

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION	4
1.1 Background	4
1.2 Purpose of Review	6
1.3 Scope and Methodology	7
2.0 FINDINGS & CONCLUSIONS	8
2.1 Organization and Other Practical Aspects	8
2.1.1 Organization and Length	9
2.1.2 Readability, Clarity, and Visual Features	9
2.1.3 Accessibility	10
2.1.4 Conclusions	10
2.1.5 Recommendations	11
2.2 Goals and Objectives	11
2.2.1 Extent to Which Stated Goals Are Met	12
2.2.2 Adequacy of Strategic Goals and Objectives	13
2.2.3 Conclusions	16
2.2.4 Recommendations	16
2.3 Performance Measures	17
2.3.1 Objectivity, Measurability and Usefulness	17
2.3.2 Performance Measure Targets	19
2.3.3 Conclusions	21
2.3.4 Recommendations	21
2.4 Budget Links, Management Challenges, External Factors, Verification and Validation of Data, and Program Evaluations	22
2.4.1 Links Between EEOC's Budget and its GPRA Reporting	22
2.4.2 Management Challenges	22
2.4.3 External Factors	24
2.4.4 Verification and Validation of Data	24
2.4.5 Program Evaluation	25
2.4.6 Conclusions	26
2.4.7 Recommendations	27
3.0 MATTERS FOR CONSIDERATION, CONTEXT OF RECOMMENDATIONS, AND EVALUATION FOLLOW-UP	28

APPENDICES

Appendix A	Acronym List	A-1
Appendix B	Office of Resource and Information Planning Comments and OIG Response	B-1

EXHIBITS

Exhibit 1	Useful and Less Useful GPRA Goals and Measures	5
Exhibit 2	Summary Table of Ratings for the 2004 Plan and 2002 Report–Organization and Other Practical Aspects	8
Exhibit 3	Summary Table of Ratings on Goals and Strategic Objectives	11
Exhibit 4	Summary Table of Ratings on Performance Measures	17
Exhibit 5	Objective, Measurable, and Quantifiable Performance Measures	18
Exhibit 6	Performance Measures That Fail to Meet Standards	18
Exhibit 7	Summary Table of Ratings on Management Challenges, External Factors, Verification and Validity of Data, and Program Evaluations	22

EXECUTIVE SUMMARY

The *Government Performance and Results Act of 1993* (Public Law 103-62), also known as GPRA, requires federal agencies, including the EEOC, to align program outputs and activities and to measure outcomes that clearly impact American citizens. GPRA contains three performance management requirements—Agency Strategic Plans, Annual Performance Plans, and Annual Performance Reports.

This report is intended as a baseline assessment of the Agency's *Fiscal Year 2004 Budget Request and GPRA Annual Performance Plan and Annual Program Performance Report—FY 2002*. The review's primary objective is to determine how well EEOC presents GPRA-related information, including support for key data.. We emphasize that this is *not* an assessment of agency performance, but an assessment on *how* performance is reported. We discuss the 2004-2009 Strategic Plan, but because it is primarily a strategic, and not a reporting, document, this assessment does not focus on it. Major objectives are to determine:

- The usefulness, to Congress and other stakeholders, of *Fiscal Year 2004 Budget Request and GPRA Annual Performance Plan and Annual Program Performance Report—FY 2002*
- EEOC's status in achieving key outcomes and meeting key challenges
- The adequacy of the goals, objectives, and performance measures contained in the 2004 Plan and 2002 Report
- The quality of the organization and other practical aspects of the 2004 Plan and 2002 Report

Our review found EEOC's latest Performance Report and Performance Plan contain much information that is useful in determining:

- intended performance across the Agency
- credibility of EEOC's performance information
- progress towards meeting Agency goals

However, in each of these areas, we found significant gaps between what EEOC reported and standards set forth in GPRA reporting guidelines. Major areas for improvement include:

- presenting information more clearly and providing timely public access to the Performance Report and Performance Plan
- including goals and measures that will provide a fuller picture of intended performance
- adding adequate descriptions of the methods used to ensure the accuracy and reliability of performance data

In March, 2002, OIG provided ORIP with a draft report assessing how well EEOC reported GPRA performance information in the 2000 Annual Report and the 2002 Annual Plan. Some of the weaknesses in the 2000 Annual Report and the 2002 Annual Plan, noted by OIG in the draft report (OIG-01-12-AMR—a document intended to promote discussion and improvement in reporting practices) have been eliminated or reduced significantly.

Improvements include:

- objectiveness and clarity of performance measures
- performance measure target setting
- integrating budget and performance data
- graphics and other visual features

Major conclusions and recommendations are highlighted below—the full results of this review are described throughout the report.

CONCLUSIONS ABOUT THE PERFORMANCE REPORT AND PERFORMANCE PLAN

Primary conclusions: organization and other practical aspects	Primary conclusions: GPRA goals and objectives	Primary conclusions: GPRA performance measures	Primary conclusions: management challenges, external factors, verification and validity of data, and program evaluations
<p>Conclusion 2.1.4a: Overall, the 2002 Annual Performance Report and 2004 Annual Performance Plan are well organized and presented in a reasonable manner.</p> <p>Conclusion 2.1.4b: The 2002 Annual Report and 2004 Annual Plan are not made available easily or in a timely manner to the public.</p>	<p>Conclusion 2.2.3a: Several major Agency activities, including cross-cutting efforts, lack adequate outcome-focused goals.</p>	<p>Conclusion 2.3.3a: The Agency should continue its efforts to improve the objectiveness and clarity of performance measures.</p> <p>Conclusion 2.3.3b: The Agency could significantly improve GPRA reporting by ensuring that each major goal and program contains sufficient performance measures to make an overall assessment of progress to goals.</p> <p>Conclusion 2.3.3d: The Agency could significantly enhance its GPRA reporting by obtaining and using baseline and benchmark data.</p>	<p>Conclusion 2.4.6a: Linkage between the budget and performance goals exist but need significant improvement.</p> <p>Conclusion 2.4.6b: Management challenges and external factors should be clearly identified and discussed.</p> <p>Conclusion 2.4.6c: Reported validation and verification activities are not adequate.</p> <p>Conclusion 2.4.5d: EEOC recognizes that program evaluation reporting and activities need improvement.</p>

RECOMMENDATIONS AND MATTERS FOR CONSIDERATION

Based on the conclusions, we offer nine recommendations. We have taken into account the new EEOC strategic plan and ORIP comments on the draft report (see Appendix B). In reviewing actions taken in response to recommendations, OIG will take into consideration ORIP's need for cooperation with other parties, and other time-consuming factors.

Recommendation 2.1A: Improve the presentation of tables and graphics through uniform presentation standards.

Recommendation 2.1B: Make the Performance Plan and Performance Report accessible and timely for the public by ensuring that they are on the Agency website within one week after they are published on paper.

Recommendation 2.2A: Develop goals and appropriate performance measures for the cross-cutting goals described in Strategic Plan.

Recommendation 2.3A: Refine customer satisfaction measures for mediation and education and training.

Recommendation 2.3B: Include baseline data for new measures, to ensure that proper targets are selected and that readers understand the targets are reasonable.

Recommendation 2.3C: Improve performance measure targets. Targets should be achievable, but challenging, and require significant improvement.

Recommendation 2.4A: Show increasing links between the budget and performance goals and activities in Subsequent Performance Reports.

Recommendation 2.4B: Clearly identify all major management challenges and external factors and include a brief discussion of EEOC's actions to address the challenges and external factors.

Recommendation 2.4C: Improve Validation and Verification reporting, including providing a clear description of the methods and procedures in place for ensuring lack of significant error rate, and the problems with the procedures, so that the reader can judge whether performance data will be free of bias and other significant error.

Recommendation 2.4D: Add information about the ongoing and planned program evaluations.

Matters for Your Consideration: Partner with another agency to improve performance reporting.

Additional detail concerning findings, conclusions, and recommendations are provided throughout this report. Appendix B contains ORIP comments on the draft report and our response to the comments.

1.0 INTRODUCTION

This section of our report provides background on performance reporting, including the *Government Performance and Results Act of 1993* (Public Law 103-62), commonly known as GPRA. This section also introduces the issues and terms covered in the report and describes the scope and methodology of our review.

1.1 BACKGROUND

GPRA is one of several pieces of legislation that affect the way Federal agencies are required to manage their programs. These laws aim to improve mission performance, management of programs, and use of resources.

GPRA is intended to focus government decision making, management, and accountability on results and outcomes. GPRA requires agencies, including EEOC, to link Agency resources, program outputs and activities and to measure outcomes that clearly impact American citizens. Impact, the ultimate result of an organization's efforts, is often not entirely within the control of the organization.

GPRA focuses on achievement of mission related results through requirements for planning, budgeting, assessment, and accountability. These results (outcomes) are what an agency wishes to accomplish, not agency products and services (outputs) or processes. GPRA contains three performance management requirements—Agency Strategic Plans, Annual Performance Plans, and Annual Performance Reports. Exhibit 2, on the following page, summarizes the GPRA Performance Management Cycle, including the three key performance management requirements.

The Strategic Plan looks ahead six years at what the Agency plans to accomplish. The Performance Plan links the goals in the Strategic Plan to Agency activities by identifying measures for tracking Agency performance. The Performance Report demonstrates how well the agency performed in its efforts to accomplish goals and meet level of performance goals (targets).

In order to meet the outcome-oriented purpose of GPRA, EEOC must define, measure, and report on key aspects of performance. Performance in any organization can be measured at three levels—activity, output, and outcome. Impact is a high form of outcome.

GPRA focuses on outcomes. Therefore, organizations that can focus performance measurements on outcomes and impacts may better achieve GPRA's planning and reporting requirements than those that do not. Unfortunately, outcomes are often difficult and costly to measure.

Examples of useful and less useful GPRA goals, taken from the cited agencies' plans are shown in Exhibit 1.

Exhibit 1. Useful and Less Useful GPRA Goals and Measures

Agency	Goal or Measure	Usefulness as a Performance Indicator
U.S. Small Business Administration	Jobs Created by SBA Borrowers	Useful: the measure ties directly to the purpose of the 504 loan program*
U.S. Small Business Administration	Improved access to capital and credit	Not useful: it is output-based, not directly linked to whether a business succeeded*
<i>Agencies with similar work process as EEOC</i>		
National Mediation Board	Mediate to closure 70 railroad and airline mediation cases	Useful: results oriented, directly ties to agency mission**
Federal Labor Relations Authority	Use and promote alternative methods of resolving and avoiding disputes and provide services to enhance labor-management relationships	Not useful: it is activity, not result-based**

* source of analysis: , Office of the Inspector General U.S. Small Business Administration, May, 2001

** source of analysis: Office of Inspector General, U.S. Equal Employment Opportunity Commission, June, 2003

EEOC Performance Planning and Reporting

EEOC began its GPRA activities in 1996. After a one-year planning process, EEOC submitted its first strategic plan to Congress in 1997, and submitted an updated strategic plan in the year 2000. A new strategic plan (for fiscal years 2004-2009) was completed in September, 2003. The Strategic Planning Working Group (SPWG), represented by at least one staff member of all EEOC offices, developed the new strategic plan. The new strategic plan is not a performance-based document and therefore not within the primary scope of our review. Because the new strategic plan affects the context for our recommendations, we took it into consideration in formulating our recommendations.

The Strategic Planning and Management Controls Division, (SPMCD) located within the Office of Research, Information and Planning (ORIP), is responsible for leading and/or coordinating several EEOC GPRA activities.

In 2002, OIG provided ORIP with a draft report concerning the 2000 Annual Report and the 2002 Annual Plan. Many of the weaknesses noted by OIG in that report have been eliminated or reduced significantly. Improvements include:

- objectiveness and clarity of performance measures
- performance measure target setting
- integrating budget and performance data
- graphics and other visual features

Therefore, this report contains fewer recommendations than the 2002 draft report. As stated in the 2002 draft report, we understand that implementing some changes may take a considerable period of time and may require redeployment of resources and/or additional resources, as well as extensive coordination and cooperation with other EEOC offices. Other changes, such as those regarding accessibility, require modest resources and could be implemented shortly.

OIG also conducted performance-related work (i.e., OIG has recommended that the EEOC reevaluate the performance measurement process for the Agency's Revolving Fund (*Performance Audit of the Education, Technical Assistance and Training Revolving Fund*, January 22, 2002))

1.2 PURPOSE OF REVIEW

The Office of Inspector General (OIG) conducted a review of the Agency's performance reporting. A baseline assessment of the Agency's performance reporting can be helpful to Agency management and others wishing to assess EEOC's progress, including:

- Meeting its mission and goals
- Meeting management and other goals laid out by OMB and others
- Meeting management challenges

This review is intended as a general assessment of the Agency's *Annual Program Performance Report—FY 2002* (Performance Report) and *Fiscal Year 2004 Budget Request and GPRA Annual Performance Plan* (Performance Plan). It is *not* a review of the Agency's reporting system and/or processes, although an understanding of the system and processes is necessary to place the assessment in the proper context.¹ It also does not assess the adequacy of the budget request amounts. The review's primary objective is to determine how well EEOC presents GPRA-related information, including support for key data. Major objectives are to determine:

¹ In the course of the project, we obtained key information about the GPRA processes at EEOC.

- The usefulness, to Congress and other stakeholders, of the *Annual Program Performance Report–FY 2002* and fiscal year *Fiscal Year 2004 Budget Request and GPRA Annual Performance Plan*
- EEOC's status in achieving key outcomes and meeting key challenges
- The adequacy of the goals, objectives, and performance measures contained in the Performance Plan and Performance Report
- The quality of the organization and other practical aspects of the Performance Plan and Performance Report

Because there are no published assessments of EEOC's performance reporting and planning documents, this report seeks to establish a baseline on the most critical items in those documents, including those items cited above. Other Inspectors General have conducted reviews of their agencies' GPRA reporting, including evaluation of performance measures.

1.3 SCOPE AND METHODOLOGY

The scope of this review focuses on the adequacy of EEOC's goals, measures, objectives, and strategies to meet goals and objectives, availability and reliability of data supporting performance information, and the quality and availability of communication in the Performance Plan and Performance Report.

OIG interviewed Agency officials and reviewed pertinent documents, including:

- EEOC's 2002, 2003, and 2004 Performance Plan
- EEOC's 2000, 2001, and 2002 Performance Report
- EEOC's 2000-2005 Strategic Plan and update materials
- EEOC's 2004-2009 Strategic Plan
- *Government Performance and Results Act of 1993* (Public Law 103-62)
- OMB Circular No. A-11, part 2 (and other GPRA reporting guidance)

OIG compared elements of EEOC's most recent final GPRA documents (the 2004 Performance Plan and 2002 Performance Report) to various standards. The standards used for evaluating the Performance Plan and Performance Report were developed from several sources, including GAO, OMB, and the Mercatus Institute (a research institution affiliated with George Mason University). Standards derived from GAO include those found in *GAO/GGD-10.1.20 Guide to Assessing Agency Annual Performance Plans, 1998*. OMB-derived standards are found in *OMB Circular No. A-11, part 2*.

This report was conducted in accordance with generally accepted government auditing standards as published in the Comptroller General's Government Auditing Standards, 1999 Revision and through the amendments of 2003. The review took place from March 2003 through June 2003.

2.0 FINDINGS AND CONCLUSIONS

OVERALL

Our review found EEOC's latest Performance Report and Performance Plan contain much information that is useful in determining:

- intended performance across the Agency
- credibility of EEOC's performance information
- progress towards meeting Agency goals

However, in each of these areas, we found significant gaps between what EEOC reported and standards set forth in GPRA reporting guidelines. Major areas for improvement include:

- presenting information more clearly and providing timely public access to the Performance Report and Performance Plan
- including goals and measures that will provide a fuller picture of intended performance (the Annual Plan)
- adding adequate descriptions of the methods used to ensure the accuracy and reliability of performance data

ORGANIZATION

This Section provides findings, conclusions, and recommendations regarding EEOC's *Annual Program Performance Report—FY 2002* and *2004 Budget Request and GPRA Annual Performance Plan*. Section 2.1 presents organization and other practical aspects, Section 2.2 assesses goals and objectives, Section 2.3 evaluates performance measures, and Section 2.4 covers management challenges, external factors, verification and validity of data, and program evaluations. The final subsection of each Section presents conclusions and recommendations.

2.1 ORGANIZATION AND OTHER PRACTICAL ASPECTS

Subsection 2.1.1 assesses the EEOC's Performance Plan and Performance Report on Organization, and Length, Subsection 2.1.2 assesses Readability, Clarity, and Visual Features, subsection 2.1.3 discusses Accessibility, 2.1.4 presents conclusions, and 2.1.5 contains recommendations.

Organization and other practical aspects of the Performance Plan and Performance Report are important because they affect readability and the overall impression the reader receives. Organization and the other characteristics reviewed in this Section reflect criteria used by the Mercatus Group.

Overall, EEOC receives a "Fair" rating in this category. Many features received a "Good" rating. However, accessibility receives a "Poor" rating. Exhibit 2 summarizes the ratings in Organization and Other Practical Aspects of the Performance Plan and Performance Report.

Exhibit 2. Summary Table of Ratings for the EEOC 2004 Performance Plan and 2002 Performance Report--Organization and Other Practical Aspects

C A T E G O R Y							
	General Organization	Length	Readability	Clarity	Visual Features	Accessibility	Overall
2004 Plan	Good	Good	Good	Good	Fair	Poor	Fair
2002 Report	Good	Good	Fair	Good	Fair	Poor	Fair

Notes: Good = almost always met standard/criteria
 Fair = often met standard/criteria
 Poor = usually did not meet standard/criteria

Several categories, including clarity and visual features, are improved from the 2003 Plan and 2001 Report, while accessibility declined.

2.1.1 Organization and Length

Organization

The 2004 Performance Plan and the 2002 Performance Report are generally well organized. Each document contains an easy to follow table of contents. In addition, the organization of material is also logical. For example, the 2004 Performance Plan addresses major programs and activities that directly affect the public before discussing executive direction and support. In order to be easily understood, simple and effective organization is critical.

Length

Both documents rate highly for containing an effective length. The Performance Plan, at 81 pages, is a good length for size and scope of Agency activities and blending of budget request and performance information. A reader can obtain a high degree of detail, but not get bogged down in information that is not central to each issue. Similarly, the Performance Report, at 35 pages, generally presents an appropriate level of detail, with additional information contained in appendices.

2.1.2 Readability, Clarity, and Visual Features

Readability

The Performance Plan and Performance Report are, for the most part, highly readable. For example, each document contains adequate white space to enable the reader to move quickly through each page. In addition, exhibits are usually presented on the same page as the accompanying text.

However, both the Performance Plan and Performance Report fail to place the Strategic Objective text on the same page as the measures to support the objective. This means that the reader (unless she memorizes the Strategic Objective) must go back a page or more to understand how the objective fits the measure.

Clarity

The 2002 Performance Report and 2004 Performance Plan each attained good results for clarity. The Performance Plan and Performance Report contain generally clear and declarative statements. Each document is also relatively free of jargon that would make it hard for a non-employment law expert to understand. For non-specialists to quickly understand the contents of any agency's Performance Reports and Performance Plans, the documents must use clear language.

Visual Features

The visual features of the Performance Report and Performance Plan contain several characteristics that detract from their usefulness. Some visual features of each document are effective, such as the use of bullet points to emphasize key information.

One visual feature deficiency is that some tables are interrupted with blank space, making it difficult to determine if some data may be missing. A distracting feature is that the words "employee," "employees," "employer," and "employers" are partially underlined in the Performance Report.

Tables and graphs are used moderately well in the Performance Plan and Performance Report. For example, Agency workload data is clearly presented in table format. Most tables and graphs in the report are consistent in appearance. Much of the inconsistent and distracting graphics present in previous reports, were eliminated. However, tables vary considerably in appearance, causing the reader to frequently pay attention to the form, rather than the substance, thereby making it more difficult to comprehend the information.

2.1.3 Accessibility

Accountability to the public requires readily available Performance Reports and Performance Plans. Unfortunately, the 2004 Performance Plan was not made available on the public website until more than six months after issuance, and the 2002 Performance Report was not made available on the website until more than three months after issuance. This is a major weakness, given that these documents can provide stakeholders and the general public with vital information about past performance and plans for improving performance. OMB states that following transmittal to Congress, both the Performance Report and Performance Plan should be made quickly and readily available, in electronic format, to the public.

2.1.4 Conclusions

Conclusion 2.1.4a Overall, the 2002 Performance Report and 2004 Performance Plan are well organized and presented in a reasonable manner. Tables and graphs could be improved with consistent standards.

Conclusion 2.1.4b Neither performance document was available timely to the public via the Agency website. Making these documents readily available and easy to find (within three mouse clicks) would remedy the problem.

2.1.5 Recommendations

OIG recommends the Director, Office of Research, Information and Planning, ensure that:

2.1A The Strategic Planning and Management Controls Division improve the presentation of tables and graphics by ensuring uniform presentation standards.

2.1B The Office of Research, Information and Planning make the Performance Plan and Performance Report accessible and timely for the public by ensuring that they are on the Agency website within one week after they are published in paper.

2.2 GOALS AND OBJECTIVES

This section assesses the goals and objectives in the Performance Report and Performance Plan. Subsection 2.2.1 assesses the extent to which EEOC reporting documents meet the stated major goals and objectives, Subsection 2.2.2 assesses several measures of adequacy of selected goals and objectives, subsection 2.2.3 presents conclusions, and subsection 2.2.4 contains recommendations.

The Agency's 2004 Performance Plan and 2002 Performance Report received ratings of fair because some goals and objectives are either not objective or not focused on end results and outcomes. Strategic goals and objectives are important because they link the mission of an agency and the measures that assess progress in achieving the mission. Exhibit 3 summarizes these results for each key criteria.

Exhibit 3. Summary of Ratings for Strategic Goals and Strategic Objectives

C A T E G O R Y					
	Stated Goals Met	Key Strategic Goal Areas Included	Objectives Include Outcomes Reflecting the Strategic Goals & Mission	Goals Reflect Activities Supporting Cross-cutting Program	Overall Rating
2004 Plan	Not applicable	Fair	Fair	Fair	Fair
2002 Report	Fair	Fair	Fair	Fair	Fair

Notes: Good = almost always met standard/criteria
 Fair = often met standard/criteria
 Poor = usually did not meet standard/criteria

The 2004-2009 Strategic Plan presents several different strategic goals and objectives than those in the 2004 Annual Plan. If these are adequately incorporated into EEOC reporting documents, this area could improve.

2.2.1 Extent to which Stated Goals Are Met

The 2002 Performance Report receives a rating of "Fair" because the objectives and measures often support the goals, however, they do not adequately cover the breadth of the goals, preventing full assessment of whether the goals were met.

For example, Strategic Goal 2 is to "Promote equal opportunity in employment." Of the nine measures supporting the two Strategic Objectives under Strategic Goal 2, eight are activity based and/or vague, including:

- measure 2.1.1—The number of consultations with employer stakeholders on operational and legal issues (activity based)
- measure 2.2.4—Provide EEOC informational material to federal sector employees and employee groups (activity based and vague)

The reliance on numbers of events, persons, or activities does not provide for assessment of the effectiveness of the events and activities. Therefore, the nine measures, while presenting some useful information, are of limited use.

2.2.2 Adequacy of Strategic Goals and Objectives

The 2004 Performance Plan received a rating of "Fair" in adequacy of strategic goals and strategic objectives. While each of the strategic goals are adequate, and some strategic objectives are focused on end results and outcomes, a significant number are not.

Key Strategic Areas Included in GPRA Reporting

The three major strategic goals relate closely to the Agency's mission by emphasizing enforcement, outreach, and management outcomes. For the 2004 Performance Plan, the Agency retained each of its three Strategic Goals from the 2003 Performance Plan. All strategic objectives were also retained. This continuity allows the Agency to maintain a history of performance against established goals.

Objectives Include Outcomes Reflecting the Strategic Goals and Mission

The Agency's strategic objectives are important because they link the broad strategic goals to the particular performance measures. Some of the Agency's Strategic Objectives are outcome-based and cover critical Agency efforts, making the objectives highly useful. However, many of the strategic objectives are not effective because they are process-oriented, and do not link to mission-related outcomes. All Strategic Objectives are evaluated below.

Strategic Objective 1.1

Improve the effectiveness of the private sector enforcement program, including the use of charge prioritization, mediation and, litigation.

This strategic objective is outcome oriented, focusing on improved effectiveness of the private sector enforcement program. This strategic objective supports quantitative performance measures concerning the business of enforcement.

Strategic Objective 1.2

Enhance the effectiveness of the federal sector program by utilizing a comprehensive enforcement strategy.

This objective is also outcome oriented and centered on improved effectiveness, promoting the creation of performance business-like quantitative performance measures.

Strategic Objective 1.3

Strengthen partnerships with State and Local Fair Employment Practices Agencies (FEPAs) and Native American Tribal Employment Rights Organizations (TEROs) to enhance effective implementation of laws addressing employment discrimination.

This Strategic Objective is process-oriented (*how* something is performed), not outcome (bottom line) oriented. The cited objective is to *strengthen partnerships* with various state and local organizations in order “to enhance effective implementation of laws addressing employment discrimination.” A more pertinent objective would capture an outcome directly related to effective implementation of employment discrimination laws. In this way, the means (partnerships) are secondary to the end (implementation of laws) which can then be measured.

Strategic Objective 2.1

Encourage and facilitate voluntary compliance with equal employment opportunity laws among employers and employer groups in the private and federal sectors.

This strategic objective is process, not outcome oriented, and sets the stage for output, rather than outcome performance measures (e.g., number of classes taught or posters posted, rather than measurable changes in the policies or behaviors of employers and employer groups). Given the Agency's emphasis on promoting equality of opportunity in the workplace and enforcing federal laws prohibiting employment discrimination., this strategic objective would be improved by adding focus on the *effectiveness* of Agency actions, not the amount or type of actions taken.

Strategic Objective 2.2

Increase knowledge about individual rights under equal employment opportunity laws among the public and employee groups.

This objective is process oriented, not outcome oriented, and sets the stage for output, rather than outcome performance measures (e.g., number of consultations or publications, rather than measurable changes in the education level among the public and employee groups). This strategic goal places emphasis on the means by which EEOC attempts to influence equal opportunity results. Clearly, the Agency needs to continue measuring numbers of meetings and publications, as these outputs are necessary to achieve key outcomes. However, including these numbers in GPRA reporting is only moderately useful.

Strategic Objective 3.1

Enhance staff capabilities and substantive knowledge to improve work processes and job functions through training, partnership, team-based approaches, and customer-based principles.

This Strategic Objective is outcome oriented and captures several key workforce targets. However, the Agency does not include any other human capital strategic objectives in the 2004 Performance Plan. This objective does not take into account two areas that should have performance goals, retention of employees and appraisals linked to program performance.

Human capital is a key issue for federal agencies.

“Attention to strategic human capital management is important because building agency employees' skills, knowledge, and individual performance must be a cornerstone of any serious effort to maximize the performance and ensure the accountability of the federal government. GPRA, with its explicit focus on program results, can serve as a tool for examining the programmatic implications of an agency's strategic human capital management challenges.” (From the U.S. General Accounting Office, GAO-01-872T)

Strategic Objective 3.2

Provide policy direction and guidance to achieve all Strategic Goals.

This Strategic Objective possesses limited usefulness. Its strength is recognizing the importance of policy in accomplishing strategic goals. However, the objective is means-oriented and vague, greatly limiting its usefulness. For example, it appears most difficult to produce measures that can be quantified and have established baselines and meaningful indicators.

Strategic Objective 3.3

Instill a knowledge base by attaining and maintaining a robust technological competency and through research, analysis and evaluation of organizational components, procedures and processes.

This Strategic Objective seeks to address technology acquisition and simplifying directives, two issues that significantly affect accomplishment of the Agency mission. Because the Strategic Objective describes internal activities related to the Agency's knowledge infrastructure, means-oriented performance measures are likely to be, and are, used to assess progress. Means are the resources used to accomplish something. In this case, the objective is adequate because the nature

of infrastructure makes for measures which are the *means* towards accomplishing mission-related goals, not the *outcomes* that determine success in accomplishing mission-related goals.

However, the Strategic Objective is quite broad, encompassing technology and evaluation of various organizational characteristics. Technology acquisition and implementation does not appear to overlap significantly with streamlining directives. This makes a combined assessment of progress difficult and not as useful as separate assessments.

Cross-cutting Issues

The Performance Plan should identify goals reflecting critical aspects of cross-cutting programs. This means that for programs where other federal agencies are involved, it is helpful for agencies' Performance Plans to show coordination. Efforts noted in an Agency's Strategic Plan are often logical choices for inclusion in the Performance Plan. EEOC's 2000-2005 Strategic Plan identifies several such efforts. The 2004 Performance Plan contains some goals and corresponding measures and targets for these cross-cutting efforts. Cross-cutting efforts that are included in the 2004 Performance Plan include several performance measures under Strategic Objective 1.2. For example, Performance measure 1.2.4 relates to collecting and verifying EEO data from other federal agencies.

However, several significant cross-cutting efforts are not included. The Performance Plan does not include, measures concerning the cross-cutting efforts with Department of Justice, including coordination with the Department of Justice on cases involving allegations of discrimination against state and local government employees. Justice is responsible for litigating these types of cases. Similarly, EEOC and the Department of Labor issued memoranda in 1999 enabling both agencies to improve the enforcement of laws prohibiting workplace bias, particularly laws against employment discrimination in compensation. These memoranda establish better coordination and communications between the two agencies and provide for training to increase staff awareness of potential compensation discrimination cases. The 2004-2009 Strategic Plan includes several cross-cutting efforts as highly important in achieving prevention of employment discrimination.

2.2.3 Conclusions

Conclusion 2.2.3a Several major Agency activities, including cross-cutting efforts, lack adequate outcome-focused goals.

2.2.4 Recommendations

OIG recommends the Director, Office of Research, Information and Planning, ensure that:

2.2A The SPMCD continue to work with Office of Field Programs, Office of Federal Operations, and other offices as appropriate to establish goals and appropriate performance measures for cross-cutting efforts. It may be necessary to coordinate with the other agencies. EEOC could work with

the other agencies to develop a consistent set of performance measures that address these efforts. EEOC should strive to identify outcome-focused measures that track the effects of the cooperation.

2.3 PERFORMANCE MEASURES

Subsection 2.3.1 assesses the extent to which the measures are objective, quantifiable, and useful, 2.3.2 assesses the adequacy of measures' targets, subsection 2.3.3 presents conclusions, and 2.3.4 presents recommendations. Overall, the content of the performance measures earn a rating of "Fair." Exhibit 4 summarizes the results.

Exhibit 4. Summary of Ratings for Performance Measures

C A T E G O R Y					
	Objective	Measurable & Quantifiable	Useful/ Appropriate	Targets Adequate	Overall Rating
2004 Plan	Fair	Fair	Fair	Fair	Fair
2002 Report	Fair	Fair	Fair	Fair	Fair

Notes: Good = almost always met standard/criteria
 Fair = often met standard/criteria
 Poor = usually did not meet standard/criteria

2.3.1 Degree to Which Performance Measures Are Objective, Measurable and Quantifiable, and Useful

Objective, Measurable and Quantifiable

Generally, the performance measures in the Performance Report and Performance Plan are objective, measurable, and quantifiable. Examples of measures meeting standards in these areas are shown in Exhibit 5. The analysis focuses mostly on performance measures contained in the 2004 Plan because many of the measures in the 2002 report are no longer in use.

Exhibit 5. Objective, Measurable, and Quantifiable Performance Measures

Measure	How it meets standards
1.1.2 (2004 Performance Plan) Percent of sampled district office charge files with information supporting the categorization of the charges as "A," "B," or "C"	<ul style="list-style-type: none"> • what should be observed, time frame, and population are specified • specific target level or level of improvement are cited
3.2 (2004 Performance Plan) Improve the efficiency of paying commercial vendors	<ul style="list-style-type: none"> • what should be observed, time frame, and population are specified • specific target level or level of improvement are cited

However, in several instances, the measures are not clear. For example, Measures 1.3.2 and 3.1.1 in the 2004 Performance Plan are vague. Exhibit 6 details several instances of other inadequate performance measures.

Exhibit 6. Performance Measures That Fail to Meet Standards

Measure	Why the Measure Does Not Meet Standards
1.2.5 (2004 Performance Plan) Comprehensive review and assessment of federal agencies' EEO and affirmative employment programs.	<ul style="list-style-type: none"> • not outcome focused (conducting a review is an activity) • critical terms are not objective (i.e., what is a comprehensive review and assessment?)
3.-5 (2004 Performance Plan) Percent of all employees who pass that are required to take a core curriculum course using distance learning employee development center (e-learning)	<ul style="list-style-type: none"> • not outcome focused (completing a course is useful only if it leads to more effective employee performance) • difficult to understand
2.-2 (2004 Performance Plan) Target outreach activities based on a FY2003 survey of respondents in order to increase the respondent mediation participation rate.	<ul style="list-style-type: none"> • critical terms are not objective (i.e., what is targeting?) • measure does not match with its objective (i.e., the purpose of the measure is to quantify the increase in participation, <i>not</i> target activities)

Usefulness

Many of the performance measures contained in the Performance Plan and Performance Report contribute substantially to determining if the Agency is making progress towards performance goals. Performance measure 1.1.1, the “percent of resolved private sector charges resolved within 180 days” and 1.1.3 in the 2004 Performance Plan “Number and percentage of class cases successfully litigated,” ties directly to the Strategic Objective 1.1 and Strategic Goal 1.

Financial performance for the Agency is a key issue, and is included in the 2002 Performance Report in the form of several performance measures (e.g., Performance Measure 3.3.2). Unfortunately, a key financial measure of the Revolving Fund, present in the 2002 Report, is not included in the 2004 Performance Plan, as recommended in OIG report #01-07-APO, “OIG Performance Audit of the Education, Technical Assistance and Training Revolving Fund.” When cost is a key issue, it should be identified and assigned performance measure(s).

EEOC has also made progress in its reporting by eliminating many performance measures that simply measured activity levels and therefore were not particularly useful. For example, the performance measures aimed at increasing or simply recording the number of educational and outreach activities no longer exist. The 2002 Performance Report, in its narrative, duly notes some of these numbers so that readers can understand the scale of the activities. Performance measures that correspond with educational and outreach activities are now more closely geared to outcomes.

Several performance measures contained in the 2004 Performance Plan and 2002 Performance Report do not adequately indicate progress towards the Strategic Goals or Strategic Objectives. For example, Performance Measure 3.–4. in the 2004 Performance Report (“Employee performance plans linked to Agency strategic goals”) is an internal measure that, at best, is only vaguely related to how effectively the Agency performs its services (e.g., processing discrimination complaints or educating employers) and therefore does not indicate progress towards the strategic goal of Enhancing Agency Effectiveness.

The 2004-2009 Strategic Plan includes a limited number of performance measures and states that the plan will be used to establish annual performance measures for inclusion in the performance reporting documents. Many of the measures in the 2004-2009 Strategic Plan are objective, measurable, and quantifiable. Not enough information is provided to determine if the targets are adequate.

2.3.2 Performance Measure Targets

The Agency set many useful targets in the 2004 Performance Plan. However, *some* of the targets are not appropriate or not enough information is given to determine why particular targets were chosen.

Appropriateness of Targets

The 2004 Performance Plan and the 2002 Performance Report show that the Agency often sets adequate targets, an improvement over early GPRA reporting. For example, the target for measure 1.2.3 in the 2004 Performance Plan doubles the percentage (from 20 to 40) of EEO appeals cases from other federal agencies that are resolved within 180 days. Targets, also known as performance goals, are a desired level of performance expressed as a tangible, measurable objective, against which actual performance can be compared.

EEOC has improved target setting, but weaknesses remain. EEOC no longer meets or exceeds every target, as was the case in the 2002 Performance Report. This indicates that EEOC is setting more challenging targets, a good sign. However, some targets are still inadequate. For example, the proposed 2003 and 2004 targets for "Percent of private sector charges resolved within 180 days" (performance measure 1.1.1.), is 60 percent. EEOC achieved 64 percent and 65 percent in 2001 and 2002 respectively. Setting a goal lower than the current level of performance (or at an extremely modest level) does not encourage improved performance and indicate that a lower achievement level is acceptable.

Most targets are clear, including the proposed 2003 and 2004 measures under Strategic Goal 3, "Enhance Agency Effectiveness" contained in the 2004 Performance Plan, but several are not, rendering the data of limited use. For example, "Pilot comprehensive review and assessment of 6 federal agencies." (It is not clear what would constitute success for this target—initiating the reviews, completing the reviews, or some other level or performance).

Baseline and Benchmark Data

The performance measures in EEOC's Performance Report sometimes do not include adequate baseline and bench marking data to allow firm understanding of progress. GPRA reporting on performance measures should include baseline data to allow for a view of progress. For example, Performance Measure 2.–3. in the 2004 Performance Plan, does not provide information about the extent to which individuals may believe training is useful now. Without an indication of the baseline number, a target of 50 percent can appear unambitious and/or a number that was not developed in a considered fashion.

Benchmark data from other organizations could be helpful in setting targets and assessing results. For example, if the benchmark organization (i.e., a comparable government organization with comparable systems) strives for 90 percent, EEOC would want to reconsider 50 percent as a target. EEOC does not regularly obtain, use, and report baseline and benchmark data when developing performance measure targets.

2.3.3 Conclusions

Conclusion 2.3.3a While most performance measures in the Performance Plan and Report are objective and measurable, the Agency should continue its efforts to improve the objectiveness and clarity of the measures. Thorough review of the wording of measures and development of new measures would result in improved understanding by decision makers and those working to achieve and accurately measure success in meeting goals. Measures identified in this report and other sources as "needing improvement" are logical measures to address. The performance measures included in the 2004-2009 Strategic Plan are a good beginning towards overall improvement in performance measures.

Obtaining knowledge from experts outside the Agency and gathering input from those in the Agency with expertise and resources for developing, reviewing, and refining performance measures could help ensure continued improvement in performance measure development.

Conclusion 2.3.3b The Agency could significantly improve performance reporting by ensuring that each major goal and program contains sufficient performance measures to make an overall assessment of progress to goals.

Conclusion 2.3.3c The Performance Plan and Performance Report often lack the baseline or benchmark information necessary to determine the adequacy of performance measure targets and progress towards a goal.

Conclusion 2.3.3d The Agency could significantly enhance its performance reporting by obtaining and using baseline and benchmark data when developing performance measure targets.

2.3.4 RECOMMENDATIONS

OIG recommends the Director, Office of Resources, Information and Planning ensure that:

2.3A The Strategic Planning and Management Controls Division work with the Office of Field Programs and other offices as appropriate to improve measurement of customer satisfaction for mediation and education and training. The EEOC, particularly in the 2004-2009 Strategic Plan, has recognized customer satisfaction as a vital component of assessing progress towards goals. Surveying best practices in assessing customer satisfaction (private and public sector) should provide helpful insights for developing new, and improving existing, measures.

2.3B The Strategic Planning and Management Controls Division work with the Office of Field Programs and other offices as appropriate to include baseline data for new measures to ensure that proper targets are selected, as well as to ensure that readers understand the reasonableness of targets.

2.3C The Strategic Planning and Management Controls Division coordinate with the Office of Field Programs and other offices as appropriate to continue improving performance measure

targets. Targets should be achievable, but challenging, and require significant improvements. Establishing targets that are not challenging or not based on existing data does not encourage maximum effort from Agency employees.

2.4 BUDGET LINKS, MANAGEMENT CHALLENGES, EXTERNAL FACTORS, VERIFICATION AND VALIDATION OF DATA, AND PROGRAM EVALUATIONS

Section 2.4.1 covers the connection between the Agency's budget and its GPRA reporting. Section 2.4.2 addresses Management Challenges, Section 2.4.3 assesses External Factors, Section 2.4.4 discusses Verification and Validation of Data (V&V), Section 2.4.5 assesses Program Evaluation, conclusions are presented in Section 2.4.6, and recommendations presented in 2.4.7

The Performance Report and Performance Plan should contain information concerning evaluations, management challenges and external factors affecting progress, and verification and validity of data. The 2004 Performance Plan and 2002 Performance Report provided a substantial amount of useful information in these categories and receives an overall rating of "fair". However, in some areas, there are major gaps in the type and quantity of information provided. The Agency receives a "Good" rating for Management Challenges and a "Poor" and/or "Fair" rating in each of the other three categories. Exhibit 7 summarizes the ratings.

Exhibit 7. Summary of EEOC Ratings for Management Challenges, External Factors, Verification and Validity of Data, and Program Evaluation

C A T E G O R Y						
	Budget and Reporting Links	Management Challenges	External Factors	Verification and Validity of Data	Program Evaluation	Overall Rating
2004 Plan	Fair	Good	Poor/Fair	Poor/Fair	Fair	Fair
2002 Report	Not Applicable	Good	Poor/Fair	Poor/Fair	Poor/Fair	Fair

Notes: Good = almost always met standard/criteria
 Fair = often met standard/criteria
 Poor = usually did not meet standard/criteria

2.4.1 Links Between EEOC's Budget and its GPRA Reporting

EEOC has begun to establish necessary linkages between its budget and its performance. However, the linkage lacks several useful details. The 2004 Performance Plan contains a modest amount of linkage. For example, budget and GPRA performance information is supplied for the category "Comprehensive Enforcement Program." However, the amount of

funding for a set of activities or performance measures within the category (i.e., "Prevention of Employment Discrimination") is not provided.

OMB guidance states that a performance plan should display "the amount of funding being applied to achieve the performance goals and indicators for that activity." Annual Performance Plans should link directly to an agency's budget. Such linkage shows the results an agency intends to achieve with the funds requested. According to the Director, SPMCD, the new and planned systems, including Integrated Mission System and Integrated Financial Management System will provide data that will be helpful in this regard. For example, the IFMS should provide improved cost allocation data, a feature useful in linking budget with performance.

2.4.2 Management Challenges

Mission critical management challenges and program risks must be addressed in order to help improve the performance of any agency. An agency's performance plan should set performance goals concerning major management problems. The 2004 Performance Plan received a "Good" rating in this category because several management challenges are discussed in detail.

Most of the top management challenges (as identified in the OIG's Inspector General Assessment of Management Challenges, November 2003) facing EEOC are addressed in the Plan:

- workforce repositioning
- strategic management of human capital
- financial performance
- budget/performance integration
- competitive sourcing
- E-government

For example, several human capital issues are addressed in the plan, including linking strategic goals to employee performance and improving employee knowledge and skills. The 2004 Performance Plan is an improvement over previous Performance Plans, because human capital issues are addressed in greater detail and the Information Resources Management Strategic Plan uses timeliness as a factor in accomplishment of key objectives.

However, identifying the specific management challenges is difficult, because many of the challenges are implied in the "Program Highlights" sections that follow presentation of each strategic objective. The 2004 Performance Plan does not contain an identifiable section for Management Challenges and External Factors.

2.4.3 External Factors

The 2004 Performance Plan received a "Fair" rating in this category because several external factors are noted and discussed in moderate detail. EEOC has made significant progress from previous plans by noting additional external factors into its analysis. Review of external factors (e.g., demographic changes and public opinion) assist decision makers to assess the likelihood for achieving goals and actions needed to attain goals.

The introduction to the 2004 Performance Plan notes an increase in workload and complexity caused by passage of the American with Disabilities Act in 1990 and the aging workforce. The Performance Plan also clearly explains how the Agency is managing, and plans to continue to manage and mitigate, these factors. Several other external factors, such as demographic trends and technological advancements, are also mentioned. The 2004-2009 Strategic Plan notes several additional external factors.

2.4.4 Verification and Validation of Data

The Performance Plan and Report describe verification and validation (V&V) efforts broadly, but the reader cannot determine if existing verification and validation procedures are credible. Presenting credible performance information is necessary to adequately assess progress towards agency goals. Decision makers, inside and outside the Agency, need assurance that program and financial data is timely, complete, accurate, useful and consistent to make well-informed decisions.

The Performance Report for each Agency should contain a comparison of actual performance with performance targets identified in the Performance Plan. In addition, GPRA requires the Performance Plan to include a description of the means used to verify and validate measured values. For the Performance Report to be useful, the reported target data must be accurate and supported adequately.

Verification is the checking or testing of data to lessen the risk of erroneous data. Validation means the testing of data to ensure significant bias is not created by errors. Significant error, including bias, reduces the ability to assess the extent to which performance goals are achieved.

Validation and Verification Reporting

The 2004 Performance Plan and 2002 Performance Report contain adequate descriptions of several validation and verification efforts. However, no overall statement or details about the current reliability of the performance data is provided. Therefore, the Agency has not provided sufficient information to allow the reader to judge whether existing data is sufficiently free of bias and other error. This makes it difficult to judge if the Agency is meeting performance targets and goals. The 2002 Report noted that EEOC is making progress in implementing technology that are critical for data collection and verification. The Director, SPMCD, stated

that in order to adequately verify and validate much reported data, the new systems need to be implemented. This indicates that much of the data currently reported is neither verifiable nor can it be validated.

Implementation (recently accomplished and/or soon to be accomplished) of several tools is noted, including:

- issuing Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the U.S. Equal Employment Opportunity Commission
- Integrated Financial Management System Plans for various improvements need to have dates associated with them, so that readers can assess progress in meeting V&V goals. One ongoing V&V effort not noted in the GPRA reporting is the quarterly reconciliation of private sector charges.

Support for Performance Results

For each of the two performance targets, the supporting data and manner in which the results were reported were generally accurate. Data reported for Performance measure 1.1.3 (cited in the 2002 Performance Report) are supported by a spreadsheet that details each case that contributed to the results. Data for Performance Measure 3.3.5 are supported by data generated by the government agency to which EEOC contracts the work.

For information on gathering of baseline data that can support data validation and verification efforts, see Section 2.3.2.

2.4.5 Program Evaluation

The 2004 Performance Plan shows a modest improvement from previous Plans. The 2004 Plan demonstrates that EEOC conducts a limited program evaluation effort, but understands their importance and intends to increase evaluation efforts.

The 2004 Plan describes a variety of evaluation efforts, including the efforts of EEOC, GAO, and the OIG. The 2004 Plan also notes planned studies of Alternative Dispute Resolution initiatives and training provided through the revolving fund. EEOC states that these studies would include customer/participant satisfaction. This type of evaluation can be highly effective in determining if stakeholder concerns are being met.

However, as in previous Plans, there is no schedule of evaluations or presentation of results. The Director, SPMCD, stated that EEOC has not yet committed to the type and timing of evaluations. In addition, the 2004 Plan does not state the results from program evaluations, making the program evaluation section only somewhat useful. OMB and GAO guidance call for stating evaluation results. To integrate evaluation into performance reporting, the results and actions resulting from evaluations should be included in the Performance Plan.

Some of the program evaluation efforts cited in the 2004 Performance Plan are components of program evaluation activities, not program evaluations. In general, these efforts appear to be useful, though not a substitute for program evaluation as envisioned under GPRA. For example, review of outreach reports, and participant evaluation forms are included in program evaluation reporting by EEOC. These types of reviews are not program evaluations, though they may contain useful data and analysis.

Reporting on program evaluation is required. The Performance Report and Performance Plan may include:

- summary of findings and recommendations of program evaluations
- adjustments to program evaluation schedules
- information on how interested parties may obtain copies of program evaluations

Program evaluations are important in determining whether an agency is achieving desired results and outcomes, the factors affecting performance and opportunities for improvement. In addition, program evaluations can be used by the Agency to identify the degree and/or amount that its efforts are contributing to results and what actions the Agency may take to better accomplish its goals.

Under GPRA, program evaluations are assessments, through objective means, of the manner and extent to which programs achieve their objectives. Therefore, all program evaluation efforts in the GPRA context should be designed to:

- assess, objectively, the target program or activity
- link directly to EEOC's GPRA goals and objectives
- contain assessment of results/outcomes and effectiveness (rather than resources expended)
- be useful to EEOC stakeholders

The 2004-2009 Strategic Plan shows promise for improving Agency performance reporting. The Strategic Plan includes both descriptions and a schedule of program evaluations. This is the type of information, along with results from evaluations, that should be included in future performance reporting.

2.4.6 Conclusions

Conclusion 2.4.6a: Existing links between the budget and performance goals and activities should be improved.

Conclusion 2.4.6b: Management challenges and external factors should be clearly identified and addressed. The 2004-2009 Strategic Plan includes information that could be included in subsequent performance reporting documents.

Conclusion 2.4.6c Reported Validation and Verification activities are not adequate. Developing stronger data reliability efforts would significantly improve the Performance Plans and Performance Reports, and increase the ability of EEOC to improve performance.

Conclusion 2.4.6d EEOC recognizes that program evaluation activities and reporting need improvement. Conducting a limited number of formal program evaluations could provide the Agency management with critical information about outcomes and processes, while also satisfying the intent of GPRA. The current schedule of evaluations (as included in the 2004-2009 Strategic Plan), should be included in subsequent performance reporting documents. The progress and results of evaluations, and deviations from the evaluation schedule should be noted and explained.

2.4.7 Recommendations

OIG recommends the Director, Office of Research, Information and Planning ensure that:

2.4A Subsequent Performance Reports show increasing links between the budget and performance goals and activities. OMB guidance (OMB circular No. A-11) provides various and flexible options for achieving closer links. EEOC could plan for particular improvements with each year's submission of the Performance Plan.

2.4B Agency GPRA products clearly identify and discuss all major management challenges and external factors. Identifying and obtaining pertinent information regarding the challenges will require annual input from, and discussion among, the Office of the Chair and Senior Agency managers in the field and headquarters.

2.4C The Strategic Planning and Management Controls Division include in the EEOC Performance Report and Performance Plan general descriptions of current methods and procedures in place for ensuring lack of significant error rate, and problem with the procedures. If no such procedures are in place for key data, this should be reported as well. This will ensure that the reader can fairly judge whether current performance data will be free of bias and other significant error. In doing so, the Performance Plan and Report should disclose fully all target data limitations. This may require revising the Performance Data Call Letter to include requirements for inclusion of data limitations.

2.4D EEOC include the program evaluation schedule, deviations from the schedule, and program evaluation results in subsequent performance reporting products. We note that effective program evaluation require significant resources. These resources may take the form of additional resources (such as for a new contract awarded to a consulting firm), and/or a redistribution of existing resources (such as ORIP or OIG using existing staff). The GAO report GAO-03-454, Program Evaluation—An Evaluation Culture and Collaborative Partnerships Help Build Agency Capacity, notes that various strategies may overcome the impediments of constraints on spending and restrictions on federal information collection. These include collaborative partnerships and expert and peer reviews.

3.0 MATTERS FOR CONSIDERATION, CONTEXT OF RECOMMENDATIONS, AND EVALUATION FOLLOW-UP

This section provides matters for consideration that are based on the conclusions taken as a whole. In addition, the context of the recommendations and evaluation follow-up information is provided.

Matters for Your Consideration

OIG recommends that the Director, Office of Research, Information and Planning establish a partnership with one or more similar agencies to improve performance planning and reporting. Partnerships are a systematic method for mutual learning and discussion of issues of common concern. It could be particularly beneficial to partner with an agency that performs similar activities (e.g. case processing and mediation). For example, experiences in developing goals and performance measures could be mutually beneficial. In addition, various methods for verifying and validating could be discussed in an environment that allows for a full discussion. Forums such as seminars and large group meetings do not typically allow for these discussions and similar benefits. Finally, EEOC could benefit from shared resources. For example, program evaluation resources could be shared, providing greater efficiency.

Context of Recommendations

All recommendations in this report are intended to prompt key actions that will result in significantly improved performance planning and/or reporting. The recommendations are not intended as short term prescriptions that will result in a flawless performance plans and reports. Instead, the recommendations are meant to provide several key milestones that should be met in EEOC's evolving effort to make GPRA an increasingly useful tool for EEOC and those who need to assess EEOC's accomplishments.

To successfully implement some recommendations in this report, changes to various EEOC performance reporting and planning processes may be needed. Therefore, ORIP will need to work over an extended period of time with other offices to make those process changes. Primary offices involved in these efforts may include Office of the Chair, Office of the Chief Financial Officer and Administrative Services, Office of Federal Operations, Office of Field Programs, Office of Human Resources, Office of Information Technology, and the Office of Legal Counsel.

ORIP comments on the OIG's draft 2002 report stated that ORIP does not implement or directly control GPRA planning and implementation, therefore, recommendations in the report cannot be effectively carried out or resolved by ORIP. However, ORIP is responsible for EEOC's GPRA reporting efforts and therefore should be the lead office for recommendations. To ensure that ORIP has support in implementing recommendations that fall outside of ORIP's authority, OIG believes that the Office of the Chair should provide all necessary support to ORIP.

We understand that implementing some changes may take a considerable period of time and require redeployed and/or additional resources, as well as extensive coordination and cooperation with other EEOC offices. This condition does not eliminate the need to make the changes. Other changes, such as those regarding report accessibility, require a minimum of resources and coordination and should be implemented in the upcoming reporting cycle (2003 Annual Report and 2005 Annual Plan).

We note that while the new strategic plan will result in new performance measures, most of the recommendations in this report will not be affected (e.g., report presentation and accessibility).

Evaluation Follow-up

The Office of Management and Budget issued Circular Number A-50, Audit Followup, to ensure that corrective action on audit findings and recommendations proceed as rapidly as possible. EEOC Order 192.002, Audit Followup Program, implements Circular Number A-50 and requires that, for unresolved recommendations, a corrective action workplan should be submitted within 30 days of the final evaluation report date, describing specific tasks and completion dates necessary to implement audit recommendations. Circular Number A-50 requires prompt resolution and corrective action on recommendations. Resolution should be made within six months of final report issuance.

In response to the 2002 draft report, ORIP objected to use of audit follow-up for some of the draft recommendations, noting that some recommendations required cooperation with other EEOC offices and that audit resolution and actions to implement recommendations could be difficult. While agreeing to actions that will be taken, and taking those actions, can be difficult, improving EEOC performance reporting will greatly benefit EEOC's stakeholders.

APPENDIX A: Acronym List

CFO	Chief Financial Officer
DoJ	Department of Justice
DoL	Department of Labor
EEOC	Equal Employment Opportunity Commission
FY	Fiscal Year
GAO	U.S. General Accounting Office
GPRA	Government Performance and Results Act
IG	Inspector General
OIG	Office of Inspector General
OMB	Office of Management and Budget
ORIP	Office of Research, Information and Planning
SPMCD	Strategic Planning and Management Controls Division
V&V	Verification and Validity

Appendix B: Office of Resource and Information Planning Comments and OIG Response

SUMMARY:

OIG thanks ORIP for its timely response to, and detailed observations about, the our draft report. We are pleased that you believe it provides useful material to improve the Agency's GPRA products. We have made changes, as appropriate, to the report. Our responses to your comments can be summarized in the following manner:

- Our assessment focuses on EEOC performance reporting, not strategic planning, therefore, EEOC can improve its reporting by improving weakness found in the most recent annual performance plan and report
- If OIG fails to issue a final report, as you recommend, it would harm, not help, EEOC in its efforts to report performance information in a timely and efficient manner—other agencies have implemented plans to address their OIG's recommendations regarding performance reporting
- OIG disagrees that the scoring system used in the draft report is inadequate, as a result, no changes have been made
- OIG has taken into account EEOC's strategic plan (issued after the draft report) in the final report—while this does not affect our findings, several of the recommendations are no longer required

For details on these and other issues, please see OIG responses (*in italics*) following the relevant ORIP comment below. Your memo indicates you may have further comments. We believe these additional comments may assist OIG in assessing future performance reports, and we encourage you to send your comments to OIG at your earliest convenience.

Office of Research,
Information and Planning

ORIP'S COMMENTS AND OIG'S RESPONSES

October 15, 2003

MEMORANDUM

TO : Aletha L. Brown
Inspector General

FROM : Deidre M. Flippen
Director, Office of Research, Information and Planning

SUBJECT : ORIP Review and Recommendations of the OIG's Draft Report
No. 03-14-AMR, *Evaluation of EEOC's Performance and Results
Reporting*

Thank you for the opportunity to review the OIG's draft Report No.03-14-AMR, *Evaluation of EEOC's Performance and Results Reporting*, submitted to me with your memorandum dated September 24, 2003. In the interests of time, I have only focused on several major areas of the report, even though I may have comments to offer in other areas. Also, to put my comments and recommendations in context, I offer preliminary observations about the EEOC's strategic planning process and the significant enhancements we have made since the Chair's arrival.

Enhancing the Agency's Strategic Planning Environment

The EEOC has issued three Strategic Plans since passage of the Government Performance and Results Act of 1993 (GPRA). The most recent one was issued on October 1, 2003, and covers fiscal years 2004-2009. Each of the agency's Strategic Plans governed the formulation of our Annual Performance Plans and our subsequent reports. In recent years, we have made progress in developing a Performance Budget to integrate our yearly performance plan with our budget submission and meet the requirements of the President's Management Agenda. Finally, for the first time this year, the agency is required to submit a Performance and Accountability Report, which will integrate our GPRA Annual Program Performance Report, the agency's annual financial statements, and the annual assurance about the adequacy of our management controls. This history illustrates the accelerating pace for fully upgrading and integrating GPRA's strategic concepts with the agency's management of its financial and other resources.

Our Strategic Plan for Fiscal Years 2004 - 2009 sets the stage for dramatic improvements we must make over the next few years. For instance, the Plan was already used to prepare the fiscal year 2005 Performance Budget we submitted to the Office of Management and Budget in September.

In addition to restructuring the Plan around the agency's Five-Point Plan, it contains two major improvements from our earlier plans. For the first time, the Strategic Plan includes performance measures, including measures of public/customer confidence by using surveys to collect critical data. These measures track 6-year targets to achieve specific results over the life of the Plan. Before the current Plan, the agency's Annual Performance Plan was the only GPRA document that contained measures, and they only forecast one-year targets. The majority of the Strategic Plan's measures are new and more "outcome" focused, in light of the requirements in recent years throughout government. Previously, most of our measures were activity-based or "output" measures. Also for the first time, we have included in the Plan a schedule of program evaluations we will conduct to assess program results.

OIG response: Our assessment focuses on EEOC reporting of performance, not on strategic planning. We are pleased that the Strategic Plan now includes elements previously absent or inadequately addressed. It will be useful that these, and the changes recommended by OIG in this report, are included in EEOC's future performance reporting documents.

Comments in Response to OIG's Report

I address several common themes in the OIG Report with my observations in mind:

- The value of OIG findings and recommendations are unfortunately diminished, when its reviews of GPRA documents and implementation efforts are delayed. For example, the current OIG report only briefly acknowledges the new Strategic Plan. Its adoption and implementation dramatically effects the usefulness of the report's findings and recommendations, however. The Plan's new framework, the inclusion of outcome measures, and the incorporation of a program evaluation schedule needed to be considered, because they would have affected the report's evaluation and assessment of our GPRA process and presentation.

On page 2, the report states: "We note that while a new strategic plan is in development and will likely result in new performance measures, many of the following recommendations will not be affected (e.g., report presentation and accessibility)." [underline added] We do not agree with this statement. In our opinion, 8 of the 13 recommendations² are no longer relevant and should be significantly reevaluated based on the new Strategic Plan.

² The 8 recommendations are: 2.2A, 2.2C, 2.3A, 2.3B, 2.3C, 2.3D, 2.4B*, and 2.4D (*recommendations 2.4A and 2.4B in the summary on page 3 do not agree with the descriptions on page 26. We used the description of 2.4B on page 26.)

The new Strategic Plan was developed over the past year by two cross-organizational teams, with OIG participating on both teams. Although finalized this past September, the Plan's basic structure and most of the performance measures were in place in sufficient time for the OIG's review to have considered them as part of this assessment. Because of the dramatic changes made in the Plan, we can not use the OIG's report effectively to improve the GPRA program.

The product has not been delayed and therefore its usefulness is not diminished. In fact, by taking into account the final strategic plan, our assessment is fully up-to-date. Our recommendations are intended to be useful not only for the current performance reporting cycle, but beyond. Several of the recommendations could well take longer than the current reporting cycle to implement.

*Our assessment focuses on the **existing** performance reporting, not on **planned** reporting), because we believe that in order to see where one is going, one needs to know where one has been. Without a baseline assessment of **actual** annual performance reporting, assessments would necessarily focus on process and long-term planning. Both of these are useful, but fundamentally different types of assessments. The current Strategic Plan is not relevant to our assessment of previously issued annual plans and annual reports. It is, however, relevant in helping construct useful recommendations for improving future performance reporting documents.*

For these reasons, the issuance of a new Strategic Plan does not diminish the need to improve EEOC's performance reporting. The Strategic Plan contains some new performance measures scheduled for implementing in 2004. However, our review focused on the performance reporting conducted by EEOC for the 2002 (performance report) and 2004 (performance plan). This reporting is linked to the 2000-2005 Strategic Plan. Because our review focuses on performance reporting, the structure of the new Strategic Plan (in draft or final form) was not assessed.

Regarding OIG input to the 2004-2009 Strategic Plan—The OIG review of the draft strategic plan, and its contribution to the Strategic Planning Working Group were efforts that stand apart from this report.

- I am also concerned about the “scoring” technique used in the report. The technique is too subjective since it does not use a balanced scale, there is no detailed discussion to support a particular score, and it is not evident if, or how, individual criteria were weighted to determine an overall score. *See OIG response following the detailed comments on scoring for a discussion of the balanced scale we used in this assessment.* The OIG Report references three sources that were used to develop standards applied to the scoring. The General Accounting Office's *Guide*³ incorporates the concepts

³ The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans, GAO/GGD-10.1.20, (April 1998)

contained in Part 2 to OMB Circular A-11, suggesting it may be the most useful document to reference for the purpose of this review.

*OIG Response: We developed a set of standards that incorporates elements for assessing performance documents from Mercatus, GAO, and OMB. However, we did **not** adopt GAO's conceptual framework for evaluating GPRA documents, but adopted a more balanced framework and an approach that reflected this balance. While we found GAO concepts helpful, our framework and methodology does not mirror GAO's (or Mercatus's). Therefore, we should not follow suggestions based primarily on GAO documents. A discussion of GAO and other guidance follows.*

As we developed our own assessment and scoring framework, we found that GAO's guidance is useful, but not the only useful guidance. The Mercatus Scorecard is also widely recognized as useful in assessing performance reporting. For example, current and former members of Congress (e.g., Hon. Todd Platts, Chairman, House Government Reform Subcommittee on government Efficiency and Financial Management), agency heads (e.g., Sec. of Labor Elaine Chao), and various experts view Mercatus assessments as useful. GAO referred to a Mercatus assessment when reviewing the General Services Administration's performance. GAO also solicited comments from Mercatus when developing its own 2003 performance and accountability report. Therefore, we did not change scoring to more closely reflect GAO's conceptual guidance.

The *Guide* describes a conceptual framework to help evaluate GPRA documents, and it provides an example of a scoring technique. GAO's approach illuminates my concerns with the report's application of the scoring technique. For example, GAO cautions that the *Guide* was developed for a "general" assessment. To amplify this point, the *Guide* notes that evaluators should assess individual criteria within three broad categories, framed as questions, but combine these assessments into an "overall judgement about what level of progress the plan as a whole represents...." (Page 11) GAO further elaborates that "[s]coring the plans by tallying up the instances of compliance—for example, by counting the number of performance measures that were clearly linked to the strategic plan—is not recommended. Rather, in this example, the concern should be that, if there are no performance goals specified for a given strategic goal, or if there are a large number of performance goals with no visible link to the agency's strategic plan, then there should be an explanation of those exceptions." (Page 12)

GAO only applies its "scoring" system to a combined assessment. In contrast, the technique in OIG's report scores individual criteria. The GAO does not recommend "scoring" individual "criteria" but to focus, instead, on an overall assessment.

OIG response: In addition to our comments above regarding our balanced approach compared to GAO's, we believe that efficient improvement of overall performance reporting cannot take place without improving individual elements. Therefore, identifying elements to improve is critical. It follows that without grading of these elements, it would be difficult to justify recommendations for improving those elements. The GAO Guide, as you point out, is intended

as a general assessment of the performance plans, while our objective was to convey both overall and specific assessments, of both the annual plan and the annual report. Therefore, we use several scoring standards, both GAO and non-GAO. In appropriate cases, in order to document and support a rating, we quantified instances where criteria was met or not met. It is considered acceptable to quantify instances of compliance with reporting criteria:

- *OIG of The Securities and Exchange Commission’s document “GPRA Performance Reports,” March, 2002*
- *OIG of the Federal Communications Commission, “Report on Audit of the Federal Communications Commission Implementation of the Government Performance and Results Act (GPRA), March, 1999*

Also, the scoring used in the OIG report does not represent a balanced scale. Two of the three gradations (Poor and Fair) are usually associated with a “below average” assessment and have a negative connotation. The remaining one (Good) is usually associated with an “average” assessment and is not considered the top of a linear, three-point scale. For example, the three points of a three-point scale could be Inadequate, Adequate and Excellent to cover the full range of possible assessments. Although we do not think a scoring approach should be used at all, particularly at the individual criteria level, we would suggest that a five-point scale would be more appropriate (Inadequate, Weak, Adequate, More than Adequate, Excellent). GAO’s example in the *Guide* (“generally meets,” “partially meets” and “falls well short of meeting”) also could be considered as a more appropriate scale for these types of assessments. However, as GAO recommends, any scale should only be used for an overall assessment and not individual criteria.

OIG Response: We disagree, the scale we use is balanced. The scale has one positive rating, one neutral rating, and one negative rating. The word “fair” is defined by Western New Collegiate Dictionary as “sufficient but not ample: ADEQUATE.” [emphasis is Western] Therefore, there is one positive rating, one neutral rating, and one negative rating. We provide a more detailed definition of “fair” throughout the report: often met standard/criteria. Therefore, it should also be clear to readers that “fair” is not a negative rating.

In addition, “average” is defined as a level typical of a group, class, or series, (i.e., a comparison to others). We did not compare EEOC’s performance reporting to that of other agencies—we feel this would be extremely time consuming and minimally useful. Instead, OIG compared EEOC’s reporting against well-established criteria.

Finally, “excellent” should be used on scales with more than three ratings. “Excellent” and “failing/unacceptable” are not included because we chose a three point scale so that readers could easily and quickly grasp where EEOC rates. A three point scale simply places all grades above fair into one category and similarly places all grades below “fair” into another. This means there are no “excellent” or “failing” scores, but general categories indicating performance less than or better than adequate. Therefore, even if we had used included “excellent” and “failing,” it would not have changed the results of the assessment.

Some organizations use three point scales, some use four or five point scales, some use multiple scales. For example, the SBA Office of Inspector General uses a three point scale to assess the usefulness of performance measures, as does the Presidential Management Agenda to assess results. Neither scale is inherently superior because a three point scale is simpler to grade and comprehend results, while a five point scale provides more depth. Future evaluations may include a scales with more than three levels for added depth.

In addition to the scale used, I am concerned about other aspects of the scoring technique. It is not clear how a specific “score” was determined. We recognize that judgements are involved in selecting a score, however, there is no descriptive section or attachment in the report to elaborate on the factors used to determine a particular score. GAO provides lengthy descriptions so the reader can better understand how the *overall* assessment was determined.

OIG Response: The assessment uses criteria found in GAO and Mercatus publications. Each specific score (e.g., for accessibility) was determined by comparing what was reported to the criteria. We often cite examples to illustrate why EEOC performance reporting does or does not meet the criteria. The assessment is intended, in a concise manner, to present findings, conclusions, and recommendations. Future assessments could include detailed appendixes such as those you describe.

Also, it is not clear whether individual criteria was weighted, or appropriately weighted, to determine an overall assessment score. As GAO notes in its *Guide* on page 11, “[i]n assessing progress towards the ideal [performance plan], evaluators should also recognize that some deficiencies are more important than others, and that an unsuccessful agency effort to address a particularly challenging task shows greater progress towards accomplishing the Act’s [GPRA’s] goals than does not having attempted the task at all.” In the report’s assessment whether any weighting was used by answering the following questions: Was a deficiency less important in the overall scheme? Was the observed deficiency a result of the agency’s unsuccessful attempt to try to implement the criteria or did the agency not try to implement at all?

*OIG Response: Our **overall** assessment of EEOC’s performance reporting is provided in both the draft and final product, on page 1 of the executive summary and on page nine of the final report). To support such an overall assessment, we scored individual criteria, used the individual criteria score to produce an overall rating for each category, then assessed category performance to determine an overall assessment. Please note that the overall assessment is our judgement and not a “grade.” Rather, the overall assessment, notes positive and negative aspects of EEOC’s performance reporting, highlighting areas for improvement.*

In our opinion, the report suggests that each criteria has equal weight. This is a critical problem with the scoring technique. For example, for the six criteria assessed on page 8 for “Organization and Other Practical Aspects” (2.1), the 2004 Plan received 4 “Good” scores, a “Fair” score, and a “Poor” score in *Accessibility*. The “Overall” assessment, however, is “Fair;” apparently based on the judgement that the Plan was not

electronically accessible on the agency's web site. In fact, the Plan was accessible in other ways, which was not acknowledged. There is no discussion about how GAO's two areas for properly discussing the weighting of a particular area factored into the overall assessment. Was the deficiency less or more important than the other areas assessed? Did the "agency" initiate attempts to electronically post the Plan but, for a variety of reasons, was unsuccessful? Or, did it not try to post the Plan at all? The answers to these questions are not addressed in the report. It appears that this "deficiency" may have disproportionately influenced the overall assessment. This is just one example of our concern with the construction and application of the scoring technique used in the report.

OIG Response: The overall assessment for each major category (e.g., Organization and Other Practical Aspects) is based on the judgement that each criteria is vital to that category, therefore, a "Poor" rating in one criteria would make it difficult, (given there are only six criteria in the category), for the overall rating to be above "Fair." Recall that "Good" means criteria were almost always met. We stress that while a category's overall rating is noteworthy, improvement can occur only if the individual criteria show improvement. It is not our intention to rate criteria that are not extremely important. Therefore, we did not assign a given weight to each criteria, but instead made a judgement about a category's overall assessment.

*To restate: this report assesses performance reporting **results**, rather than **efforts** at performance reporting. From this, an outcome/results-based viewpoint, whether EEOC attempted to post a report or take other reporting is not vital.*

*We defined accessibility as readily available Performance Reports and Performance Plans. This is very similar to the Mercatus definition. Because timely electronic posting provides readily available documents and most citizens have access to the web (in their homes or public libraries) other systems for distribution to the **public** are of marginal importance. Because EEOC did not perform well in either of these areas, the results in this criteria were very low and thus received a rating of "poor." Given the low-cost of posting documents, prompt electronic posting to the public website is a valid measure for this criteria. Finally, to discuss each rating for each criteria and category at the level of detail you describe would be extremely expensive, detract from the results-oriented report we hope to provide, and result in a voluminous, less timely, and therefore, less useful report.*

- Finally, we have raised before our concern about using the OMB Circular A-50, *Audit Followup*, and the EEOC Order 192.002, *Audit Follow-up Program*, in situations similar to these types of OIG efforts that, we believe, do not fall within the purview of audit followup. I feel that working together in a collaborative effort to refine the GPRA process and to develop our GPRA products would be more beneficial than having to evaluate and respond to individual recommendations through the cumbersome processes established for audit followup. Although we may not fully endorse all of your recommendations, we feel it would be more informative and useful to the agency to discuss findings and recommendations with a more flexible approach.

OIG Response: The audit-follow up process is well established, and is appropriate to all recommendations contained in this report. This issue is discussed in the Recommendations section.

Recommendations

The following recommendations provide a good opportunity to use the OIG's Report No. 03-14-AMR, *Evaluation of EEOC's Performance Reporting*, to support a continuous process of improving the agency's strategic planning endeavors.

- *Do not issue the report at this time.*

*OIG Response: Failing to issue a final report would not support improvement of agency performance reporting. As you point out, "[the draft report] provides useful material to improve the agency's GPRA reports." We stress that the report does **not** focus on "strategic planning endeavors," but on performance **reporting**. OIG's publish performance report assessments at various times in the calendar year—we would like to explore with you an optimal report issuance schedule.*

The report does not address the significant impact the new Strategic Plan has already had on our GPRA and budget documents. At least 8 of the 13 recommendations are no longer relevant (see footnote 1). It would be valuable for the OIG to review the new Strategic Plan so that the agency can benefit from its observations and recommendations as we move forward with its implementation and its effect on our other GPRA and budget documents in the future.

*OIG Response: Our review focuses on the performance reporting contained in 2004 Annual Plan and the 2002 Annual Report. Your comments do not specify which GPRA documents have already been impacted by the Final Strategic Plan. Regardless, because the scope of our review covers only documents issued **prior** to the Strategic Plan, our analysis of these documents is not changed by the Final Strategic Plan or documents altered subsequent to its issuance.*

However, we take into account the final Strategic Plan as relates to several conclusions and recommendations. Two recommendations were removed, and one was modified as a result of your comments and assessment of the Final Strategic Plan. For example, the program evaluation conclusions and recommendation were modified because the Strategic Plan contained an evaluation schedule). In addition, we plan to review the entire final Strategic Plan as part of an upcoming review.

- If a report is issued, a different scoring technique and scale need to be used.

If the report is issued, it is important to alter the scoring technique. The report should not score assessments of individual criteria. Even some of the categories should not be scored separately. Instead, they could be combined into overall assessments. The rating scale needs

to be changed to reflect a more appropriate range. The report should provide explanations for distinctions made in the assessments and scores. In particular, scores should be appropriately weighted to reflect the relative importance of different criteria and allow for agency efforts to address particular criteria, as noted by the GAO.

OIG Response: The scoring system has not been altered. Your concerns regarding scoring are addressed in OIG comments earlier in this appendix. No scoring system is perfect, however, we believe ours is straight forward and points clearly to specific areas for improvement. Many different scoring systems have been used to assess GPRA documents in the federal government. We used a system that simple to administer and easy for readers to comprehend the results. We will review our scoring system. Future assessments may be more sophisticated, as knowledge of assessing performance reporting increases and EEOC performance reporting improves.

- Remove audit follow-up procedures for this type of evaluation and these recommendations.

This type of report can provide useful guidance to improve the agency's GPRA reports. The report acknowledges that many of the changes will take a long time to have an effect. This type of evaluative work is not an audit and is not conducive to corrective action plans. For a variety of reasons, there may be concerns with implementing some of the recommendations. Under audit followup procedures, valuable time and resources are often required to resolve outstanding issues; particularly, where judgements are involved. It is important to encourage collaborative efforts to improve GPRA plans and approaches, which evolve and can only be assessed over time.

OIG Response: While collaborative efforts are vital to improving agency GPRA reporting, we believe that implementation of recommendations will be most efficient, effective, and can be tracked more accurately with the established follow-up procedures. When assessing GPRA reporting, other OIGs issue recommendations and work with the agencies using the same type of process used for traditional audits (e.g. an EPA OIG report assessing performance measures noted that the agency developed a corrective action to implement the report's recommendations). We will be happy to discuss, as appropriate, any concerns you may have.

Thank you again for this opportunity to comment on the draft of OIG's report. It provides useful material to improve the agency's GPRA products. We look forward to working with you in a flexible framework to refine these products; ensuring that their presentation continuously improves.

c: Leonora L. Guarraia
Chief Operating Officer