

EEOC FORM  
715-01 PART I

*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT  
EEO Plan To Eliminate Identified Barrier**

**FY 2013 – Bank Examination and Oversight Commission**

**STATEMENT OF CONDITION  
THAT WAS A TRIGGER FOR A  
POTENTIAL BARRIER:**

Provide a brief narrative describing the condition at issue.

Black female auditors filed a class discrimination complaint against the agency based upon failure to promote to the senior grade levels.

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

Met with Black Special Emphasis Program Manager, who talked about changes to the Auditor career track that may have limited advancement opportunities for Black female auditors and prompted a class complaint.

The Auditor position description shows possible advancement opportunities from GS-5 to GS-13. Advancement to the GS-12 or GS-13 levels requires auditors to complete the Senior Auditor Program (SAP).

Promotion to the GS-11 Auditor position is not automatic. Auditors must satisfy education prerequisites, including having 21 semester-hour credits in accounting and 6 semester-hour credits in economics.

Table A4-2 shows that 21.13% of Black females are employed at the GS-5 grade level, 22.85% at the GS-7 grade level, 31.45% at the GS-9 grade level. These percentages fall to 5.86% at the GS-11 grade level, 4.45% at the GS-12 grade level, and 3.24% at the GS-13 grade level. There appears to be a glass ceiling for Black females at the higher grade levels.

Table A9 shows that the ratio of Black female applicants who were selected for the Auditor, GS-11 position (6.05%) was less than the ratio of those who were in the relevant applicant pool (25.81%).

Table A12 shows that the participation rate of Black females who participated in the Senior Auditor Program (2.08%) was substantially less than the ratio of those who were in the relevant applicant pool (4.33%).

Met with the Director of the Bank Examining Unit at the agency's Boston Regional Office, who chaired a committee to improve the quality of audits. On January 31, 2011, the Committee reported that Auditors who functioned well at the GS-7 and GS-9 levels did not function at the level of independence required for fully successful performance at the GS-11 level or higher. The agency changed the

	<p>promotion structure of Auditors. Auditors could be promoted to GS-12 only if they were admitted to the SAP. One of the prerequisites for admission to SAP is an MBA degree. The Director believes that the MBA requirement is necessary because the GS-12/13 positions are feeder pools for management level positions, and an MBA is vital for the career development of senior managers and executives.</p> <p>Met with a consultant who had assisted the agency. The consultant stated that the MBA degree is the best available indicator of an auditor's ability to function at the level of independence that characterizes performance at the GS-12 level.</p>
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Black females in the Auditor position have fewer developmental opportunities to progress above the grade 9 level because (1) to be promoted to the grade 11 level, auditors must have 21 semester-hour credits in accounting and 6 semester-hour credits in economics; (2) to be promoted to the grade 12 and 13 levels, auditors must possess an MBA degree and be 1 of the 48 auditors chosen to participate in the Senior Auditor Program.</p>
<p><b>OBJECTIVE:</b></p> <p>State the alternative or revised agency policy, procedure or practice to be implemented to correct the undesired condition.</p>	<p>To increase the advancement opportunities for Black females in the auditor position by (1) exploring the removal of the semester-hour credit requirements from the promotion criteria for GS-11 auditors; (2) exploring the removal of the MBA degree requirement from the promotion criteria for GS-12 and GS-13 auditors; (3) expanding the Senior Auditor Program to accept more than 48 employees.</p>
<p><b>RESPONSIBLE OFFICIAL:</b></p>	<p>Director of Human Resources</p>
<p><b>DATE OBJECTIVE INITIATED:</b></p>	<p>October 1, 2013</p>

<p><b>PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE:</b></p>	<p><b>TARGET DATE (Must be specific)</b></p>
<p>Assess whether the semester-hour requirements for the GS-11 auditor position can be removed.</p>	<p>9/30/2014</p>
<p>Determine if there is a better indicator of an auditor's ability to function independently than an MBA degree. If so, assess whether the MBA degree requirement for enrollment in SAP and promotion to grade levels 12 and 13 can be removed.</p>	<p>9/30/2014</p>
<p>Promulgate and implement the new requirements for auditors to advance to grade levels 11, 12, and 13.</p>	<p>1/01/2015</p>
<p>Explore ways to expand the Senior Auditor Program.</p>	<p>9/30/2014</p>
<p><b>REPORT OF ACCOMPLISHMENTS and MODIFICATIONS TO OBJECTIVE:</b></p>	
<p><b>TARGET DATE FOR COMPLETION OF OBJECTIVE:</b></p>	<p>1/01/2015</p>