.7)	7 (2.5)	1 (0.35)	0 (00)	1 (0.35)
NRR	480 (76.9)	144 (23.1)	408 (65.4)	112 (18.0)	7 (1.1)	26 (4.2)	5 (0.8)	2 (0.3)	59 (9.5)	4 (0.6)	1 (0.2)	0 (00)
RES	158 (73.1)	58 (26.9)	139 (64.4)	47 (21.0)	3 (1.4)	10 (4.6)	2 (0.9)	0 (00)	14 (6.5)	1 (0.5)	0 (00)	0 (00)
IE	179 (75.5)	58 (24.5)	164 (69.2)	51 (21.5)	6 (2.5)	7 (3.0)	1 (0.4)	0 (00)	8 (3.4)	0 (00)	0 (00)	0 (00)
Region I	199 (76.8)	60 (23.2)	185 (71.4)	49 (18.9)	3 (1.2)	9 (3.5)	3 (1.2)	1 (0.4)	8 (3.1)	1 (1.2)	0 (00)	0 (00)
Region II	192 (75.3)	63 (24.7)	179 (70.2)	26 (10.2)	11 (4.3)	35 (13.7)	0 (00)	1 (0.4)	2 (0.8)	1 (0.4)	0 (00)	0 (00)
Region III	174 (70.7)	72 (29.3)	164 (66.7)	66 (26.9)	5 (2.0)	4 (1.6)	3 (1.2)	0 (00)	2 (0.8)	2 (0.8)	1 (0.4)	0 (00)
Region IV	98 (71.0)	40 (29.0)	91 (66.0)	37 (27.0)	4 (2.9)	2 (1.4)	3 (2.2)	1 (0.7)	0 (00)	0 (00)	0 (00)	0 (00)
Region V	76 (75.2)	25 (24.8)	68 (67.3)	20 (20.0)	2 (2.0)	2 (2.0)	4 (4.0)	2 (2.0)	2 (2.0)	1 (1.0)	0 (00)	0 (00)
Totals	2293 (68.1)	1074 (31.9)	2027 (60.2)	805 (24.0)	123 (3.7)	238 (7.1)	27 (0.8)	10 (0.3)	112 (3.3)	17 (0.5)	4 (0.12)	4 (0.12)

Source: ADM, O&P

Table 2.2 NRC Workforce Profile by Grade Level as of March 31, 1985

Grades	Total		White		Black		Hispanic		Asian-Amer. Pac. Island		Native Amer. Alaska Native	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
GG-1 to GG-8 **	102 (14.2)	615 (85.8)	65 (9.1)	440 (61.4)	30 (4.2)	160 (22.3)	4 (0.5)	5 (0.7)	2 (0.3)	8 (1.1)	1 (0.14)	2 (0.28)
GG-9 to GG-12	163 (38.8)	257 (61.2)	133 (31.7)	200 (47.7)	24 (5.7)	53 (12.6)	2 (0.48)	3 (0.7)	4 (0.9)	1 (0.23)	0 (00)	0 (00)
GG-13 to GG-15	1786 (90.2)	193 (9.8)	1597 (80.7)	156 (7.9)	65 (3.3)	25 (1.26)	21 (1.1)	2 (0.1)	101 (5.1)	8 (0.4)	2 (0.1)	2 (0.1)
GG-16 to GG-18	43 (93.5)	3 (6.5)	42 (91.3)	3 (6.5)	0 (00)	0 (00)	0 (00)	0 (00)	1 (2.2)	0 (00)	0 (00)	0 (00)
SES	199 (97.1)	6 (2.9)	190 (92.7)	6 (2.9)	4 (2.0)	0 (00)	0 (00)	0 (00)	4 (2.0)	0 (00)	1 (0.5)	0 (00)
Totals	2293 (68.1)	1074 (31.9)	2027 (60.2)	805 (24.0)	123 (3.7)	238 (7.1)	27 (0.8)	10 (0.3)	112 (3.3)	17 (0.5)	4 (0.12)	4 (0.12)

\* Permanent Full-time Employees

\*\* Includes Wage Grade Employees

Source: ADM, O&P

Table 2.3 - NRC Workforce Profile by Occupation Group as of March 31, 1985

Occupation	Total		White		Black		Hispanic		Asian-Amer. Pac. Island		Native Amer. Alaska Native	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
Engineers	1268 (96.4)	47 (3.6)	1118 (85.0)	39 (3.0)	30 (2.3)	0 (00)	16 (1.2)	1 (0.08)	103 (7.8)	6 (0.46)	1 (0.08)	1 (0.08)
Scientists	446 (86.6)	69 (13.4)	418 (81.2)	59 (11.5)	18 (3.5)	8 (1.6)	4 (0.8)	2 (0.4)	6 (1.2)	0 (00)	0 (00)	0 (00)
Attorneys	95 (79.2)	25 (20.8)	89 (74.2)	22 (18.3)	4 (3.3)	3 (2.5)	0 (00)	0 (00)	2 (1.7)	0 (00)	0 (00)	0 (00)
Administrators **	398 (61.7)	247 (38.3)	350 (54.3)	192 (30.0)	42 (6.5)	49 (7.6)	3 (0.5)	2 (0.3)	1 (0.16)	3 (0.47)	2 (0.3)	1 (0.16)
Clerical	86 (11.1)	686 (88.9)	52 (6.8)	493 (63.9)	29 (3.8)	178 (23.1)	4 (0.5)	5 (0.65)	0 (00)	8 (1.0)	1 (0.13)	2 (0.26)
Totals	2293 (68.1)	1074 (31.9)	2027 (60.2)	805 (24.0)	123 (3.7)	238 (7.1)	27 (0.8)	10 (0.3)	112 (3.3)	17 (0.5)	4 (0.12)	4 (0.12)

\* Permanent Full-time Employees

\*\* Includes Employees in Professional Non-technical Occupations such as Management Analyst, Program Analyst, Personnel Specialist, Contracts Specialist, Computer Programmer, and Librarian.

Source: ADM, O&P

Table 2.4 NRC Workforce Profile by Age and Occupation Group as of March 31, 1985 \*

Occupation	Total	Under 30	30-39	40-49	50-59	60 and Over
Engineers	1315 (39.1)	87 ( 6.6)	383 (29.1)	405 (30.8)	332 (25.2)	108 ( 8.2)
Scientists	515 (15.3)	38 ( 7.4)	151 (29.3)	151 (29.3)	141 (27.4)	34 ( 6.6)
Attorneys	120 ( 3.6)	4 ( 3.3)	47 (39.2)	35 (29.2)	25 (20.8)	9 ( 7.5)
Administrators	645 (19.2)	32 ( 5.0)	224 (34.7)	225 (34.9)	130 (20.2)	34 ( 5.3)
Clerical	772 (22.9)	241 (31.2)	243 (31.5)	152 (19.7)	106 (13.7)	30 ( 3.9)
Totals	3367 (100)	402 (11.9)	1048 (31.1)	968 (28.7)	734 (21.8)	215 ( 6.4)

\* Permanent Full-time Employees

Source: ADM, O&P

### 2.5.1 Increase in Women Employees

Between March 1984 and March 1985, NRC grew by a total of 68 permanent full-time (PFT) employees, 3299 to 3367, a 2.1 percent increase. During the same time, the number of PFT women employees rose 60 persons, 1014 to 1074, a 5.9 percent increase. Thus, in net, women's percentage of the Agency increase was 88.2 percent or 60 of 68 persons. Women's representation in the Agency PFT population rose from 30.7 percent to 31.9 percent, a 1.2 percent increase.

### 2.5.2 Increase in Minority Employees

Similarly, during the same time, against the 2.1 percent Agency growth, minority group PFT employees increased their number by 52, a 10.8 percent growth. Minority group employees' percentage of the net Agency increase was 77 percent or 52 of 68 persons, and minority group employees' representation in the population grew from 14.6 percent to 15.9 percent, a 1.3 percent increase.

### 2.5.3 Increases at GG-13/15

In grades 13-15, while the Agency increased 33 PFT employees, a 1.7 percent growth, women increased 22 persons, a 12.9 percent growth. Women constituted 66.7 percent of the Agency net growth in this range, and their representation in this population rose from 8.8 percent to a 9.8 percent. In grades 13-15, against the 1.7 percent Agency growth, minority group PFT employees increased by 13 employees, a 6.1 percent rise. The minority group increase represented 39.4 percent of the Agency net increase in this range, and their representation in this population rose from 10.9 percent to 11.4 percent.

### 2.5.4 Representation at SES Levels

In the SES, during the year March 1984 to March 1985, women experienced a growth of 2 persons, increasing their SES representation from 1.9 percent to 2.9 percent. Similarly, minority group employees increased by 1 employee, while their representation in the population rose from 3.9 percent to 4.4 percent.

### 3. CURRENT NRC EEO PROGRAMS

#### 3.1 Affirmative Employment Programs

Affirmative Employment Programs are personnel management programs which are implemented for the purpose of furthering EEO goals and objectives. The Office of Personnel Management (OPM) has established several specific affirmative action programs for use government-wide to focus personnel staffing and management attention on EEO related problems.

Under provisions of the Civil Service Reform Act (CSRA) of 1978, the regulatory responsibility for the development of policies for affirmative employment programs was delegated to OPM and the enforcement aspect was delegated to the Equal Employment Opportunity Commission (EEOC). Unless an exception has been granted, all covered Federal agencies and organizations must develop programs and policies consistent with those established by OPM.

##### 3.1.1 Federal Women's Program

The Federal Women's Program (FWP) is an affirmative employment program which places special emphasis on the employment concerns of women. The program was established by the Civil Service Commission in 1967 to address the underrepresentation and underutilization of women in the Federal government and was made an integral part of the Federal EEO program in 1969 for program emphasis and visibility. The FWP is the broadest in program responsibility of all the affirmative employment programs because it focuses, in particular, on employment matters as they affect women, the largest single constituent group. Provisions of all the other affirmative employment programs also apply to women. The FWP is managed by a designated Federal Women's Program Manager (FWPM) who reports to the Director, OSD/BU/CR, and is the principal advisor to NRC managers on employment concerns of women. A Federal Women's Program Advisory Committee (FWPAC) has been established to advise and assist the FWPM in addressing specific concerns of NRC women. In addition, there is an appointed collateral duty Federal Women's Program Coordinator (FWPC) in each region.

The FWPM participates in formal recruitment activities with the Division of O&P and in informal recruitment efforts of the various minority and women organizations; counsels managers/supervisors concerning strategies aimed at improving employment opportunities for women; counsels women regarding performance, training, and other career enhancing efforts; develops and implements plans and programs for women employees; and in conjunction with the Management Development and Training Staff (MDTS) and the Federal Women's Program Advisory Committee (FWPAC), conducts training and awareness programs opened to all NRC employees. To ensure that there is an Agency-wide, uniform FWP effort, the FWPM assists the Regional Administrators in implementing a viable FWP by assisting the Regional FWP Coordinators to develop and achieve their goals and objectives.

### 3.1.2 Federal Equal Opportunity Recruitment Program

The CSRA created the Federal Equal Opportunity Recruitment Program (FEORP) requiring Federal agencies to develop a recruitment plan to eliminate underrepresentation of minorities and women in certain covered positions. Although NRC positions are not among the covered positions, in 1981 the Agency voluntarily established a program which parallels FEORP and which is designed to eliminate underrepresentation in targeted categories of employment in NRC.

NRC makes yearly determinations of underrepresentation in accordance with EEOC criteria in the most populous professional occupations in NRC: General Engineering, GG-801; Nuclear Engineering, GG-840; Health Physics, GG-1306; Attorney, GG-905; and Security Administration, GG-080. Annual goals have been established since 1982 for each of the major offices planning to employ a significant number of staff in these occupations, and an annual assessment of progress towards meeting the goals is made in November of each year.

In 1982, the NRC advised the Equal Employment Opportunity Commission (EEOC) that the percentage of women and minority representation in the total professional civilian labor force could not be uniformly applied to engineering and scientific occupations. In 1984, in order to obtain more accurate data, NRC contracted with the U.S. Department of Energy and Oak Ridge Associated Universities to develop specific information pertaining to the representation of Engineers and Scientists in the workforce. This information was used to set goals in the engineering and scientific occupations for the FY-1985 Affirmative Action Plan, which were as follows:

<u>Occupation</u>	<u>Office</u>	<u>FY-1985 Goal</u>
Nuclear Engineer, GG-840	NRR	2 Asian Males
	IE	2 Asian Males
General Engineer, GG-801	NRR	1 Hispanic Male
	IE	1 Black Male
Security Administrator, GG-080	ADM	1 White Female
	NMSS	1 White Female
Attorney, GG-905	OGC	1 White Female
	ELD	2 White Females

External strategies have emphasized broadening and increasing the applicant pool from which selections into target positions are made. NRC has an aggressive recruitment advertising policy, and special emphasis has been given to advertising in publications and at professional meetings which are targeted towards minority and women's groups. In addition, the staff annually recruits at colleges and universities and participates in college job fairs;

here again emphasis is placed on those with a high quality engineering curriculum and a good representation of minority and women students. Finally, since its inception NRC has had an active Cooperative Education (Co-op) Program to increase the availability pool for engineering, scientific, and legal positions.

### 3.1.3 Programs for Veterans

Various statutes and Federal regulations recognize the particular employment problems many veterans face. NRC affirmative action programs directed toward veterans include focusing on the special needs of disabled veterans.

#### 3.1.3.1 Disabled Veteran Program

OPM requires all agencies to develop and have in place a current Disabled Veterans Affirmative Action Plan (DVAAP). The NRC DVAAP, was approved by the Office of Personnel Management (OPM) on January 11, 1985. As of May 31, 1985, the Agency employed 66 disabled veterans entitled to compensation for disability or who had been released from active duty because of disabilities.

#### 3.1.3.2 Vietnam Era Veterans

Although the competitive civil service has established several special hiring authorities to facilitate the entry of Vietnam era veterans into Federal service, NRC hires these veterans under its own excepted merit system. Approximately 292 staff members are Vietnam era veterans; these veterans account for about 8.7 percent of the total NRC staff.

#### 3.1.4 Handicapped Program

The NRC Affirmative Action Plan for Handicapped was updated and formally approved by the EDO on November 23, 1984.

During FY-1984 two new employees with targeted disabilities were hired. During FY-1985 (as of July 15, 1985), one new employee with such a disability had been hired. The number of NRC employees with targeted disabilities remained at 19 as of July 15, 1985.

During October and November of 1984, the NRC made serious efforts to upgrade and update the data base on handicapped employees. The Agency canvassed the total NRC work force twice within two months, encouraging all employees to complete and return Standard Form No. 256, "Self-Identification of Reportable Handicap." Approximately one-third of our employees responded, giving the Agency a more reliable data base on which to gauge future progress.

Recruitment efforts during FY-1985 included attending the Job Fair sponsored by the President's Commission for the Handicapped in May 1985. We have also commenced discussions with the State of Maryland's Vocational Rehabilitation Center with the objective of participating in their student volunteer service program.

### 3.1.5 Hispanic Employment Program

The Hispanic Employment Program (HEP) is an affirmative employment program which places special emphasis on the hiring, promotion, and retention of Hispanics. The program was established in 1970 as the Sixteen Point Program for Spanish Speaking Americans by Executive Order and was incorporated into the Federal Personnel System through FPM Letter 713-18 of January 23, 1973. In 1978, the program name was changed to the Hispanic Employment Program.

HEP focuses on the underrepresentation of Hispanic Americans in the Federal employment sector commensurate with their availability in the civilian labor force. Hispanic representation in the NRC workforce is about 1 percent.

HEP is guided and directed by OPM. Like other affirmative employment programs, its accomplishments are evaluated by the EEOC. In NRC, HEP is a collateral duty managed program; a Hispanic member of the OSD/CR staff is the HEP Manager (HEPM) for NRC; the HEPM attends meetings at OPM and conferences throughout the country where Hispanic issues and concerns are addressed. In addition, the HEPM participates in recruitment activities directed toward Hispanics and coordinates programs to increase awareness of Hispanic issues. Concerns for the representation and utilization of Hispanics are addressed in the "Report of Accomplishments" for Minorities and Women submitted annually to the EEOC.

### 3.1.6 Part-time Employment Program

The Federal Employees Part-time Career Employment Act of 1978 (P.L. 95-437) required Federal agencies to develop a program to provide part-time career employment opportunities to the maximum extent feasible. In 1979, NRC published proposed management directives for its program for comment, and the directives were published in final form in 1982 as part of NRC Manual Appendix 4108, Annex 2. As of May 11, 1985, a total of 152 permanent part-time staff members were employed by NRC.

Office Directors and Regional Administrators have established annual goals for part-time career employment in the Office/Region Staffing Plan prepared annually. Additionally, selecting officials are required to review each position under their supervision as it becomes vacant to determine the feasibility of filling it on a part-time career basis; and NRC regulations provide information concerning part-time employment for employees interested in changing from full-time to part-time status.

NRC has historically encouraged the use of part-time professional employees. In addition, the program has been of particular value in the regions, where part-time clericals are employed at many of the reactor sites to support Resident Inspectors. In most cases, these positions provide employment to persons, primarily women, who would otherwise be unable to enter the labor market.

### 3.2 Affirmative Action Recruitment, Hiring, and Placement

NRC is constantly working to increase the representation of minorities, women, and the handicapped in positions where underrepresentation of these groups may exist.

#### 3.2.1 Encouragement of Entry-Level Hiring

Both the affirmative action benefits and other advantages of entry-level hiring are recognized within the NRC. The importance of entry-level hiring was given strong emphasis by the EDO when on March 11, 1985, he directed that during the remainder of FY-1985 and for FY-1986, 25 percent of all NRC outside hires would be employed at the entry levels. This program is being carefully monitored by the Division of O&P; Regional Personnel Officers, and OSDBU/CR.

As of July 3, 1985, a total of 10 entry-level professional staff members had been hired during FY-1985. These included 5 white females and 2 male minority group members.

#### 3.2.2 Entry-Level Recruitment

Among the several protected groups, the availability of minorities and women in most professional occupations appears to be measurably greater among those at the beginning of their careers than among experienced applicants. For this reason, more highly qualified women and minorities have expressed interest in joining NRC at the entry level. To attract highly qualified women and minority applicants, the NRC is attempting to fill as many positions as possible at the entry level.

Since its inception, NRC has conducted an active college recruitment program. Emphasis is placed on colleges with a high quality engineering program and a good minority and female representation. The FY-1985 College Recruitment Program included 32 visits to college campuses. Ten of these visits were to predominately minority schools. These visits included participation in 18 minority or women campus job fairs.

The "Student Inventory" of applicants for the Agency's entry-level engineering and scientific positions has shown the positive results of our recruitment. Of the 409 entry-level applicants who have been entered into the Student Inventory between October 1, 1984 and July 12, 1985, approximately 34 percent (141 applicants) have been either women or members of minority groups.

These applicants included:

- 95 women (including 7 Asian, 11 Black, and 3 Hispanic women)
- 1 American Indian male
- 28 Asian males
- 15 Black males
- 2 Hispanic males
- 141 Total

### 3.2.3 Hiring Experienced Staff

Recruitment programs have been increasingly successful in soliciting applications from experienced engineers and scientists who are women and/or members of minority groups. Of the 258 experienced applicants who have been entered into the Headquarters Applicant Review System between October 1, 1984 and July 12, 1985, approximately 28 percent (73 applicants) have been either women or members of minority groups. These applicants included:

- 12 women (including 3 Asian women)
- 1 American Indian male
- 52 Asian males
- 5 Hispanic males
- 3 Black males
- 73 Total

In attempting to reach experienced workers, NRC regularly advertises in national technical magazines and journals and in predominantly minority and women's magazines with technical readership such as U.S. Black Engineer, Society of Women Engineers, and Hispanic Engineer. In addition to attending meetings of organizations such as the American Nuclear Society (ANS), NRC is either represented at or participates in technical society meetings conducted by minority and women's organizations.

### 3.2.4 Cooperative Education Program

The NRC Co-op Program is aimed primarily at individuals pursuing degrees in engineering and scientific disciplines of interest to NRC. There is an occasional requirement for Co-ops in non-technical disciplines. FTE for this program is centrally funded and managed by O&P.

The Co-op Program can provide NRC with minorities and women who can later become applicants for entry-level professional positions. In FY-1985 a total of 32 Co-ops were on NRC rolls. These included 15 women (including 3 minority women) and 3 minority men; thus, 18 (or 59 percent) of the Agency's Co-op employees were protected group members.

Six of the NRC Co-op employees graduated in FY-1985. Two accepted offers with the Agency, one declined, one went to military service and two pursued further goals in higher education.

### 3.2.5 Review of NRC Employment Practices

The majority of NRC employment practices which impact affirmative action recruitment or advancement are covered by NRCM 4108, "Employment," and NRCM 4130, "Position Evaluation and Pay Administration." Both these issuances have been revised within the past 3 years, and particular attention was paid during the revision process to ensure that none of the policies and practices created artificial barriers to the employment or advancement of minorities and women in NRC.

In addition, review of employment practices is an ongoing process. Input and feedback from EEO constituent groups, EEO Specialists, and employees have been helpful in this process. For example, the Labor-Management EEO Committee has continued to stress the advantages of entry-level recruitment over recruitment of experienced personnel in furthering affirmative action goals; the Committee has been an important influence in promoting these advantages among selecting officials and in locating minority candidates.

### 3.2.6 Qualifications Review and Analysis

During FY-1985, the Division of O&P has conducted a special review of the qualifications required in vacancy announcements for selected vacancies. The purpose of the review is to assure that qualifications are not unduly restrictive and are related to the duties of the vacant position. As of May 31, 1985, a total of 78 vacancy announcements had been reviewed. Thus far, as a result of these reviews, four vacancy announcements have been reposted to more correctly state qualifications requirements and in the interest of assuring that requirements are not too narrowly drawn.

### 3.3 Development and Utilization of NRC Staff

NRC training and development goals have been established to provide the maximum feasible amount of both technical and scientific and non-technical training to the broadest spectrum of NRC employees. NRC provides training to new employees entering on duty, current professional employees so that they can stay abreast of technological developments, all employees to maintain and improve their present job skills and knowledge, present and prospective supervisory, management, and executive personnel, and employees who need to be retrained as a result of reassignment.

#### 3.3.1 Training Programs

The Government Employees Training Act (P.L. 85-507) authorizes agencies to train employees to enable them to better perform their duties. The Management Development and Training Staff (MDTS), ADM, is responsible for administering the Government Employees Training Act at NRC. Consistent with definite needs which arise or are anticipated, employees are provided the opportunity to develop their knowledge, skills, and abilities to enhance their job performance and prepare themselves for future duties. Additionally, NRC provides opportunities for employees to acquire or update knowledge or skills necessary to maintain and improve NRC operations and to acquire knowledge or skills necessary to perform newly assigned responsibilities or responsibilities which will be assigned in the immediate future such as the next step on the career ladder of the employee's position.

Since 1977, NRC has conducted a formal Career Counseling Program which is now open to all employees. Participation is voluntary, and the objectives of the counseling are to provide: an increased awareness of skills, interests and aptitude; clarification of values and priorities; development of goal setting abilities; understanding of obstacles to career planning; and understanding the process of career decisionmaking. Over 1,000 NRC employees nationwide

increased awareness of skills, interests and aptitude; clarification of values and priorities; development of goal setting abilities; understanding of obstacles to career planning; and understanding the process of career decision making. Over 1,000 NRC employees nation-wide have attended this program.

Since 1979, NRC has sponsored training under the Certified Professional Secretary Program. Specifically targeted at Secretaries, the program requirements permitted an expansion of the definition of "job relevancy." Courses in fields such as accounting, para-legal training, and economics, which are normally unavailable, are available in a modified program administered in association with the National Association of Secretaries.

In order to ensure that all employees are aware of the training opportunities available to them, ADM issues a Guide to Training Opportunities (NUREG/BR-0017) to all employees. In addition, Training Announcements are distributed to all employees when new in-house training is made available. NRC managers are given detailed course descriptions and schedules in order to ensure wide dissemination of training information.

### 3.4 Complaint Receipt and Processing

There are well established, formal procedures for filing, receiving, and adjudicating complaints of discrimination. Throughout the process, discussion and informal problem resolution, where possible, are encouraged.

#### 3.4.1 The Complaint Process

NRC has 26 EEO Counselors who are appointed by the Director, OSDBU/CR. Sixteen are located in headquarters and two in each regional office. The counselor is the first stop for an employee or applicant for employment who believes he/she has been discriminated against in some aspect of his/her employment. The counselor has 21 calendar days to attempt to reach an informal resolution. If the final counseling interview is not completed in 21 days, the counselor must give written notice of the right to file a discrimination complaint any time up to 15 calendar days after the final interview.

If informal resolution fails, the employee or applicant may file a formal complaint with designated members of the OSDBU/CR staff. In addition, bargaining unit employees may file a grievance under the negotiated grievance procedure. NRC has developed an effective discrimination complaint investigation system based on a system of contractor based investigations and reports. This approach permits a full, independent review and

investigation of complaints by trained investigators, not regular employees of the agency. After completing the investigation, the investigator presents the Director, OSDBU/CR, with a fully documented report. The Director, OSDBU/CR, forwards one copy of the investigation report to the complainant and one copy to the designated EEO Officer for review, analysis, and an attempt at reaching an informal resolution. If an informal resolution is agreed upon, the terms of the agreement are reduced to writing, and the matter is closed.

If informal resolution fails, the EEO Officer issues a proposed disposition of the complaint based on the recommendation of the EEO Officer and the Director, OSDBU/CR. If the complainant rejects the proposed disposition, he or she is informed of his or her rights under the law, including the right to a hearing before an EEOC examiner, the right to appeal any agency decision made in connection with the complaint to the EEOC Office of Review and Appeals, and the right to file a civil action in a U.S. District Court after 180 calendar days from the date the initial complaint was filed.

#### 3.4.2 Analysis of Complaints

NRC policy is to maintain a positive environment for the EEO complaint process and to ensure that complainants and witnesses are free from reprisal or harassment. Since its inception in 1975, the NRC has had a total of 50 formal EEO complaints filed and accepted for processing under the regulations. Table 3.1 summarizes these complaints by the basis for each. Overall, complaints based on race factors lead the list, closely followed by those based on age. Only 19 complaints remained open as of May 31, 1985. Of the 31 complaints closed, 19 were withdrawn after resolution satisfactory to the employee in 13 cases, 7 were cancelled by NRC after a finding of no discrimination, 4 were rejected by the NRC, and 1 was cancelled by NRC for failure to prosecute. In addition, data on informal complaints and contacts with EEO Counselors is systematically collected and analyzed to spot potential problem areas and trends.

#### 3.5 EEO Training for NRC Staff

Employees, supervisors, and managers need to be aware of the impacts of past discrimination on members of protected groups and be sensitive to potential discriminatory actions. More important, supervisors and managers need to know how to integrate the principles of affirmative action into their personnel decisions. Accordingly, EEO and affirmative action training has been and will continue to be provided for NRC staff at all levels.

##### 3.5.1 Executive Training

Senior-level managers had not received formal EEO training as a group since 1976, although EEO topics had been included in many general management courses. This situation was addressed by means of two 1-day EEO training seminars conducted in May 1985.

Table 3.1 Formal EEO Complaints Filed at NRC  
1975 through June 30, 1985

Basis	Individual	Class	Total
Age	11	1	12
Sex	8	2	10
Race	16	2	18
Race & Sex	2	2	4
Age & Sex	2	0	2
Race, Color & National Origin	1	0	1
Harassment	3	0	3
Totals	43	7	50

Source: OSDBU/CR

### 3.5.2 Employee Orientation and Awareness

Semiannually, MDTs conducts orientation training for all new employees. Representatives from selected NRC offices, including OSDBU/CR, describe their primary functions, and in the case of OSDBU/CR, their EEO program responsibility. The OSDBU/CR supports various functions of special emphasis groups and committees, such as the Asian/Pacific American Heritage Week; Black History Month; and the Hispanic Heritage Week. Each year OSDBU/CR makes funds available to each special emphasis group for use on special activities as needed.

### 3.6 EEO Planning, Implementation, and Review

NRC has a centralized system for EEO planning. However, program implementation is carried out by several EDO staff offices working with individual headquarters offices and regions.

#### 3.6.1 Review of Program Planning

Within NRC, OSDBU/CR has the principal responsibility for EEO program planning. The objective of the EEO planning process is to provide NRC with a systematic approach for establishing affirmative action plans and goals. In turn, these plans are designed to be integrated into the ongoing management and personnel process.

#### 3.6.2 Program Implementation

Once EEO plans and affirmative action goals are established and approved by the Commission and the EDO, staff offices such as OSDBU/CR and ADM are responsible for developing specific programs and activities for achieving the goals and then monitoring achievement of those goals. Ultimately, individual managers and supervisors are the focus for the implementation of NRC EEO and affirmative action programs through their day-to-day personnel decisions.

#### 3.6.3 Reporting Responsibilities

O&P provides the basic personnel data needed by OSDBU/CR, ADM, the EDO, and the Commission to prepare, operate, monitor and evaluate EEO programs. In turn, OSDBU/CR has the principal responsibility for analyzing data and submitting reports.

#### 3.6.4 Reports to NRC Management

Based on data from O&P, OSDBU/CR prepares information to provide NRC management with an assessment of the effectiveness of EEO and affirmative action initiatives and to show long-term changes in EEO conditions. Reports to NRC management are usually made in conjunction with the preparation of formal reports to the EEOC and other agencies rather than on a recurring internal cycle.

### 3.6.5 Reports to Other Agencies

All Federal agencies are required to prepare and submit to the EEOC a yearly Affirmative Action Plan containing goals and accomplishments. In addition to this report, NRC also prepares and submits program-specific reports on the various affirmative employment programs such as the Disabled Veterans Affirmative Action Plan (DVAAP) for disabled veterans.

### 3.6.6 Status of Reporting Systems

NRC analysts and managers use a combination of automated and manual systems to record EEO related data.

#### 3.6.6.1 Automated Personnel System

The Automated Personnel System (APS) maintained by the Division of Organization and Personnel (O&P) is the principal source of EEO data for the NRC. Identification of minority group membership and handicapped status is based on employee self-identification. Data on sex and age is based on O&P review of official employment records. The system builds a transaction history file which provides the data from which analysis of employment trends can be undertaken. In addition, the system produces a number of pre-formatted reports analyzing the composition of the NRC workforce.

The current APS is an excellent system for capturing and storing data required for EEO analyses; during the period October 1, 1984 through July 31, 1985, the Division of O&P produced 62 EEO-related reports. The availability of micro-computers now makes it possible to transfer, manipulate, and format this data.

#### 3.6.6.2 Manual Reporting Systems

Labor-intensive manual systems are now used to collect selected data on applicants for NRC employment and to track them through the employment process. A significant percentage of training and development data is maintained manually.

### 3.7 Management Accountability for EEO Accomplishments

Individual supervisors and managers have the ultimate responsibility for the success or failure of achieving EEO program objectives, and will be held accountable for performance in meeting the Agency's EEO policies and objectives.

#### 3.7.1 Authority and Accountability

The head of each agency, or his designee, has the responsibility for establishing, maintaining, and carrying out a continuing affirmative action program. After the proposed hiring goals and other

affirmative actions are approved by the Chairman, they are formally transmitted to Office Directors and Regional Administrators by the EDO. OSDBU/CR then provides the EDO and the Chairman with assessments of management EEO activity based on reports submitted by individual offices and review of data submitted by O&P.

### 3.7.2 EEO and the Performance Appraisal Process

The EEO accomplishment report submitted annually by Office Directors and Regional Administrators to OSDBU/CR is analyzed in order to provide the EDO and the Chairman information regarding the performance of managers and supervisors in achieving their assigned goals, in addition, the Director, OSDBU/CR has been appointed as a non-voting, ex officio, long-term member of the SES Performance Review Board.

Under current NRC performance appraisal systems, both SES and non-SES managers and supervisors must be rated on their EEO performance as a part of their overall management effectiveness. Rating officials evaluate EEO performance as part of the appraisal process. While both OSDBU/CR and ADM now provide input to the performance rating process for Office Directors and Regional Administrators, the EEO effectiveness of lower-level managers and supervisors is generally not assessed as systematically.

### 3.7.3 EEO as a Factor in Recognition and Awards

The NRC Equal Employment Opportunity Award is presented to employees for outstanding achievements or contributions in furtherance of the NRC EEO Program. The award is approved by the EDO and presented during the Annual Incentive Awards Program. Since 1977, nine, or 45 percent, of these awards have been to supervisors and managers in recognition of their EEO accomplishments.

#### 4. ASSESSING THE FY-1985 NRC EEO PLAN

The Office of Small and Disadvantaged Business Utilization/Civil Rights has the lead for monitoring the implementation and assessing and reporting the accomplishments under NRC's FY-1985 Consolidated EEO Program Plan. The following sections review the actions taken by the organizations having responsibility for the implementation of actions under the FY-1985 Consolidated EEO Program Plan.

##### 4.1 Division of Organization and Personnel

The Federal Equal Opportunity Recruitment Plan (FEORP) and an Affirmative Action Plan for the Handicapped were completed by O&P and approved by the EDO on October 23, 1984.

A Disabled Veterans Affirmative Action Plan was prepared by O&P and approved by the Office of Personnel Management (OPM) on October 23, 1984.

Thirty + colleges and thirteen job fairs or conferences had been visited by March 4, 1985, including six events sponsored by minority or women's organizations.

FY-1985 vacancy forecast for professional occupations with 100 or more employees were made and enlarged to include three additional professional occupations with 50 or more employees.

Disabled veteran employees were identified.

An announcement concerning the benefits of part-time employment was published by the Director, Division of Organization & Personnel.

A poll pertaining to entry-level hires in FY-1985 was taken.

A system for following up on students contacted by NRC was devised and a transmittal was published providing guidelines for recruiters.

O&P has aimed to review 5 percent of all NRC positions during FY-1985. By the third quarter of FY-1985, 346 positions were reviewed.

O&P is currently conducting an impact analysis of qualification requirements by having an O&P Review Board analyze vacancy announcements.

Individual memos were sent to employees, inviting educational updates in order to conduct a review of the APS data base regarding education. Approximately 3000 responses were received and the data base has been updated.

In order to update the handicap data, announcements were sent to all employees inviting updates. Approximately 1200 responses were received and data input has been completed.

EEO related matters were included in the Summer and Fall issues of "News, Reviews & Comments."

#### 4.2 OFFICE OF SMALL AND DISADVANTAGED BUSINESS UTILIZATION/CIVIL RIGHTS

##### 4.2.1 Civil Rights Program

Quarterly meetings with Headquarters EEO Counselors were started successfully.

EEO Counselors provided quarterly statistical reports.

EEOC official made presentation to EEO Counselors on "Handicap Discrimination."

Several one-day EEO seminars for Office Directors and Regional Administrators were conducted at NRC by USDA Graduate School instructors.

Meeting with EEOC personnel was held for discussing methods to improve the discrimination complaint process and to obtain updated information on EEO counseling and discrimination complaints.

All complainants with active discrimination complaints were contacted in order to discuss the status of their cases.

In order to obtain accurate information on the availability of women and minorities in the engineering and scientific Civilian Labor Force, a contract was awarded to the U.S. Department of Energy and Oak Ridge Associated Universities who developed the data.

Underrepresentation determinations were prepared for professional occupations with 50 or more incumbents.

Hiring goals for minorities and women were established and transmitted to Office Directors and Regional Administrators.

An Hispanic Employment Program Manager and Black Affairs Coordinator were appointed on a collateral basis.

The FY-1985 Affirmative Action Plan was prepared and submitted to the EEOC.

##### 4.2.2 Federal Women's Program

In conjunction with MDTs and the Regional FWP Coordinators, the FWP conducted Individual Development Plan (IDP) seminars in the Washington Headquarters and three Regional Offices.

The FWP Manager met with the Regional Administrators and Office Directors and their staff members, providing guidance and assistance aimed at improving employment opportunities for NRC women.

In conjunction with the FWPAC, the FWP sponsored awareness programs and conducted Lunch and Learn programs for all employees addressing such issues as SF-171 Preparation, Networking, Mentoring, Why Should I Hire You, Interviewing Techniques, A Man's View of the Women's Program, Time and Stress Management, and more.

The FWP developed, published, and provided FWP brochures to O&P for use in the orientation packet. These brochures were distributed to all regions and are given to all new women employees.

The FWPM prepared seven articles pertaining to women in the NRC News, Reviews, and Comments Newsletter.

The Agency hired two women for SES positions and several others for supervisory and managerial jobs.

Regional FWPCs were made members of the EEO Advisory Committee in their regions and provided input to their regions operating plan.

Career counseling for women was made a focus by the Regional FWPC of those receiving this assistance, the majority were women. In Region II this program was reactivated and it was extended in Region V.

The FWP conducted exit interviews with cooperating women leaving NRC.

The FWP assisted O&P in recruitment activities by personally participating in job fairs, recommending participation and suggesting recruiting areas that could produce more minorities and women.

The FWP provided individual counseling to women concerning child care, career planning, performance, and other issues affecting their employment.

The FWP was also instrumental in informal resolution of EEO complaints.

#### 4.3 Upward Mobility

NRC has established a revised Upward Mobility Program (UMP) to provide developmental opportunities to lower-level employees. This program was published on November 9, 1984, as Part VI of NRC Appendix 4150, Employee Development and Training. The program focuses on selection of those employees who show potential to function effectively in professional or paraprofessional positions with greater growth potential.

Thus far during FY-1985 six upward mobility positions have been announced throughout the Agency. These are:

- Contracts Management Trainee, GG-5/7 (ADM)
- Personnel Management Specialist, GG-5/7 (RII)
- Inspection Assistant, GG-6/7 (RII)
- Administrative Aide, GG-7 (NRR)
- Emergency Preparedness Specialist, GG-7 (RIII)
- Records Holding Specialist, GG-5/7 (ADM)

Additional upward mobility vacancies are anticipated as FY-1986 office and regional staffing plans are developed, approved, and implemented.

#### 4.4 Goals Obtained

As of July 31, 1985, our success in meeting FY-1985 goals was as shown below:

<u>Occupation</u>	<u>Office</u>	<u>FY-85 Goals</u>	<u>Actual Hires Meeting Goals</u>	<u>Total Other Hires In Targeted Series</u>
Nuclear Engineer, GG-840	NRR IE	2 Asian Males 2 Asian Males	2 Asian Males 1 Asian Male	1 3
General Engineer, GG-801	NRR IE	1 Hispanic Male 1 Black Male	None None	6 8
Security Administrator GG-080	ADM NMSS	1 White Female 1 White Female	1 White Female 1 White/Hispanic Female	None 3
Attorney, GG-905	OGC ELD	1 White Female 2 White Females	None None	2 1

## 5. FY-1986 NRC EEO PROGRAM PLAN

### 5.1 Overview

NRC has a wide range of EEO and affirmative action programs. These programs are augmented by individual offices and managers providing opportunities for staff development. Continued evaluation of these activities is one aspect of the FY-1986 Plan. The FY-1986 Plan also includes program elements that are intended to assure greater accountability by NRC managers for EEO performance.

NRC has the necessary basic structure in place to achieve EEO program goals. The activities themselves are result-oriented and systematically monitored against specific ambitious, yet achievable, objectives. Managers and supervisors will continue to be made aware of their EEO responsibilities, Plan accomplishments, and to be held accountable for proper implementation of their EEO responsibilities.

In FY-1986, NRC staff will continue to develop and implement the full range of affirmative employment programs now in place. College recruiting will continue at a high level and will be focused on colleges and universities which are productive of entry-level protected group applicants. Job related training offering potential for personal and professional development will continue to be offered and approved as funds permit.

During FY-1986, NRC will continue to place more attention on developing and utilizing the skills of its present staff as a proven means of achieving EEO and affirmative action goals;

Operation of an Upward Mobility Program will be an important part of the FY-1986 EEO Program Plan. The upward mobility program for FY-1986 will be increased from 6 to a goal of 15 participants, as long as this can be accomplished within budget constraints.

NRC will continue to design programs to increase opportunities for staff development consistent with long-term NRC mission objectives and funding availability;

Qualifications analysis will continue to be examined to ensure that only job related requirements are used in merit selections. The Division of O&P will continue to conduct a review of each vacancy before an announcement is issued to ensure that the qualifications requirements fit what is needed to do the job and are stated in a way that enhances opportunities to recruit from available pools of special emphasis candidates. O&P will report to the Commission on whether their reviews disclose a pattern of unduly restrictive qualifications requirements in the Agency as a whole or in individual program offices;

Regional EEO Coordinators advise Regional Administrators on EEO and affirmative action matters;

EEO program evaluation and reporting will be enhanced in FY 1986; individual projects and activities will be tracked throughout the year, and accomplishments will be judged against planned outcomes in quarterly management reviews conducted for the Executive Director for Operations (EDO) and semiannual briefings to the Commission;

Emphasis will be placed on communicating EEO and affirmative action goals to top agency managers and working with these managers to formulate realistic EEO goals for each headquarters office and region;

EEO effectiveness will be a more visible factor in assessing the overall management performance of top NRC managers;

NRC staff will continue to develop and implement the affirmative employment programs now in place;

College recruiting will continue to emphasize those colleges and universities with significant minority and women student populations;

Training offering potential for personal and professional development will continue to be offered with new emphasis on developmental opportunities;

EEO training for new supervisors and managers will be continued in FY 1986;

Employee awareness programs such as Black History Month, Hispanic Heritage Week, and Women's Equality Day will be supported;

The Commission will hold semiannual meetings on the EEO program. The Commission will hear from the OSDBU/CR, the EDO, and EEO Advisory Committees at these meetings. The EEO Advisory Committees will have the responsibility to report periodically to the EDO on EEO policies, programs and progress and during the semiannual briefings to the Commission directly.

In order to present a professional analysis regarding Agency EEO policies and procedures, the briefing should focus on presentations by the Directors of OSDBU/CR and ADM who are tasked with relevant aspects of the EEO program. These Office Directors will reflect input from all committees in formulating the content of the briefing.

Although formal complaint processing is not a major factor in the NRC EEO program, EEO Counselors will continue to be used to identify potential problems to NRC management before employees seek counseling. Accordingly, in FY-1986 activities are planned to make use of the insights of EEO Counselors while enhancing their status.

Individual projects and activities will be tracked throughout the year, and accomplishments will be judged against planned outcomes in quarterly management reviews conducted for the Executive Director for Operations and biannual reports to the Commission.

The FY-1986 Consolidated EEO Program Plan will place emphasis on communicating EEO and affirmative action goals to top Agency managers, working with these managers to formulate realistic EEO programs for their offices, and then judging results using performance appraisal mechanisms.

## 5.2 Federal Women's Program

The Federal Women's Program (FWP) in FY-1986 will continue to provide a system of communication between the Regions and Headquarters, and to provide timely feedback to managers and supervisors on the FWP.

In coordination with the Management Development and Training Staff (MDTS), ADM, the FWPM will continue to encourage NRC women to prepare Individual Development Plans (IDP). The FWP will continue to assist MDTS in implementing and evaluating the Upward Mobility Program. The FWPM will be available to counsel women employees in the program and will assess its overall impact on women throughout FY-1986.

The FWP and the FWPAC will continue to sponsor awareness programs for all employees and provide assistance and advise to management on all matters concerning employment of women in NRC. A continuous assessment of the way NRC does business (both in-house) and its impact on EEO for women will be the primary focus of the FWP for FY-1986.

## 5.3 Federal Equal Opportunity Recruitment Program

The NRC Federal Equal Opportunity Recruitment Program (FEORP) program provides a framework for determining those occupations in NRC which have underrepresentation of minorities and women when compared to the same occupations in the civilian labor force; and for setting goals to overcome underrepresentation.

### 5.3.1 Underrepresentation Determinations

Equal Employment Opportunity Commission (EEOC) guidelines currently require using Civilian Labor Force (CLF) data supplied by OPM for underrepresentation determinations. CLF data may be misleading with reference to NRC mainstream engineering and scientific positions for the following reasons: the data reports minority and women representation in all professional occupations combined, which is widely at variance with their representation in NRC mainstream occupations; the data includes non-citizens, who can only be hired by NRC under very unusual circumstances; the data includes all persons age 16 or older while persons under age 22 are rarely qualified for NRC mainstream occupations. In FY 1985, NRC contracted with the U.S. Department of Energy and Oak Ridge Associated Universities to develop specific information pertaining to the representation of Engineers and Scientists in the workforce. This information was used to make the underrepresentation determinations for FY-1985 and will be used in subsequent determinations. This project was managed by the Office of Small and Disadvantaged Business Utilization/Civil Rights (OSDBU/CR) with coordination and support from O&P.

Following completion of the CLF analysis, NRC will continue to make revised determinations of underrepresentation for all professional occupations in NRC with more than 50 employees for which hiring is anticipated in FY-1986. Because these occupations represent the most populous occupations in NRC, and because they also provide generally good opportunities for advancement and for movement into supervisory and management positions, it is important that underrepresentation in these occupations be the focus for future affirmative action programs.

#### 5.3.2 Vacancy Forecasts for NRC's Most Populous Occupations

O&P, Regional Personnel Officers, and line managers will forecast FY-1986 vacancies to be filled in those professional occupational groups with more than 50 NRC employees. The vacancy forecasts will allow realistic affirmative action hiring and internal placement goals to be set. The forecasts will be completed by October 31, 1985 by O&P in coordination with all headquarters offices and the Regional Offices.

#### 5.3.3 Hiring Goals for Minorities and Women

Based on vacancy forecasts, and anticipated recruitment activity, OSD/CR staff will set goals for the hiring and placement of minorities and women in target occupations. Goals will be set not later than one month after the NRC-based underrepresentation determinations have been made and priorities assigned, or not later than November 30, 1985. OSD/CR, with assistance from O&P, will take the lead in assisting individual offices and regions in accomplishing their FY 1986 hiring and placement goals.

#### 5.3.4 Programs for Veterans

During FY-1986 NRC will continue affirmative action efforts aimed at hiring veterans. Preference for veterans will be enforced and recruitment liaison with veterans' groups will be maintained.

#### 5.3.5 Handicapped Program

The O&P staff and Regional Personnel Officers will maintain and refine contacts with local and state vocational rehabilitation sources.

The Employment Programs Section, O&P, in reviewing proposed personnel policies and procedures, will ensure that they do not create barriers for handicapped individuals or discourage the handicapped from applying for employment. This will be an ongoing activity throughout the fiscal year as new policies and procedures are proposed. Potential problems and barriers will be discussed with the Policy and Program Development Branch, O&P.

#### 5.3.6 Hispanic Employment Program

As in prior years, an all-employee bulletin describing Hispanic Heritage Week will be prepared and distributed. In addition, Headquarters employees will be encouraged by the HEPM to join in the observance of Hispanic Heritage Week.

During FY 1986 the Hispanic Employment Program Manager (HEPM) will accompany O&P staff on recruiting trips to colleges and universities with clusters of Hispanic students. The objective is to solicit applications for employment from Hispanics in order to increase the representation of Hispanic professionals in the applicant pool.

#### 5.3.7 Part-time Employment Program

Part-time career employment is often particularly attractive to women, older, or handicapped individuals, students, and parents with family responsibilities.

##### 5.3.7.1 Identification of Part-time Career Positions for FY-1986

Through their staffing plans, Office Directors and Regional Administrators identify positions to be utilized during the fiscal year for part-time career employment. Part-time positions are identified both at the time of original submission of the staffing plan and during the year as plans are modified. Position descriptions for part-time jobs are furnished at the time when recruitment is started.

Again in FY-1986, O&P will publish an NRC announcement for all employees explaining the benefits of part-time employment and encouraging both employees and supervisors to consider this alternative. O&P will include the number of part-time positions in quarterly EEO program reviews for the EDO.

#### 5.4 Affirmative Action Recruitment, Hiring, and Placement

Affirmative action is an integral part of personnel management and cannot be separated from day-to-day recruitment efforts. In FY-1986, special emphasis will be placed on entry-level hiring.

##### 5.4.1 Cooperative Education Program

The Cooperative Education Program will be continued during FY-1986 with a total of 6 FTE staff years devoted to Co-ops. The Agency anticipates that 12-14 students will be employed under this program during the fiscal year.

##### 5.4.1.2 Campus Recruitment

Effective, aggressive recruitment on college campuses is a critical prerequisite to entry-level hiring of minorities and women. This will include initial pre-visit contacts with college placement offices to provide them with information about NRC and Federal employment and follow-up contacts after recruitment visits. NRC staff members who graduated from schools to be visited will be used as resource personnel for both pre-visit and follow-up contacts. During FY-1986, the NRC on-campus team will include a Personnel Specialist and one or two technical staff members; when feasible, OSD/BU/CR staff will join the team. O&P will use a tracking system to ensure follow-up through the schools to students contacted during the visits.

NRC will visit approximately 28 to 32 colleges and universities during the 1985-1986 school year. The objective is to increase the number of minorities and women interviewed. The Staffing and Position Evaluation Branch, O&P, will be responsible for managing this activity with support from individual headquarters offices and regions.

#### 5.4.1.3 Job Fairs

Participation in minority and women job fairs broadens the applicant pool and specifically increases the number of minority and women applicants for NRC positions. The NRC team at job fairs will consist of a Personnel Specialist and one or two technical staff. NRC will participate in approximately 10-15 minority and women job fairs throughout FY-1986 to solicit completed applications. The Staffing and Position Evaluation Branch, O&P, will manage this program with the assistance of staff from individual headquarters offices and regions.

#### 5.4.2 Advertisement

NRC will continue to advertise in national technical magazines and journals such as Nuclear News and Power and in predominantly minority and women's magazines with a technical readership base such as Society of Women Engineers, Hispanic Engineer, and U.S. Black Engineer. Minority newspapers having sufficient circulation to attract qualified applicants will also be used as advertising sources. NRC will also continue to advertise in meeting and conference programs published by minority and women's engineering and technical organizations.

It is difficult to capture data on how many applicants submit resumes to NRC as a direct result of such advertising; however, experience shows that an overall increase is apparent when such advertising is regularly used.

#### 5.4.2.1 Attendance at Technical Society Meetings

As in previous years, NRC staff will attend meetings of groups such as the American Nuclear Society (ANS) and the Health Physics Society. In addition, NRC will be represented, and participate as appropriate, at four technical society meetings conducted by minority and women's organizations in FY-1986. The recruiting team at all meetings will include a technical staff member and will make initial contact and conduct interviews. The objective will be to receive more applications from attendees who are members of protected groups.

The Staffing and Position Evaluation Branch, O&P, will manage this activity with participation from technical offices and regions.

#### 5.4.3 Job Analysis and Restructuring

Job analysis and restructuring will be used to broaden occupational designations and qualification requirements. Such changes broaden the applicant pool and allow for a greater number of candidates to be considered for positions. NRC has expanded occupational series coverage in the past, most notably for Project Manager positions in NRR and NMSS and Inspector positions in the regions by using more general occupational series.

#### 5.4.3.1 Long-Range Cyclic Review

The Staffing and Position Evaluation Branch, O&P, will continue its review of 5 percent of all NRC positions during FY-1986. Special emphasis will be placed on identifying opportunities for job restructuring which would enlarge the available talent pool to include more minorities and women.

Throughout FY-1986, the Staffing and Position Evaluation Branch, O&P, and Regional Personnel Officers will review each recruitment request for potential job changes in order to expand series coverage.

#### 5.5 Development and Utilization of NRC Staff

Employee development has a critical role in aiding NRC to attract, develop, and retain capable employees. NRC recognizes the key role that training and development plays in its EEO and affirmative action effort. Training and development programs and activities will be emphasized again in FY-1986 to achieve EEO and affirmative action goals.

The Commission intends to take the broadest permissible interpretation of the Commission's authority to provide additional training to qualify employees for advancement into other career paths within the Agency. Further, in providing training, the training office will apply the broadest interpretation of the Commission's authority to provide additional training to qualify employees for advancement into other career paths within the Agency.

##### 5.5.1 Upward Mobility

NRC has established a revised Upward Mobility Program (UMP) to provide developmental opportunities to lower-level employees which will eventually qualify participants for administrative or technical positions within the Agency. A goal of 15 upward mobility positions are anticipated during FY-1986 depending on budget constraints.

The Upward Mobility Program envisions progression through paraprofessional towards a professional towards a professional career; however, each upward mobility position can provide assistance in making only a limited number of steps on that career path. Each upward mobility position is established with a target grade to which the employee selected can advance after training and on-the-job experience. Licensing Assistant positions, for example, do not offer career potential beyond the GG-11 level. Jobs that are paraprofessional in nature generally can not offer a direct bridge to professional engineering or scientific positions with the rigorous academic qualifications, because the credential requirement for these professional positions can not be overridden. It is up to the individual to provide him/herself with the necessary credentials via continuing education or training to move into these kinds of professional slots. The Upward Mobility Program is intended to offer assistance in this process but it is not intended to supplant required credentials.

The managers of the Upward Mobility Program will work with the Training Programs to define the potential of each upward mobility position for career advancement. The limits of each upward mobility program career ladder will

be delineated. The possibility of forward linkages with relevant higher level career ladder will be detailed. The credentials required for progressing beyond the current ladder limit in related fields will also be identified. The Training Office will provide as much training and counseling assistance as possible to upward mobility program participants to enable each to realize his/her upward mobility program and career goals.

The EDO will review what grade caps exist for the 15 Upward Mobility positions to make sure that they meet the overall upward mobility objectives. A significant number of the Upwardly Mobile positions should be in disciplines which, with NRC-sponsored training, can lead up career ladders to genuinely professional positions.

A revised NRCM 4150, Part VI, Upward Mobility Program, has been approved and publicized to all NRC employees.

#### 5.5.2<sup>2</sup> Increasing the Use of Individual Development Plans

An Individual Development Plan (IDP) is an individually tailored plan established between a supervisor and an employee outlining the employee's short-term and long-range career objectives and the means, such as formal training, on-the-job training (OJT), or developmental assignments, for achieving these objectives within certain time frames. The purpose of an IDP is to increase the current proficiency, development, and progression of the employee through a systematic training plan. An IDP provides the best means of planning a developmental program which both satisfies Agency needs and concentrates on an individual's total developmental requirements. The IDP documents the reasons for engaging in developmental activities; indicates what developmental objectives are to be achieved; lists specific activities which are to occur; and outlines the time frame for implementing the plan.

NRC is encouraging every employee to develop both short-term and long-range development goals and to pursue self-development activities. Emphasis has been added by the EDO in his Annual Program Guidance. However, the fact that training and development activities are identified on an IDP cannot be seen as either formal NRC approval or authorization to undertake them.

Implementation of the plan must be in accordance with the provisions established in Manual Chapter 4150 "Employee Development and Training." Simply including a developmental activity on an IDP does not validate the legality and authority for the activity; it must still pass the tests imposed by law and regulations.

Preparation of IDP's is encouraged, but optional; except they are required for employees in formal training and development programs such as UMP or the NRC Intern Program. MDTs has developed and published an employee guide for individual development planning which was issued to all employees; it also included specific information on designing developmental assignments. IDP's are most effective when developed in discussion between supervisor and employee, and their contents are related to improved performance. The counseling and performance appraisal can be conducted at the same time. When reminding headquarters offices and regions of the timetable for submitting appraisals, O&P will note the desirability of concurrently preparing IDP's.

### 5.5.3 Supervisory and Management Development for NRC Employees

NRC has extensive supervisory and management development programs and activities for its current staff members. Supervisory development training has been made mandatory for all new supervisors and soon to be supervisors. The programs utilize a systematic approach to developing non-supervisory and supervisory personnel and are based upon current and long-term human resource needs of the Agency. Through these programs NRC managers and supervisors receive training in personnel management and development responsibilities, including their EEO and affirmative action responsibilities. They also provide the pathway for upward movement through the organizational structure.

#### 5.5.3.1 Pre-supervisory Orientation Program

Most minority and women employees are not supervisors or managers. Many of these employees, as well as other non-supervisory NRC staff, have expressed a desire to pursue career goals leading to a supervisory position. In recognition of the need for orienting NRC employees about supervisory career opportunities, a "Pre-Supervisory Orientation Program" (P-SOP) was developed in FY-1983. The objectives of the program are to provide career guidance and orientation toward an understanding of the supervisory role within NRC. The P-SOP is open to all non-supervisory employees by their self-initiation and consists of two parts: Part I is a self-study correspondence course designed to provide an appreciation of the supervisory role; and Part II is a group orientation for those completing Part I and designed to clarify individual career goals.

The P-SOP had 365 participants in FY-1983. In the FY-1984 program there were 225 participants. During FY-1985, 225 individuals were enrolled. MDTs announced the P-SOP in June 1985. One hundred and fifty-one employees applied and were enrolled in the third session.

#### 5.5.3.2 Supervisory Development

First-level and second-level supervisors are an integral part of the NRC management team. Emphasis on the training of supervisors is important since they are the ones who implement policies at the working level and have the most immediate contact with the employees who produce the organization's output.

##### 5.5.3.2.1 Supervising Human Resources Course

The Supervising Human Resources Course (SHR) is the core course for first-level and second-level supervisors. The content of this five-day program includes such aspects of supervision as role definition, planning, leadership style identification, motivation techniques, communications and interpersonal relations techniques. This course was initiated in FY 1983. The SHR course will be offered several times in FY-1986 as part of the mandatory Supervisory Development Program.

In soliciting nominations, MDTs will ensure that supervisors in protected groups are made aware of the availability of this course through the issuance of an "All Employees" announcement in conjunction with the schedule of in-house courses.

#### 5.5.3.2.2 NRC Management Workshop

The Management Workshop has been redesigned as a follow-up activity to the SHR course. The Workshop enables managers to evaluate and analyze their current managerial effectiveness and practices. It is suggested participants complete the Workshop six to twelve months after the SHR course. The Management Workshop will again be offered twice in FY-1986. In soliciting nominations, MDTs will ensure that supervisors in protected groups are made aware of the availability of this course through promulgation of an "All Employees" announcement issued concurrently with the in-house course schedule.

#### 5.5.3.2.3 Continuing Supervisory Education

Supervisors have a responsibility to continue their development and performance improvement through training courses as well as on-the-job experiences. Continuing education courses may include those provided by OPM at the Executive Seminar Centers and other selected government and non-government training and development experiences.

NRC will offer specific continuing educational development programs at the OPM Executive Seminar Centers and at other institutions in FY-1986. Approximately 40 spaces are planned at OPM Executive Seminar Centers. Complete schedule and space allocation listing will be published by OPM in August 1985, at which time MDTs will advise agency nominees of their acceptance into the program. Prior to developing the final list of those who will attend in FY-1986, MDTs will review the total list of nominees to ensure appropriate representation of protected groups.

#### 5.5.3.3 Executive Leadership Program

This 1984-85 program was established by the Office of Personnel Management (OPM) for women employees GG-9 through GG-12 to create a source of capable and trained women to enter supervisory and management positions. NRC has monitored the program throughout its first year and has found it feasible and desirable to conduct a similar, limited, in-house NRC program in FY-1986. The scope of the in-house program will be expanded to include both men and women employees, GG-9 through GG-13, to enable more employees to apply.

#### 5.5.3.4 SES Candidate Development Program

The purpose of this program is to develop executive competencies in Agency employees with high potential to become managers in order to create a pool of employees who are SES-certified and available to fill newly created or vacated SES positions. A number of women and minorities have been selected to

participate in the program as a precursor to entering the SES. Based upon a forecast of SES vacancies and the number of employees in the SES pool, the Agency solicits application for the SES Candidate Development Program from employees in grades GG-14 and GG-15. Employees nominate themselves and participants are selected by a panel appointed by the Chair, Executive Resources Board. The program is part-time, participants remain in their current jobs, and complete an approved IDP over a 2-year period. The Program content and procedures are directed by OPM rules and regulations.

NRC has commenced a third SES Candidate Development Program during CY 1985-87; and 15 employees were selected.

#### 5.5.4 Administrative/Clerical/Assistant Job Development

Federal statutes and regulations permit the head of an agency full latitude to provide programs directed at improving individual performance for mission accomplishment, at improving organizational effectiveness, and at complying with statutes and Executive Orders. In administering the NRC training and development program, EFO responsibilities suggest the need to establish a broad development program targeted generally at the lower-grade levels in the administrative, clerical, and "assistant" job series, where the career ladder progression is more limited in comparison to employees in technical job series. By instituting such a program, the agency should be able to broaden the spectrum of available training vis-a-vis the strict job relevancy restrictions.

An Administrative/Clerical/Assistant Development Program was developed in FY-1985 by MDTS. The program includes three separate components: continuation of the Certified Professional Secretary Program; a Computer Science Development Program; and an Administrative Skills Enhancement Program.

Application for entry into any one of these programs is open to all NRC employees who meet established written eligibility criteria. Career Counseling will continue to provide for career orientation development and a new in-house "NRC and Its Environment" course, in the development stage will provide for NRC orientation.

MDTS submitted to EDO in May 1985, a fully developed concept of the three programs under this heading. MDTS intends to implement the programs in FY-1986.

#### 5.5.5 Secretarial and Clerical Development Program

Secretarial and clerical employees are generally subject to heavy workload pressures that normally lead to restrictions on time available to obtain training or advance their career prospects. MDTS has created a more structured, cohesive, and beneficial program of development of important skills for secretarial and clerical employees. This program makes available the necessary information on training

opportunities and, wherein required, the actual training to all secretarial and clerical employees. It parallels the Secretarial/Clerical/Assistant Development Program and may ultimately be incorporated into the broader program.

The responses to the Development and Training Needs Survey for NRC secretarial and clerical staff which was distributed in May 1984 were analyzed by the USDA, Graduate School and a development program was outlined. Many of the needs are to be satisfied from off-the-shelf courses. Seven courses were designed and implemented to meet specific individual needs and others will continue to be developed as needs change.

## 5.6 Complaint Receipt and Processing

Since 1975, 50 formal EEO complaints have been filed at NRC. While this relatively small number of complaints has permitted the staff to ensure strict compliance with EEOC and NRC deadlines and regulations, a broad perspective on complaints will continue in FY-1986. More effective networking of EEO officials has permitted management to gain a better understanding of the underlying causes of complaints and spot significant trends before the formal complaint stage.

### 5.6.1 Enhancing the Utilization of EEO Officers and Counselors

Because EEO Counselors can be effective in preventing the development of formal complaints by recognizing problems and concerns, OSDBU/CR will hold quarterly meetings with all headquarters EEO Counselors and an annual meeting with both headquarters and regional EEO Counselors. In addition to quarterly meetings, OSDBU/CR will continue to collect counseling statistics from EEO Counselors on a quarterly basis. In turn, OSDBU/CR will assemble and analyze the data before feeding it back to EEO Counselors and NRC management. The data will include the number and nature of complaints originating in each organizational unit; the number and nature of EEO contacts with employees assigned to each unit; and the total time spent counseling employees and applicants on EEO related matters. Summary data will be presented to the EEO in quarterly EEO program reviews.

EEO Officers are involved in the formal stages of EEO complaints. Since there have been relatively few formal complaints at NRC, EEO Officers did not have the opportunity to see Agency trends in EEO or share perceptions with others in the EEO program. Accordingly, in FY-1985 OSDBU/CR EEO officers participated in the plenary meeting of EEO Counselors. This will increase dialog between EEO Counselors and Officers and enhance understanding of overall EEO problems at NRC.

### 5.6.2 Enhancing the Internal Complaint Management System

The current complaint management system is effective and efficient in meeting all statutory and regulatory requirements in a timely manner. However, complainants continue to experience lengthy delays when formal EEOC hearings are held. Consequently, OSDBU/CR has established and maintains quarterly contact with all employees and applicants who have a complaint in process. Although

Although these contacts do not shorten the process, they identify factors which could lengthen the process and allow OSDBU/CR staff to intervene.

### 5.6.3 Improving Liaison with EEOC

The most significant part of formal EEO complaint processing is in the hands of the EEOC. In the past, the lengthy EEOC hearing process has been a source of frustration to NRC employees with formal EEO complaints in adjudication. During FY-1986, OSDBU/CR staff will maintain contact with their EEOC counterparts to improve the dialog between the agencies.

## 5.7 EEO Training and Awareness Programs

Since its establishment, NRC has conducted programs to increase staff awareness and sensitivity to EEO related matters. These programs will be continued and expanded in FY-1986.

### 5.7.1 EEO Training for Supervisors and Managers

EEO training for managers and supervisors at the branch chief level and below was developed by OSDBU/CR and MDTs in FY 1984. This course will be continued in FY-1986 for all newly appointed supervisors and managers, as appropriate.

### 5.7.2 Increasing Employee Awareness and Participation in EEO Activities

As in previous years, OSDBU/CR will prepare and disseminate information to all NRC employees informing them of the various EEO activities and soliciting their participation. Special solicitations will be sent to recognized special interest groups to encourage them to develop some activity to be presented during their commemorating week or month.

### 5.7.3 Assessing EEO Performance Problems

The Office of Small and Disadvantaged Business Utilization/Civil Rights and the FWP Manager, in consultation with the EEO Advisory Committees, will conduct a survey of all minorities and women who leave the Agency to determine whether EEO program performance contributed to their decision to leave the Agency and if so, what can be done to correct the problem. The results of these surveys are to be factored into subsequent EEO Program Plan updates and be used by the Director, OSDBU/CR in his evaluations of the EEO performance of staff managers.

To minimize the resources required, the Commission recommends a written form to be administered to all employees during the existing procedures.

## 5.8 Improving Program Coordination

In order to improve coordination during the implementation of the FY-1986 EEO Program Plan, regular communication will be continued between OSDBU/CR and ADM, the principal supporting office. The Director, OSDBU/CR, and the Director, ADM, will meet periodically to informally review the implementation of the EEO Program Plan and resolve operational problems.

The EDO will establish an Ad Hoc Committee by October 1985 to review the efforts of various constituency committees in order to enhance their overall effectiveness and coordination. The Committee will provide recommendations to the EDO by December 1985.

#### 5.8.1 Monitoring Implementation

Each individual project and activity identified in this EEO Program Plan will be tracked by OSDBU/CR. Significant deviations from planned accomplishments in any activity will be discussed with the responsible offices in order to maintain momentum.

The Civil Rights Program Manager (CRPM) and the Federal Women's Program Manager (FWPM) will hold quarterly meetings with the EEO constituent group committees and other interested groups such as BIG to review the progress of the EEO Program Plan. Significant issues and problems will be brought to the attention of the Director, OSDBU/CR, and the EDO.

During FY-1986, the Director, OSDBU/CR, will brief the EDO and senior managers at a regularly scheduled NRC Management Meeting. An annual report will be submitted to the Commission. The various EEO constituent groups will be invited to take an active part in preparing these briefings.

#### 5.9 Management Accountability

Management accountability is the key factor in a successful EEO and affirmative action program. Because of the central role Office Directors and Regional Administrators play in personnel management decisions and organizational planning, the FY-1986 EEO Consolidated Program Plan continues to fix special management accountability at this level.

##### 5.9.1 Fixing Accountability for EEO Accomplishments

Office Directors and Regional Administrators work with the EDO to prepare their individual SES performance plans for the 1985-86 cycle. As part of this process, each Office Director and Regional Administrator will include specific EEO and affirmative action initiatives. The Director, OSDBU/CR, will also suggest a possible range of activities. For example, an office with a small number of minority technical staff may make a commitment for someone from its staff to participate in recruitment trips to selected colleges and universities. Similarly, a Regional Administrator might plan to speak to a number of minority and women's organizations to make their membership better aware of NRC programs and employment opportunities. Activities and planned accomplishments will be reviewed in January 1986 and updated as necessary; for example, hiring goals for each office cannot be set until OSDBU/CR completes its analysis of possible underrepresentation. All initiatives and activities will be developed to address achievement of the objectives in the FY-1986 EEO Program Plan.

##### 5.9.2 NRC EEO Award

The NRC Equal Employment Opportunity Award will continue to be used to recognize the efforts of individual managers in the pursuit of EEO and affirmative action.

### 5.9.3 Summary of Resource Requirements

To implement the FY-1986 EEO Program Plan, NRC staff plans to use about 8.0 direct FTE staff years: 3.0 FTE in OSDBU/CR, 3.0 in O&P, 1.0 in MDTs, and about 1.0 from drawing on program office and regional staff for recruiting and related activities; \$190,000 in program support funds for training related activities, EEO complaint investigations, and recruiting; and \$15,000 for travel. Sufficient resources are available in the FY-1986 budget estimates to implement the Plan although some resource reprogramming may be necessary.

## GLOSSARY

Affirmative Action: In employment law, specific employment-related actions which are designed to encourage protected groups to apply for positions and to remove any improper, artificial barriers to subsequent advancement.

Bridge Position: A position specifically designed, within the Upward Mobility Program, in which an employee will train while making a transition from a position in one occupational series to a position in another with greater promotional potential.

Career Ladder: The entry and developmental grade levels leading to the full performance level of a given position.

EEO Counselor: An NRC employee appointed and formally trained to assist employees and applicants with complaints of discrimination and to seek an informal resolution of the complaint.

EEO Officer: A senior NRC employee or manager appointed and formally trained to analyze and reach a conclusion on discrimination complaints. The EEO Officer reviews investigative reports and prepares a proposed disposition letter for the EDO.

Handicapped Persons: A person who has a physical impairment which (1) substantially limits one or more of such person's major life activities, (2) has a record of such an impairment, or (3) is regarded as having such an impairment. In this Plan handicapped persons means qualified handicapped persons, i.e., a person who, with or without reasonable accommodation, is qualified for and can perform the essential functions of a particular position.

Job Fair: A 1 to 3-day meeting of prospective employees and employers arranged by a professional recruiting firm; companies and agencies rent space from the recruitment firm; applicants do not pay a fee.

Job Related Training: Training or education programs whose primary objective is to provide knowledge, skills, or abilities which can be utilized by employees in performing their current duties or those that they can be reasonably expected to do in the future.

Protected Group: Classes of persons afforded statutory and regulatory rights to non-discrimination on the basis of their race, color, national origin, religion, sex, age, or handicap.

Target Position: A position, within the Upward Mobility Program, which an employ will ultimately occupy after successfully completing the program and meeting all other requirements.

Underrepresentation: As defined by the Equal Employment Opportunity Commission (EEOC), the situation when the absolute percentage of members of a protected group is lower than their availability in the civilian labor force.

Upward Mobility: A systematic management effort that focuses personnel policy and practice on the development and implementation of specific career opportunities for employees at GG-9 or below who are in positions or occupational series which do not enable them to realize their full potential.