

A Comparative Analysis of Federal Agencies' Integration of Equity and Diversity  
Practices Addressing Minority Representation in  
Senior Executive Service

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ABSTRACT

This dissertation examines how leaders explain the way shifts in leaders' responsibilities, shifts in institutional pressures, and minority representation at the Senior Executive Service level influence how they integrate equity and diversity programs in federal agencies. When federal agencies address the issue of minority representation in Senior Executive Service (SES), the degree to which leaders institutionalize diversity and equity programs is inconsistent. This study seeks to contribute to neoinstitutional theory, equity and diversity literature, and representative bureaucracy by extending the perspective beyond institutional pressures on organizations. From a micro level view, this research introduces a three-tier-level of leadership and how they integrate practices differently. There have been shifts in responsibilities and pressures over time. Using semi-structured interviews, 18 leaders explain how these shifts influence them. This research, which also includes supporting documents, seeks to contribute to neoinstitutional theory, equity and diversity literature, and representative bureaucracy, extending the perspective of how institutional pressures impact organizations to how pressures influence leaders in federal agencies.

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This dissertation examines how leaders explain the way shifts in leaders' responsibilities, shifts in institutional pressures, and minority representation at the Senior Executive Service level influence how they integrate equity and diversity programs in federal agencies. When federal agencies address the issue of minority representation in Senior Executive Service (SES), the degree to which leaders institutionalize diversity and equity programs varies. Leaders at different levels have their own motivation for how they respond to institutional pressures. There have been shifts in responsibilities and pressures over time. Using semi-structured interviews, 18 leaders explain how these shifts influence them. This research, which also includes supporting documents, seeks to contribute to neoinstitutional theory, equity and diversity literature, and representative bureaucracy, extending the perspective of how institutional pressures impact organizations to how pressures influence leaders in federal agencies.

## Dedication

Thank You Father God for pushing and encouraging me to finish.

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"Faith without works is dead."

"Vision without action is merely a dream. Action without vision just passes the time. Vision with action can change the world." (Joel A. Barker)

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## **Chapter 1 – Introduction**

This research seeks to examine how shifting institutional pressures and representation at the SES level influence federal agency leaders' integration of equity and diversity programs. This multicase study explores how institutional pressures influence the degree to which leaders integrate programs. Institutional pressures such as legal mandates, guidance, and recommendations are given to agency leaders to implement equity and diversity programs and practices. Some leaders integrate practices or make programs a part of their core function or routine, while other leaders gradually integrate practices, and some do not integrate practices at all. While there has been much examination of how institutional pressures influence organizations to implement equity and diversity practices, there is little research examining how shifts in institutional pressures influence leaders within federal agencies to integrate equity and diversity practices. Results of this study may have implications of how pressures influence the degree to which leaders integrate other practices and programs beyond equity and diversity. Additionally, this research examines how shifts in leadership responsibilities for integrating practices and how representation at the senior level influences the degree to which programs are implemented. Researchers have argued that when organizations copy programs from other organizations or when programs are created because of legal mandates, programs are separated from the core functions, which prevents them from becoming routine (Meyer, Rowan, 1977, Edelman, 1992, Kalev, Dobbin, 2006, Pitts, 2009, Tilcsik, 2010, MacLean, Benham, 2010, Edelman, et al., 2011). This can mean adopting equity and diversity practices need not lead to the outcome of incorporating

practices into work routine. Yet we find different outcomes, some leaders have incorporated their practices and others have not.

When leaders describe how institutional pressure influences the integration of practices, the outcomes are based on those who participated in this research. Each leader brought their own perspective of how influences lead to the degree practices are integrated. Inferences made in this study do not represent all leaders but how researcher understood participants' experiences and perspective. Detailed analysis in chapters four and five describe these findings.

This qualitative study conducts a comparative analysis of the integration of programs by leaders at different levels and a secondary analysis of how their agencies integrate programs. Chapter one begins with an overview of the background and context of this study. Following this is the problem statement, the statement of purpose, and the research questions. Next, this chapter includes the research design, researcher assumptions and perspective. Lastly, this chapter includes discussion of the proposed rationale and significance of this research and definition of terms used in this research.

### **Background and Context**

The Civil Service Reform Act of 1978 established the Senior Executive Service (SES) in 1979, the highest civil service position (SES Guide, 2014). For over 35 years, agencies have adopted equity and diversity practices, programs, and initiatives to address the underrepresentation of minorities in this position. Diverse workforce and diversity at the senior level may increase the effectiveness of government because individuals with diverse backgrounds might bring a different set of experiences and perspectives to their decision-making (GAO 08-609T, 2008, Riccucci, 2009). Yet, diversity without

management of programs increases conflict and reduces cohesiveness (Kelly, Dobbin, 1998). Studies suggest managed diversity increases knowledge, perspectives, ideas to enhance performance and job satisfaction, and underrepresented groups deem managed diversity as beneficial (Pitts, 2009, Olsen, Martins, 2012). Terms used in this research may have multiple meanings and connotations. Next are explanations of how various terms are defined in this research.

### **Terminology**

Underrepresented groups identified in the SES are both minorities and women. The scope of this research will focus on practices adopted and integrated to address the representation of minorities in SES. To clarify, the practices will include equity and diversity programs, practices, and initiatives designed to address minority representation in federal agencies at different levels leading to SES positions. Agency programs vary when providing initiatives for career progression to the executive level. Some executive career progression programs are designed only for feeder groups of General Schedule (GS) 14 and 15 while other programs focus on minority representation in lower grades that may lead to opportunities at the SES level. For the purpose of this study, the term minority is taken from Equal Employment Opportunity terminology meaning “a group within a country or state that differs in race, religion or national origin from the dominant group” (EEO, 2011). The racial ethnic minority groups used in this research are American Indian, Alaskan Native, Asian, Pacific Islander, African American, and Hispanic/Latino (EEO, 2011).

The term underrepresentation, as defined in 5 Code of Federal Regulations (CFR) 720.202, “means a situation in which the number of women or members of a minority

group within a category of civil service employment constitutes a lower percentage of the total number of employees within the employment category than the percentage that women or the minority group constitutes within the civilian labor force of the United States” (OPM, 2011). When referring to equity and diversity, the terms practices, programs, and initiatives are used interchangeably in this research.

The term practices in this research are referred to as equity and diversity practices. Both are used because the lines are blurred between equal employment opportunity and diversity practices (Kelly, Dobbin, 1998). Many practices used for EEO purposes are also used for diversity purposes (Kelly, Dobbin, 1998). For example, minority recruiting and career development programs that originated in EEO are often renamed when used for diversity-related programs, but they retain similar goals (Kelly, Dobbin, 1998). There are many definitions of equity and diversity. In this research, equity and diversity practices are defined as programs designed to address the demographic composition of racial and ethnic minorities in the workplace, specifically, minorities in SES positions, feeder groups (GS 14 and 15), or other minorities interested in SES positions (Roberson, 2006).

### **Background Laws and Practices: Pressures At Work Within the SES Context**

The creation of the SES position preceded the beginning of a new Administration under President Ronald Reagan in 1981. In the 1960s, prior to the Reagan administration, weak enforcement of equal employment law shifted to increased federal enforcement from 1972 through 1980 (DuRivage, 1985, Kelly, Dobbins, 1998). Employers established offices and programs to comply with EEO and Affirmative Action requirements (Kelly, Dobbins, 1998). The Reagan administration eliminated quotas and

numerical requirements which resulted in ambiguity of agency compliance in EEO requirements (DuRivage, 1985, Kelly, Dobbin, 1998). Cuts in staffing and funding at EEOC made it difficult to monitor the effectiveness of programs, while sanctions against violators weakened by newly appointed judges who opposed affirmative action (DuRivage, 1985, Kelly, Dobbin, 1998).

The effects of the decline of Affirmative Action initiatives were primarily felt in the private sector, although employment initiatives for government civilian employees weaken in similar ways (duRivage, 1985, Edley, Stephanopoulos, 1995). Despite Congressional resistance to weaken Affirmative Action and Affirmative Employment Programs, the Reagan administration shifted the responsibility of implementing programs from the Equal Employment Opportunity Commission (EEOC) to agency leadership while eliminating many legal requirements (duRivage, 1985, Edley, Stephanopoulos, 1995). From 1981 through 1985, the Administration eliminated requirements for goals, quotas, timetables, and government review, leading to private sector companies monitoring their own Affirmative Action plans (duRivage, 1985, Edley, Stephanopoulos, 1995). These changes were implemented despite the EEOC Chairman and later Supreme Court Justice, Clarence Thomas' testimony (duRivage, 1985). In 1982, then EEOC Chairman Thomas stated before the House that between 1975 and 1979 Affirmative Action made substantial employment gains for women and minorities (duRivage, 1985, Edley, Stephanopoulos, 1995) (SES Guide, 2014). Thomas state that between 1975 and 1979, women and minority representation increased by 33% in bank management, women in the electronics industry professional jobs increased by 78% and minorities by 52% (duRivage, 1985). Although Affirmative Action programs were effective, Thomas

did not support conciliation agreements that included goals and timetables (Kelly, Dobbin, 1998). These programs continued to decline under the Reagan administration and three decades later the topic of minority representation continued.

Despite the decline of Affirmative Action policies, these policies along with civil rights laws helped create equity in some jobs but it was necessary that policies and legislation be aimed at senior level positions (Ricucci, 2009). The debate on minority representation continued throughout the years with a new emphasis to address the SES position during the 111th Congress in 2009 (111<sup>th</sup> Congress, 2009-2010). Representative Danny K. Davis (D-IL) and Senator Daniel Akaka (D-HI) introduced the Senior Executive Service Diversity Assurance Act to mandate actions that address underrepresented minorities in SES (111<sup>th</sup> Congress, 2009-2010). This act was intended to improve diversity representation within and improve policy direction and oversight of the SES (111<sup>th</sup> Congress, 2009-2010). Mandates included practices such as diverse selection boards, development of plans on strategies to identify and eliminate barriers to minority advancement, and required the Director of the Office of Personnel Management (OPM) provide reports to Congress on these strategic plans and updates (Gore, 1997, Clinton, 1997, Best Practices, 1999, 111<sup>th</sup> Congress, 2009-2010). With strong Senate opposition, this bill did not pass (111<sup>th</sup> Congress, 2009-2010). The next legal mandate to address this issue since the complete elimination of affirmative employment quotas in 1987 was the 2011 Executive Order 13583, Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce, focusing more on diversity and inclusion practices in the federal government workplace (E.O. 13583, 2011). Whether Affirmative Employment Programs, Management Directives, or

diversity and inclusion initiatives, they all include similar practices (e.g. recruitment, mentoring, and succession planning) to integrate into the everyday business across all agencies (Gore, 1997, Clinton, 1997, Best Practices, 1999, ACT-IAC, 2011, E.O. 13583, 2011).

Although some practices were mandated and others recommended, response from different levels of leadership within agencies varied, as observed by the Government Accountability Office (GAO) report (GAO-03-34, 2003, GAO-04-123t, 2003). In 2003, the GAO provided a report to Congress stating the need for enhanced agency efforts to improve Senior Executive Service diversity or representation amongst minorities and females (GAO-03-34, 2003, GAO-04-123t, 2003). This report was in response to a projection made by GAO 2000 stating 56% of SES would be eligible for retirement and other attrition between 2001 and 2007 (GAO-03-34, 2003, GAO-04-123t, 2003). In response to this alarming number, several members of Congress inquired how this would affect diversity within the SES (GAO-03-34, 2003, GAO-04-123t, 2003). According to the GAO study, changes in minority representation would be insignificant if current practices for appointment to SES continued (GAO-03-34, 2003, GAO-04-123t, 2003). The 2003 report consisted of updates from agencies of various programs they either implemented or were developing (GAO-03-34, 2003, GAO-04-123t, 2003). The Social Security Administration implemented leadership development programs for employees, the Department of Energy was developing a mentoring program, and the Veteran's Administration was developing a plan for workforce management and succession planning (GAO-03-34, 2003, GAO-04-123t, 2003). Agencies were at different stages of integrating programs with varied responses to the external pressures influencing

integration. Without a follow up to this GAO report, it is unknown to what degree these agencies fully or partially integrated other initiatives such as the Candidate Development Program, a career development program designed for individuals aspiring to work at the executive level, also mentoring, and recruiting programs (GAO-03-34, 2003, GAO-04-123t, 2003).

One of several possible explanations for the various responses by agencies trying to integrate the practices is that the influence by EEO program structures, rules, and organizational policies shifted to the discretion of different levels of leadership within agencies (Kalev, Dobbin, 2006). After Affirmative Action and Affirmative Employment Programs weakened from 1981 through 1987, EEOC's ability to influence agencies' use of equity practices decreased significantly as agency leadership authority increased.

### **Shifts in Institutional Pressures and Responsibilities**

From the 1960s through 1970s, enforcement authority of equity programs was largely the responsibility of the Equal Employment Opportunity Commission (EEOC) and Equal Employment Opportunity (EEO) professionals within agencies (DuRivage, 1985, Kelly, Dobbins, 1998). In the 1980s, authority to enforce equity and diversity programs was given to senior level (DuRivage, 1985). When Executive Order (EO) 13583, Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce, was introduced in 2011, diversity programs became the focus for agencies (EO, 2011). As diversity programs took center stage over the enforcement of equity programs, senior level leaders shared the responsibility of implementing equity and diversity programs with middle managers, heads of divisions, departments, branches, and equity and diversity managers. Over time, two shifts

occurred in tandem. The shift in responsibilities occurred as institutional pressures to adopt and implement these programs shifted from less coercive to more normative and mimetic (Kim, Kalev, Dobbin, 2012). Since introducing EO 13583, the degree to which leaders at different levels in agencies have implemented practices is unknown.

What is known is agency leaders vary in the degree they adopt and integrate practices (Kellough, Naff, 2004). Evidence from Kellough and Naff's 1999 survey shows senior level leaders determine the level of integration of practices (Kellough, Naff, 2004). A lot has happened over time and relying upon interviews, reports, and surveys provides an opportunity to evaluate how senior level and other leaders influence the integration of practices. Comparative analysis is appropriate for this research to draw comparisons and understand how different levels of leaders respond to pressures or mechanisms to adopt and institutionalize practices (Jensen, Rodgers, 2001, Yin, 2003). For robustness, it is worth looking more closely where leaders within various agencies reveal more interpretation of meanings and process. Within this context, this research expects to find that not only do senior level leaders determine the degree to which practices are integrated, but also middle level leaders, and Equal Employment Opportunity Managers, and Diversity Practitioners based on different institutional pressures.

### **From Past to Present – Programs, Practices, and Pressures:**

#### **Equity-Diversity Practices and SES Representation**

Equity and diversity practices and programs have a long and highly visible history in federal agencies. Through Affirmative Action, in 1969 President Richard Nixon enforced programs in response to barriers of entry for employment of minorities

(duRivage, 1985). Studies suggest a diverse workforce brings different experiences and perspectives to decision-making, which may result in increased government effectiveness. (GAO 08-609T, 2008). Although minority representation has increased in civil service positions below the SES, similar progress has not occurred for minorities at the SES level in all agencies (OPM website, 2015). This position is the highest-ranking civil service position with two different statuses of career and non-career appointed positions (GAO Fed Workforce, 2014, SES Guide, 2014). The focus of this study is the career SES position that includes managerial, supervisory, and policy positions above the General Schedule (GS) 15 level (OPM website, 2015). One measure to indicate Equal Employment Opportunity and diversity in an agency is if we see minority groups are no longer underrepresented. As of September 2013, there were nearly 7,910 SES positions (7,190 career, 720 non-career, limited term/emergency) of which 80.12% were white, 19.84% were minority, and .04% unspecified (OPM website, 2015). Minority groups are still underrepresented in some agencies and have not reached parity since the SES position was created in 1979 (OPM website, 2015). Recently, OPM reported minority representation at the SES level remained the same in fiscal years 2015 and 2016 at 21.2%. With the creation of the Senior Executive Service (SES) position in 1979, the 1980s Affirmative Action programs included addressing barriers that prevented minorities from entering leadership positions (Edley, Stephanopoulos, 1995, SES Guide, 2014). By 1985, Affirmative Action programs decreased while goals were eliminated altogether (Edley, Stephanopoulos, 1995). With the elimination of all goals in 1987, agency leaders were appointed as decision makers to implement equity and diversity programs with reduced oversight from the Equal Employment Opportunity Commission

(EEOC) (Edley, Stephanopoulos, 1995).

Consequently, Equal Employment Opportunity Commission (EEOC) and the Office of Personnel Management (OPM) created equity and diversity directives and programs with the same intent, to remove barriers for minorities in the workplace (Edley, Stephanopoulos, 1995). All agencies have similar mandates and recommendations yet the results of adopting and integrating practices are inconsistent between agencies. In a previous survey, for example, Kellough and Naff's analysis of the 1999 NPR survey of agencies that have adopted diversity programs, of the 160 agencies and sub agencies interviewed, 46.7% reported their diversity programs were incorporated into their organizations' vision or mission statement, 49.2% reported their organization had a diversity policy, directive, or administrative order, and fewer than 27% had a specific person responsible for day-to-day operations of diversity programs (Kellough, Naff, 2004). According to Kellough and Naff, there was no clear uniformity in the presence of factors critical to the success or development of diversity practices (Kellough, Naff, 2004). In a current survey, the 2017 list of Best Places to Work For in the Federal Government, Support for Diversity category, agencies are ranked according to survey results from the Federal Employee Viewpoint Survey (Best Places to Work.org, 2017). Over 498, 000 federal employees from 410 agencies assessed diversity policies, programs, management commitment, and support for diversity programs. Agencies and agency subcomponents' 2017 rankings were from 84.1% to 45.6% (Best Places to Work.org, 2017). It is not surprising employees view support and commitment for diversity programs differently, but with both legal mandates and recommendations from EEOC and OPM, how do we account for different outcomes or different levels of

integration?

### **The Influence of Shifting Pressures: Coercive, Mimetic, and Normative**

Regardless of outcomes, all agencies respond to institutional pressures. Three pressures lead to isomorphism or agencies looking similar: coercive, mimetic, and normative (DiMaggio, Powell, 1983). This isomorphism leads to legitimacy with constituents and employees as organizations are viewed as behaving appropriately with a system of norms, values, and beliefs (DiMaggio, Powell, 1983, Suchman, Edelman, 1996). These mechanisms are not static but shift and organizations respond to a more iterative change in environment. What is viewed as legitimacy and appropriate response shifts from one era in equity and diversity to another. From 1960 to 1980, coercive pressures exerted more influence, as practices were more legal with a greater focus on equity than diversity programs. Coercive pressures on organizations result from legal mandates that includes penalties if not obeyed, such as EEO laws forcing agencies to adhere to fair hiring practices or external pressures from society to conform for legitimacy (Edelman, 1992). Mimetic pressures result in organizations copying other organizations regarded as successful when goals are ambiguous (DiMaggio, Powell, 1983, Weber, Davis, Lounsbury, 2009). With a new emphasis on diversity programs, modeling best practices of business and other agencies lead to legitimacy with constituents and employees.

Copying another organization's hiring practices can be viewed as the best direction for programs with high ambiguity like equity and diversity programs. As the environment shifted to influence agencies to adopt diversity programs, both Equal

Employment Opportunity offices and newly developed diversity offices position themselves for survival amidst the changes through professionalization of their fields (Kelly, Dobbin, 1998, Kalev, Dobbin, 2006, Pitts, Hicklin, Hawes, Melton, 2010, Edelman, et al., 2011). Equal Employment Opportunity offices (EEO) were established in the 1960s but had to maintain their position through stronger professional networks across federal agencies as Diversity offices established themselves as a separate field (Kelly, Dobbin, 1998, Kalev, Dobbin, 2006). In some cases, agencies combined both the EEO and Diversity offices (Kalev, Dobbin, 2006, Edelman, et al., 2011). Normative pressures result in professionalization of different fields within organizations through formal education, certifications, and professional networks (DiMaggio, Powell, 1983, Kelly, Dobbin, 1998, Tilcsik, 2010). These professionals establish professional norms and legitimacy within organizations (DiMaggio, Powell, 1983, Kelly, Dobbin, 1998, Tilcsik, 2010). Agency response to fair hiring law might include creating offices and professionals (e.g. EEO Managers) to manage processes. Through the three mechanisms, organizations gain the same shape, becoming isomorphic (DiMaggio, Powell, 1983).

### **Degrees of Equity and Diversity Program Integration**

These mechanisms influence organizations to integrate practices to varying degrees. When practices are integrated, the organization's practices and goals are tied together, resulting in efficient formal structures (Meyer, Rowan, 1977, Bromley, Powell, 2012). Sometimes, practices are not integrated or rather tied to the organization's core function, instead, there is a gap between what the organization claims they are doing and what is actually done (Meyer, Rowan, 1977, MacLean, Behnam, 2010). Organizations maintain formal structures for legitimacy while remaining detached from practices

(Meyer, Rowan, 1977, Edelman, et al., 2011, Crilly, Zollo, Hansen, 2012). There may also be gradual stages where practices are not fully integrated within the routine, but moving toward integration (Junaid, Leung, Buono, 2015). There is a vested interest of leaders to integrate programs into the organization's routine because integration is viewed as a degree of success.

This success seems to escape some agencies currently addressing minority representation through equity and diversity programs. The Equal Employment Opportunity Commission (EEOC), through their Management Directive (MD) 715, defines successful adoption and integration of equity and diversity practices. The MD 715 identifies six Essential Elements (Figure 1) as indicators that practices have been adopted and become routine. When taking a closer look at the MD 715 Essential Element B, "Integration of EEO into Agency's Strategic Mission", for the Department of Homeland Security (DHS), the practice (EEO) is not integrated into the function (mission). The response from DHS in their 2011 report was,

*"The barrier analysis found insufficient evidence of clear linkages between the DHS mission and EEO. There was no visible infrastructure that involved or included senior leadership in a process which oversaw the commitment to equal opportunity and the ability of the organization to meet EEO goals" (MD 715, DHS, 2011).*

DHS initiated this practice in 2008 with a target date for completion 2011. DHS requested a new target date of 2014 for completion of this practice. When equity and diversity practices are not connected to the organization function, practices are not integrated, however, when connected to the organization's function, practices become a routine activity. There are other challenges to integrating practices as representation is redefined.

With the elimination of Affirmative Action programs which included goals and quotas for underrepresented groups, diversity programs began to redefine representation. Diversity programs added to the definition of representation of race, color, national origin, gender, and religion, differences such as learning styles, personalities, education, and familial status (Loden, 1996). The shifts or moving away from how representation is defined with diversity programs creates more ambiguity when trying to meet the goals of equity and diversity programs. When rules and goals are ambiguous, it produces uncertainty and may shape leaders' foci on programs and how they define diversity (Sturm, 2001). Leaders began adopting new terminology of representation to include generational diversity, personality differences, educational, and familial differences when stating they have a diverse workforce. Equal Employment Opportunity programs still exist, but against a backdrop of diminished legal requirements through diversity programs. It is more difficult for leaders to meet the goals of equity and diversity programs when they are uncertain of the goals. Shifting to new definitions of representation adds to the challenge of integrating practices and further challenges legal mandates, as there are no laws to hire a certain personality.

### **Key Actors: New Responsibilities**

There are many factors influencing agencies' decisions to adopt and integrate practices. Whether internal or external pressures on organizations, adoption and eventual institutionalization of programs can be challenging. Of the many factors, how do institutional pressures and various levels of leaders within agencies influence adoption and integration of equity and diversity practices? Not only did the environment shift across time but also changing roles of key actors from 1960 to present influence the

adoption and integration of equity and diversity practices. From 1960 to 1980, key actors influencing the adoption and integration of mostly equity programs were EEOC and EEO Managers (DuRivage, 1985, Kelly, Dobbins, 1998). The legal mandates were politically stronger with Affirmative Action and Affirmative Employment programs (DuRivage, 1985). In the 1980s, the strength of these programs weakened as the political climate shifted to remove Affirmative Action programs and change the key actors from EEOC and EEO Managers to the senior leadership in organizations (DuRivage, 1985, Kelly, Dobbins, 1998). With diminished focus on Affirmative Action and an increased focus on diversity programs, key actors in the 1990s shifted to shared responsibilities between the senior leader and middle manager of organizations to implement equity and diversity programs with direction and guidance from EEO and Diversity Managers (DuRivage, 1985, Kelly, Dobbins, 1998).

### **Key Actors: Representative Bureaucracy**

Every leader or key actor has their own motivation for influencing the integration or lack of integration of programs. Another key actor motivated to adopt and implement programs to address minority representation is minority leaders. Minority leaders at senior levels are motivated to adopt and implement programs that will benefit minorities (Grissom, Keiser, 2011). Diversity management research is often within the context of representative bureaucracy, examining the influence of policy and the demographic composition of those making policy (Grissom, Keiser, 2011, Bradbury, Kellough, 2011, Pitt, 2009). Active Representative Bureaucracy research states policies, practices, and programs are implemented to benefit minorities when minorities are sitting at the senior level in organizations (Meier, Oct 1993). This research will examine how minorities at

the senior level influence the integration of equity and diversity practices. Additionally, this research will introduce three key actors, the agency's senior (executive) leaders, middle managers, and EEO Managers and Diversity Managers, and examine the degree to which they influence program integration.

### **Key Actors: Introducing the Three-tier-level of Leadership**

#### **Motivations and Pressures**

Since these three key actors influence the degree to which program are integrated, what lends to legitimacy during shifting environmental pressures at any given time may be the outcome of the program. An EEO/diversity manager may establish a minority college recruitment program that involves participation from senior leaders in the agency. As senior level leaders adopt and make this practice a core function, they are viewed as advocates of minority representation within the agency and gain legitimacy with internal and external minority groups. Conversely, a middle manager may adopt a mentoring program designed to prepare underrepresented groups for senior level positions. Beyond the initial meeting introducing the program, the middle manager becomes preoccupied with the routine of daily tasks yet boasts of establishing a mentoring program. With mere adoption of the program, the middle manager does not gain legitimacy with underrepresented groups seeking mentorship. The shifts in pressures may be the same, but the degree practices are integrated may differ.

In 2011, Executive Order 13583 shifted the environment in a movement towards implementing equity and diversity practices in federal agencies (EO 13583, 2011). When Executive Order 13583, Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce, was established, there were

senior leaders scrambling to develop diversity strategic plans, set up offices, take a new look at their MD 715 to use data as an indicator of their accomplishments in equity and diversity programs (EO 13583, 2011). The EEO Managers were forced to reinvent themselves and show their relevancy to senior leaders in their agency while Diversity Managers were setting up offices with a newly found niche in agencies, both intending to survive this environmental shift. Senior and middle level leaders were not fighting for the survival of their position and generally focused on numerous programs throughout the agency (Edelman, 1992, MacLean, Benham, 2010, Edelman, et al., 2011). Senior and middle level leaders, under coercive and mimetic mechanisms, do not necessarily advocate for implementation of specific programs but for survival of their agency. Meaningful outcomes differ for different leaders.

There are many competing interests these leaders face, to include other programs that are given higher priority based on how well the program fits into their mission priorities or political influence at the time. While executives and middle managers are fighting for the survival of numerous programs to keep the agency relevant, EEO and diversity managers are fighting for the survival of their program as they compete with other programs that have taken center stage in the agency. Because of these competing interests, executives and middle managers' response to institutional pressures varies significantly when implementing programs. When given a mandate to implement equity and diversity programs, executives and middle managers, symbolic implementation (as is often the case) may provide the legitimacy with employees impacted by these practices. Legal requirements, copying practices of other organizations, and professional norms

influence implementation in different ways and leaders' motivation have a profound impact (Edelman, 1992, Kelly, Dobbin, 1998, Tilscik, 2010).

When addressing the representation of minorities in SES, how do shifting institutional pressures (coercive, normative, and mimetic) influence the degree to which equity and diversity practices are integrated? How do different key actors influence the degree to which equity and diversity practices are integrated? This research will analyze three levels of leaders to see if they differ based on how they explain their adoption and integration of equity and diversity programs and how it fits with their mission in documents and interviews. These differences will map onto differences in how leaders incorporate practices into workplace routine.

### **Problem Statement**

Agency leaders are given mandates, guidance, and recommendations to integrate equity and diversity programs and practices. Some leaders integrate practices, while other leaders gradually integrate practices, and some do not integrate practices at all. There is little research examining how both shifting institutional pressures, shifting responsibilities of leaders, and how minority representation at the senior level influences adoption and integration of practices in federal agencies.

### **Statement of Purpose and Research Questions**

The purpose of this qualitative case study is to understand how three levels of leaders respond differently to shifting pressures and shifting responsibilities when integrating equity and diversity practices in various agencies. Additionally, this study analyzes how minority representation at the senior level influences the degree practices

are integrated. Agency leaders at different levels are given the responsibility to implement equity and diversity programs. Equal employment opportunity laws and mandates, diversity best practices, agency mission, and the establishment of the Equal Employment Opportunity and diversity profession have all influenced agency leaders' response to address the issue of minority representation at the Senior Executive Service level. Responses vary from full or partial implementation of some practices to no implementation at all. Researcher suggests shifting environmental and organizational pressures and shifting leadership oversight of equity and diversity programs influences the degree to which programs are adopted and institutionalized within agencies. Senior level leaders, middle level leaders, and EEO Managers and diversity managers adopt and institutionalize practices in response to pressures across time, resulting in different degrees of integration. This study seeks to contribute to institutional theory with a focus on the influence of pressures on organizational leaders to institutionalize equity and diversity programs by applying frameworks from organizational theory. Drawing upon three areas in literature, this research examines how DiMaggio and Powell's institutional pressures or mechanisms of coercive, mimetic, and normative influence leaders (DiMaggio, Powell, 1983, Kelly, Dobbin, 1998, Tilcsik, 2010). Additionally, using Meyer and Rowan framework of integration of programs and diversity management literature, this research examines how leaders respond to mechanisms, resulting in integrating, lack of integration, or gradual integration of equity and diversity practices, programs, and initiatives (Meyer, Rowan, 1977, Kelly, Dobbin, 1998, Tilcsik, 2010, Junaid, Leung, Buono, 2015). Lastly, research also seeks to contribute to Representative Bureaucracy, examining how minority representation at the senior level influences the

integration of equity and diversity practices in agencies (Grissom, Keiser, 2011, Pitts, 2009).

Researcher set out to examine these questions:

### **Research Questions**

1) How do shifts in leaders' responsibilities influence the integration of practices 2) How do shifts in institutional pressures influence the integration of practices 3) To what degree are practices integrated by three levels of leaders, and 4) how does representation of minorities at the SES level influenced the integration of practices?

### **Research Design Overview**

This multicase comparative analysis looked for relevant variation between three levels of leaders from various agencies to better understand how leaders explain how they respond to different pressures. Research draws on analysis of interviews with 18 leaders from three levels of leadership and selected agencies. Following the interviews, informants' agencies were selected to gain a greater understanding of how programs were adopted and integrated through an analysis of reports and surveys from 2004 through 2017 and how representation at the senior level influence the integration of practices. Reports and surveys included Management Directive 715 (MD 715), Federal Employee Viewpoint Survey (FEVS), and the Partnership for Public Service 2017 list of Best Places to Work in the Federal Government in Support of Diversity (Best Places to Work.org, 2017). Use of reports, survey results, and interviews resulted in a more robust study. Reports and survey results identify practices, explain how practices are adopted, the degree they are integrated, provide varied responses from both employees and leaders, explain how leadership levels are mentioned, and identify minority and non-minority

representation at the senior level. Interviews with three levels of leaders, the relevant decision makers in the agencies, identify how pressures influence them to adopt and to what degree practices are integrated. During analysis of interviews, researcher uses Edelman et al. four-part typology strategies to examine how similar pressures influence the extent to which senior level, middle level, EEO and Diversity Managers institutionalized equity and diversity practices in agencies (Edelman, Petterson, Chambliss, Erlanger, 1991). Instead of focusing on whether an organization did or did not comply with the law, Edelman et al.'s study focuses on how Affirmative Action Officers respond to internal and environmental normative pressures when implementing practices. Compliance with the law does not mean outcome. Since Edelman et al.'s study, the emphasis of compliance with equity laws has changed. With the introduction of diversity initiatives, less emphasis has been placed on compliance with the law and more emphasis on adoption of best equity and diversity practices. Similar to Edelman et al.'s research, 27 years later, this research focuses on how key actors respond to shifts in their roles, legal mandates, political influence, agency mission, and establishment of professional norms when integrating equity and diversity practices. All of these factors may influence the strategy leaders use from the four-part typology. Similar to Edelman et al.'s categorization of Affirmative Action Officers as Advocate, Team Player, Professional, or Technician, the leaders interviewed in this research are also categorized within the four-part typology. Here is a brief description of each strategy. The Advocate strategy aggressively pursues the interest of minorities at the risks of conflicting with management, Team Player views the priority of management as primary over the interest of minorities, Professional is neutral with the focus of fairness and good personnel policy,

lastly, Technician focus on collection of statistics and demographic reporting. These strategies are explained in more detail in the methodology and analysis section.

Triangulation of interviews and agencies' documents provide additional insight for institutional theory, diversity literature, and representative bureaucracy with a greater understanding of how shifting pressures on leaders at various levels, shifting leadership roles, and minority representation at the senior level influence integration of programs.

Upon completion of the interviews, the researcher selected the informants' agencies for further understanding of the degree equity and diversity practices are adopted and integrated (see figure 1). Using reports and documents, this research examines: how practices are integrated across time with shifting institutional pressures, the degree to which practices are integrated across time, and how representation of minorities at the SES level influence the integration of practices. Interviews were coded and analyzed while agency reports and plans were coded and revised throughout the analysis. To present a narrative of conclusions drawn from this research, researcher analyze patterns, themes, contrasts, comparisons, clustering, and counting followed by triangulating interview, report, and survey data (Miles, Huberman, Saldana, 2013). As Miles, Huberman, and Saldana stated, "Writing is thinking, not the report of thought".

### **Assumptions**

Based on my experience and background in Equal Employment Opportunity and diversity, four assumptions were made. First, EEO/diversity managers' influence over the integration of practices decreased across time while SES and middle managers' influenced increased. This assumption is based on the changing canvass from EEO in the front during the 1970s and moved to the back during the 1980s as agency heads were

given more authority over the execution of these programs and at the same time diversity programs began to emerge (duRivage, 1985, Kelly, Dobbin, 1998). This resulted in both EEO and diversity professionals competing for job security (Kelly, Dobbin, 1998, Kalev, Dobbin, 2006). The second assumption is amongst the three levels of leaders, EEO/diversity managers are more likely to integrate practices than SES and middle managers. This assumption is based on the known motivation of EEO Managers and diversity practitioners to protect their programs (Kelly, Dobbin, 1998). The third assumption is institutional pressures shift across time to less regulatory when influencing how leaders integrate equity and diversity programs. This assumption is based on senior leaders' new role beginning in the 1980s of integrating equity and diversity programs without as many regulatory constraints (duRivage, 1985). Without regulatory constraint, leaders may or may not integrate equity and diversity programs. Lastly, the expectation is that minority representation at the senior level increases the adoption and integration of equity and diversity practices. This assumption is based on previous research that supports minority representation at higher levels increases support for practices that address minority underrepresentation (Grissom, Keiser, 2011, Pitts, 2009).

### **Researcher**

While conducting this study, I worked in both diversity and Human Resource offices. The Human Resources office works directly with the EEO office and indirectly with some EEO programs in federal agencies. Since 1993, before conducting this study, while working in Human Resources, Equal Employment Opportunity, and diversity offices in both the private and public sector, I observed the shifts in leadership roles and shifting institutional pressures. I have been at the helm, with the responsibility of

integrating these programs nationally within my agency. Key actors vary in how they integrate programs, regardless of location. During the creation of Executive Order 13583 in 2011, mandating all federal agencies implement diversity programs, I witnessed frustration from the office responsible (OPM) for ensuring agencies abided by the mandate (OPM Interview, 2016). Integration of diversity programs by agencies varied significantly and the OPM representative for Diversity and Inclusion programs spent countless hours and resources trying to determine what level or key actor in the agencies would be most likely to integrate these programs (OPM Interview, 2016).

My background brings practical experience and understanding of the historical and current day context of EEO and diversity programs. I acknowledge this same experience could bias my judgment in research design and interpretation of findings. Continuous dialogue with my Chair, committee, colleagues, and triangulation of data sources increase objectivity.

### **Rationale And Significance**

The rationale for this study emerges from the researcher's desire to better understand how shifting institutional pressures influence agencies at a micro level, specifically amongst key actors within agencies when integrating equity and diversity programs. Along with shifts in institutional pressures, leadership responsibility for these programs has also shifted. Research so far on how mechanisms influence organizations and key actors has produced mixed results. Key actors in agencies continue to receive mandates and recommendations to implement these programs, but the degree to which they integrate programs range from full integration, gradual integration, to no integration at all and sometimes without a clear understanding how they vary.

Increased understanding of how shifting pressures influence leaders at different levels in the agency may decrease the varied responses amongst agencies when program implementation is the desired outcome. Leaders within agencies may be able to anticipate the degree to which a program will be implemented by including the institutional pressures as key elements of the integration process. Leading agencies such as the Office of Personnel Management, Equal Employment Opportunity Commission, and other agencies that introduce, mandate, and recommend program implementation, may spend less time inquiring why some agencies adopt and implement programs and others do not. Greater understanding of this phenomenon may save time and dollars spent introducing programs followed by adding more resources to encourage integration and auditing the implementation of these programs. With less time and money spent asking why program implementation varies, more time and money may be spent on the efficacy of these programs. Additionally, gaining an understanding of how minority representation at the senior level influences the degree to which equity and diversity programs are adopted and integrated into the agency will add to this research. This research has implication for all program implementation.

## **Definitions of Key Terminology Used in This Study**

Minority - A group within a country or state that differs in race or national origin from the dominant group. The racial ethnic minority groups used in this research are American Indian, Alaskan Native, Asian, Pacific Islander, Black, and Hispanic/Latino.

Underrepresentation/Underrepresented - Situation in which the number of women or members of a minority group within a category of civil service employment constitutes a lower percentage of the total number of employees within the employment category than the percentage that women or the minority group constitutes within the civilian labor force of the United States.

Equity and Diversity Practices, Programs, Initiatives – Practices, programs, and initiatives designed to address the demographic composition of minorities in the workplace, specifically, minorities in SES positions, feeder groups (GS – 13, 14, and 15), or other minorities interested in SES positions. The terms equity and diversity practices are used interchangeably.

Management Directive (MD) 715 Essential Elements – Equal Employment Opportunity Commission (EEOC) defines Elements as indicators that practices are integrated. The Essential Elements are:

- A) A demonstrated commitment from agency leadership through written policy statements.
- B) Integration of Equal Employment Opportunity (EEO) programs into the agency's strategic mission.
- C) Agency leaders hold managers, supervisors, and EEO officials responsible for implementation of the programs and practices.
- D) Agency leader make every effort to eliminate barriers and prevent discrimination.
- E) Agency leaders ensure effective systems are in place for evaluating the impact and effectiveness of EEO programs.
- F) Agencies are in full legal compliance with EEO laws, regulations, policies, and other instructions.

## **Figure 1 – Degree Practices Integrated**

### **Interview Data**

Practices reported by informants as existing five or more years are considered integrated.

### **MD 715 Data (EEOC website) –Essential Elements**

Used EEOC’s definition of integration EEO into the agency’s strategic mission. EEOC provides an in depth description of how integration of EEO is defined in sections A through E in Part G of the report. Researcher used these compliance indicators to determine the degree practices were integrated based on data agencies reported.

Categories are:

- Some but not all programs integrated
- Most but not all programs integrated
- All programs integrated

#### Section A - Demonstrated commitment from agency leadership

“MD-715 requires agency heads and other senior management officials to demonstrate a firm commitment to equality of opportunity for all employees and applicants for employment. Agencies must translate equal employment opportunity into everyday practice and make those principles a fundamental part of agency culture. Commitment to equal employment opportunity must be embraced by agency leadership and communicated through the ranks from the top down. It is the responsibility of each agency head to take such measures as may be necessary to incorporate the principles of EEO into the agency’s organizational structure. In addition, this section establishes that agency heads must issue a written policy statement expressing their commitment to EEO and a workplace free of discriminatory harassment. This statement should be issued at the beginning of their tenure and thereafter on an annual basis and disseminated to all employees.”

#### Section B - Integration of EEO programs into agencies’ mission

This is how EEOC determines if agencies integrated programs:

“As part of integrating EEO into the strategic mission, Section II (B) of MD-715 instructs agencies to ensure that: (1) the EEO Director has access to the agency head; (2) the EEO office coordinates with Human Resources; (3) sufficient resources are allocated to the EEO program; (4) the EEO office retains a competent staff; (5) all managers receive management training; (6) managers and employees are involved in implementing the EEO program; and (7) all employees are informed of the EEO program.”

#### Section C - Manager and supervisor accountability

“A model EEO program will hold managers, supervisors, EEO officials, and personnel

officers accountable for the effective implementation and management of the agency's program. As part of management and program accountability, MD-715 provides that agencies should ensure that: (1) the regular internal audits are conducted of the EEO program; (2) EEO procedures are established; (3) managers and supervisors are evaluated on EEO; (4) personnel policies are clear and consistently implemented."

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#### Section D - Proactive prevention of unlawful discrimination: Demographics

"As part of the affirmative employment program, agencies must conduct a self-assessment of their work force on at least an annual basis to monitor progress, identify areas where certain groups may be excluded and develop a strategic plan to ensure free and open competition in the workplace."

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#### Section E - Efficiency

This is how EEOC determines if agencies integrated programs:  
"Requires that the agency head ensure that there are effective systems in place to evaluate the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process."

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#### **FEVS Data**

Used Partnership for Public Service index scores for the category of Best Places to Work in Support of Diversity. Agency scores were placed in one out of four quartile:

- Lower Quartile (0-25%)
- Below Median (25-50%)
- Above Median (50-75%)
- Upper Quartile (75-100%)

Since above median score was considered acceptable in this report, scores above median or higher was used as an indicator that practices were integrated.

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**Summary Discussion**

This chapter describes the critical elements of a research study: problem, purpose, and research questions. It emphasizes the connection of these elements that comprise the central function of this research and all subsequent components depend on how successfully these elements are constructed and aligned. This chapter also describes elements that form a well-developed introductory chapter that includes researcher approach, assumptions and perspective as well as rationale and significance, and definitions of key terminology (Bloomberg, Volpe, 2012).

## **Chapter 2 –Literature Review**

### **Overview**

The purpose of this multicase study is to understand how three levels of leaders respond differently to shifting pressures and shifting responsibilities when integrating equity and diversity practices in various agencies. Additionally, this study analyzes how minority representation at the senior level influences the degree practices are integrated. Senior level leaders, middle level leaders, and EEO Managers and diversity managers adopt and institutionalize practices in response to pressures across time, resulting in different degrees of integration. This study seeks to contribute to institutional theory with a focus on the influence of pressures on organizational leaders to institutionalize equity and diversity programs by applying frameworks from organizational theory. Drawing upon three areas in literature, this research examines how DiMaggio and Powell's institutional pressures or mechanisms of coercive, mimetic, and normative influence leaders (DiMaggio, Powell, 1983, Kelly, Dobbin, 1998, Tilcsik, 2010). Additionally, using Meyer and Rowan framework of integration of programs and diversity management literature, this research examines how leaders respond to mechanisms, resulting in integrating, lack of integration, or gradual integration of equity and diversity practices, programs, and initiatives (Meyer, Rowan, 1977, Kelly, Dobbin, 1998, Tilcsik, 2010, Junaid, Leung, Buono, 2015). Lastly, research also seeks to contribute to Representative Bureaucracy, examining how minority representation at the senior level influences the integration of equity and diversity practices in agencies (Grissom, Keiser, 2011, Pitts, 2009). To conduct this review, researcher used multiple sources to include books, journals, periodicals, and Internet resources. Sources were accessed through

JPART, JSTOR, VT.lib, ProQuest, Elsevier, Academia.edu, SAGEpub, and Wiley.

Researcher did not use a specific delimiting timeframe to conduct this search. This is due to the bodies of literature, which span a timeframe of historical and current development and their relationship with the evolving equity and diversity literature. Keywords and topics searched were related to equity and diversity practices in the workplace, equity and diversity at the senior level, adoption, integration and implementation of practices in the workplace, neoinstitutionalism, and representative bureaucracy.

Researcher identified gaps, discussed relevant inconsistencies, and contested areas in literature. Each section in the literature review includes a synthesis of research implications. This review will conclude with a summary of this chapter of how literature has informed the researcher's understanding and contributes to the development of this study.

### **Section 1 - Shifting - Coercive, Normative, and Mimetic**

When organizations implement programs, there is always a pressure motivating them. In this section, researcher will discuss three mechanisms or pressures, normative, coercive, and mimetic that influence organizations to adopt and implement programs. Specifically, researcher will discuss how mechanisms (normative, coercive, and mimetic) shift and influence the adoption and sometimes integration of EEO, diversity, and other practices within organizations.

Normative, coercive, and mimetic are not static but shifting pressures (Ashworth, Boyne, Delbridge, 2007). When adopting programs, organizations may experience environmental pressures because of changing laws, political, and public influence

simultaneously or at different times. When this occurs, different mechanisms exert more influence at a given time. When agencies adopt programs, practices, and initiatives mandated by law, social pressure, or professional norms, the reward is often legitimacy and social acceptance amongst its constituents (Bromely, Powell, 2012). Coercive, normative, and mimetic pressures were evident in federal agencies as they created structures in response to discriminatory hiring and promotion practices as well as other equity issues prior to the creation of the SES position in 1979 (duRivage, 1985, Edley, Stephanopoulos, 1995). Both coercive and mimetic pressures most often result in symbolic implementation of equity and diversity programs (Edelman, 1992, MacLean, Benham, 2010, Edelman, et al., 2011). Organizations may respond to laws and mandates or copy best practices of others by creating visible symbols of compliance (Edelman, 1992). Beyond symbolic implementation, there is evidence that normative pressures result in adoption and integration of equity and diversity programs (Kelly, Dobbin, 1998, Tilscik, 2010).

Although normative pressure exerted significant influence in the adoption and integration of equity and diversity programs and other programs, it was not without the influence of legal influence (duRivage, 1985, Kelly, Dobbin, 1998, Tilscik, 2010). Across time, shifts in the political environment influenced coercive pressures on equity and diversity programs. Prior to the decline of Affirmative Action and Affirmative Employment Programs in 1981, coercive pressures exerted more influence on program adoption and implementation (duRivage, 1985, Kelly, Dobbin, 1998). With greater impact to enforce Affirmative Action laws under the Equal Employment Commission Act of 1972, from 1972 through 1980, organizations sought ways to comply by

increasing equity programs and EEO staffing (Kelly, Dobbin, 1998). As the political environment shifted under the Reagan Administration, coercive pressure to adopt and integrate equity programs also shifted. Not only did the environment shift Equal Employment Opportunity laws but also shifted the responsibility for oversight and implementation of these programs from Equal Employment Opportunity Commission (EEOC) to leaders within the agencies (duRivage, 1985). Following the decline of Affirmative Action Programs in the 1980s, agencies began to copy the public and private sector's best practices in diversity as EEO related programs were viewed as antecedents to, and partly replaced by diversity programs (Edelman, 1992, Kalev, Dobbin, 2006, Dobbin, Kalev, Kelly, 2006). With organizations boasting of their successful diversity initiatives and business sector diversity programs out pacing government organizations, pressure increased for federal agencies to copy the success of other diversity programs (Yang, Konrad, 2011). Unlike EEO programs, diversity programs are rarely mandated but often copied through the sharing of best practices from one organization to another (Edelman, Fuller, Mara-Dritra, 2001, Kellough, Naff, 2004, Kalev, Dobbin, 2006). The expectation is practices would be adopted and institutionalized, but the outcome is often practices that are integrated separate from the overall technical functions of the organization (Meyer, Rowan, 1977, Edelman, Fuller, Mara-Dritra, 2001, Kellough, Naff, 2004, Kalev, Dobbin, 2006, Kalev, Kelly, Dobbin, 2006, Pitts, Hicklin, Hawes, Melton, 2010). Other research shows mimetic and normative mechanisms combined, resulted in adoption and integration, as seen in the adoption of stock exchanges, while coercive mechanism, as in legally mandated programs such as EEO, did not (Weber, Davis, Lounsbury, 2009). The study examines how countries, similar to organizations, adopt

and subsequently integrate programs or in this case, the integration of stock exchanges. Countries' stock exchanges that went from adoption to successful integration, is a result of peer influence and normative emulation of successful countries' exchanges (Weber, Davis, Lounsbury, 2009). Additionally, research shows coercive, normative, and mimetic pressures in organizations are least important when comparing drivers that influence the implementation of diversity programs (Pitts, et al., 2010). Although research is mixed, strong evidence shows normative pressures lead to integration and desired outcomes, especially when key actors influence outcomes.

In summary, the shifting pressures or mechanisms may or may not result in the adoption and implementation of programs. Instead it may result in symbolic gestures for legitimacy with constituents and employees. This influence may have different outcomes. Coercive and mimetic may be attributed to symbolic outcomes whereas normative results in adoption and implementation of programs. Just as mechanisms impact adoption and integration in organizations, internal forces such as key actors within organizations also have an impact on integration of programs.

## **Section 2 - From Macro to Micro - Pressures Impacting Key Actors**

Next, researcher will discuss how the same pressures influence actors within organizations. Often, organizations are influenced by pressures to become isomorphic; this section will view the influence from a micro level. Introducing three levels of leaders, senior level, middle level (middle manager), and the subject matter expert (the owner of the program), researcher will discuss leader's motivation and how pressures influence them to adopt and integrate practices. When addressing practices, this section

specifically identifies how the responsibility for implementing equity and diversity practices has shifted. Further discussion includes how three levels of leaders influence different outcomes when adopting and implementing programs.

Key actors, such as senior leaders, middle managers, and subject matter experts (EEO/diversity managers), have their own perception of practices (MacLean, Behnam, 2010). These perceptions influence the value they place on that practice and their commitment to go beyond adoption to integration (MacLean, Behnam, 2010). Quite often, leaders at the senior level experience political pressure and middle managers are inundated with the task of producing immediate results for their programs. This is not only applicable to equity and diversity programs but also in the case of stock repurchase programs where programs remain more symbolic than substantive (Westphal, Zajac, 2001). In this case of stock repurchase programs, Westphal and Zajac stated,

“Top managers’ political interests was to preserve managerial discretion over the allocation of corporate resources, and external institutional pressure from investors and other constituents to adopt and implement policies such as repurchase programs that demonstrate commitment to shareholders by returning free cash flow to investors. It appears that firms are more likely to avoid institutional pressures for change using tactics such as decoupling when those institutional pressures conflict with interests of actors who hold power in the organization” (Westphal, Zajac, 2001).

Whether a legal mandate to implement a mentoring program for underrepresented minorities, or institutional pressure to implement a stock repurchase program, senior leaders and middle managers do not always view the immediate value of some programs (Meyer, Rowan, 1977, Westphal, Zajac, 2001, MacLean, Behnam, 2010). When this happens, leaders decouple or neglect to tie programs to core functions, find an empty window, and dress it with symbolic programs to remain legitimate (Meyer, Rowan, 1977, DiMaggio, Powell, 1983, MacLean, Behnam, 2010). This legitimacy can lead to an environment of institutionalized misconduct where other leaders within the organization

observe and mimic this behavior or even worse, leaders become skilled in symbolic manipulation (Westphal, Zajac, 2001, MacLean, Behnam, 2010). Programs like equity and diversity are ambiguous and agency accountability to use these programs is weak or does not exist (Kelly, Dobbin, 1998). During the 1980s, the Reagan Administration weakened both the laws governing Affirmative Action programs and the key actors responsible for the oversight of the programs, such as EEOC (duRivage, 1985, Kelly, Dobbin, 1998). The Administration gave oversight authority to a new actor, senior leaders of organizations, who, in turn, shared that responsibility with middle managers (duRivage, 1985, Kelly, Dobbin, 1998). As roles of the key actor, EEOC, diminished or shifted, new key actors, senior leaders and middle managers, were given the responsibility of implementing equity and diversity programs within their organization with the assistance of EEO Managers/Specialists. This introduced a shift where mimetic and normative mechanisms were more palatable than coercive mechanism when introducing equity and diversity programs along with newly created diversity managers to organizations. Prior to the shift in the 1980s, subject matter experts for EEO programs (e.g. EEO Managers) were the key actors.

In 1969, Affirmative Action Programs were established, which led to the creation of EEO professionals who received certified and specialized training (duRivage, 1985, Edelman, 1992, Edley, Stephanopoulos, 1995). Simultaneously, coercive and normative influenced the creation of structures to address discriminatory employment practices. Both private and public sector organizations hired Equal Employment Opportunity (EEO) Specialists to establish offices, maintain oversight of Affirmative Action and other EEO related programs designed to protect them from litigation due to unfair hiring (Edley,

Stephanopoulos, 1995, Kelly, Dobbin, 1998). Research suggests coercive pressures result in adoption but not integration of programs as agencies hired EEO and Diversity Managers into positions without giving proper authority to institutionalize practices (Kalev, Dobbin, 2006, Edelman, et al., 2011). Although there are mixed results, evidence supports normative pressures result in adoption and integration when individuals or offices are assigned the responsibility for the program (Kelly, Dobbin, 1998, Tilscik, 2010). Because professionals are personally motivated to succeed, by implementing programs focused on organizational effectiveness, and the bottom-line, the chances are reduced that their program will be eliminated. Regardless of external and internal political influence to symbolically adopt and implement programs, when the SME establishes the professional norm, constructing meaning of compliance, integration becomes a personal goal (Kelly, Dobbin, 1998, Tilscik, 2010). EEO specialists in federal agencies resisted the pressure of the political influence under President Reagan to eliminate many equal employment opportunity programs and offices through downsizing (Kelly, Dobbin, 1998). They respond to this shift with their own influence to establish a powerful structure within their organization and survive in an era when their profession was said to have outlived its usefulness (Kelly, Dobbin, 1998). Simultaneously, as the federal government increased deregulation, professional groups took advantage of these changes and influenced the adoption of diversity programs (Kim, Kalev, Dobbin, 2012).

Equity and diversity professionals are not the only ones competing for survival, since organizations are filled with diverse professional interests competing for the survival of their programs (Greenwood, Hinings, 1993). Similar to EEO Specialists' response to political pressure, trained economists, statisticians, and computer scientists

respond to political pressure by implementing a budgeting system that was symbolically adopted by senior level leaders with the intent to remain detached from the organization's routine (Tilscik, 2010). Additionally, professional networking was found to be statistically significant when comparing influences on school Superintendents' likelihood to implement diversity management (Pitts, 2009). Since we have evidence that normative pressures to implement programs applies to other fields, this research will increase our understanding as we further explore how shifting pressures within agencies impact key actors with competing ideas and interests (Tilscik, 2010).

Mechanisms, coercive, mimetic, and normative, not only shift but also are analytic and provide significant perspectives on how organizations and leaders are influenced (DiMaggio, Powell, 1983, Campion, Gadd, 2009, Marion, Gonzales, 2013). Normative and coercive may overlap in the professionalization of fields that are influenced by legal mandates (DiMaggio, Powell, 1983). Just as affirmative action laws mandated agencies create equal employment opportunity offices resulting in the professionalization of EEO Specialists, Executive Order 13583 mandated the establishment of diversity offices resulting in the professionalization of diversity managers (EO 13583, 2011, duRivage, 1985).

Normative and mimetic may overlap as organizations copy one another to establish professional norms that have become popular within certain fields. Prior to agencies' transition to diversity management practices, companies in the private sector create diversity offices and diversity professionals, often from within their human resources offices, providing legitimacy to phased out affirmative action practices (Gore, 1997, Kelly, Dobbin, 1998, Edelman, et al., 2011). Some federal agencies respond

similarly, establishing diversity professionals separate from EEO Specialists (Gore, 1997, Kelly, Dobbin, 1998). These key actors and institutional pressures that influence them play significant roles in program implementation.

### Introducing the Three-tier-level Leadership and Integration of Practices

Pressures influence key actors and actors integrate programs differently. This research introduces a three-tier-level leadership and conducts an analysis on the degree to which key actors integrates practices (see figure 2). The pressure to move practices from adoption to integration is influenced by senior-level, mid-level, and EEO/diversity-level leaders (Kelly, Dobbin, 1998, Kellough, Naff, 2004, Kalev, Dobbin, Kelly, 2006). This three-tier-level of leadership consists of senior level, department level, and the EEO and diversity manager. The senior level is usually the highest level leader or leadership group in the agency (Westphal, Zajac, 2001, Kellough, Naff, 2004, Nishii, Gotte, Raver, 2007, Pitts, 2009). The department level leader is responsible for a department and sometimes referred to as middle manager (Kelly, Dobbin, 1998). The other level in this research is the individual responsible for implementing and maintaining the equity and diversity programs, such as EEO and diversity managers (Kelly, Dobbin, 1998, Kalev et al., 2006, Tilcsik, 2010)

Ideally, the leader ties the program into the overall function of the agency, referred to as integrating (Meyer, Rowan, 1977). Integrating may be defined as institutionalizing practices into the organization to the degree it becomes routine in the workplace (Tilcsik, 2010, Bromley, Powell, 2012, Junaid, Leung, Buono, 2015). Programs are not always integrated; some programs are adopted by leaders but not

connected to the functions or technical efficiency (Meyer, Rowan, 1977). Programs may be adopted without becoming routine in the workplace, instead, remain on the periphery without ever being institutionalized. The establishment of Executive Order 13583 in 2011 mandated all agencies develop a diversity and inclusion program beginning with the creation of a diversity and inclusion strategic plan (EO 13583, 2011). Some agency leaders separate their organizational functions from diversity strategic goals (Meyer, Rowan, 1977, MacLean, Behnam, 2010).

Some leaders integrate programs while others do not, but institutionalization of programs also occurs through stages and are not always binary (Junaid, Leung, Buono, 2015). Programs are sometimes in a constant stage of integration (Junaid, Leung, Buono, 2015). Even when they are not integrated, there is a possibility the program will be revived and eventually integrated (Bromley, Powell, 2012, Junaid, Leung, Buono, 2015). For example, EEO Specialists and Diversity Managers adopt equity and diversity programs to appease stakeholders or because of federal oversight, with no intention of integrating, but over time the program became institutionalized (Kelly, Dobbin, 1998, Tilscik, 2010, Bromley, Powell, 2012, Junaid, Leung, Buono, 2015). Based on existing research, there are obvious, yet varied reasons leaders or key actors integrate some programs but not others. Adopting practices becomes a greater priority for legitimacy than integrating them in response to technical demands (Meyer, Rowan, 1977, Bromely, Powell, 2012). Senior level leaders are often credited and blamed for the degree in which programs are integrated. This occurred with stock repurchase programs where executives planned to only adopt the programs (Westphal, Zajac, 2001). The firms' top executives are blamed for not integrating stock repurchase programs because of the influence over

their boards (Westphal, Zajac, 2001). There are claims that senior level involvement increases integration and determines the degree to which an agency will develop their program (Kellough, Naff, 2004). Results from a survey of 160 federal agencies and sub-agencies indicate the degree to which diversity programs were integrated, rest largely on the senior level leader (Kalev, Dobbin, Kelly, 2006, Kellough, Naff, 2004).

In addition to senior level leaders, other levels of leadership in agencies influence the degree to which programs are integrated. The influence of EEO professionals to integrate programs despite the efforts by senior level leaders not to integrate is referred to as a phenomenon by researchers. Firms adopt EEO programs and establish offices with EEO professionals without expectation to use these programs (Kelly, Dobbin, 1998). The EEO professionals took the process one step further by institutionalizing the programs due to their own commitment to EEO. Similarly, trained economist, statisticians, and computer scientists implement a budgeting system that was adopted with senior level leaders' intent to not integrate (Tilscik, 2010). The irony in both of these situations is the leaders who integrate their programs appear to have a greater influence over the outcome than the senior level leader.

Similarly, department level leaders may influence the outcome of programs despite senior level leader influence. The department level leader, sometimes referred to as the middle manager (e.g. Information Technology, Training, or Finance department), is rarely mentioned in literature on equity and diversity practices other than being considered one who does not perpetuate integrating programs (Kelly, Dobbin, 1998, Dobbin, Kalev, 2006). Most often, the department level leader's focus is influenced by technical demands that often are separate from equity and diversity demands. Based on

the degree to which the program is valued, this leader may influence the degree to which the program is integrated. Middle managers' influence may impact both their area of responsibility and also their peers, which includes other department leaders. A comparison of the three-tier-level leaders' influence on the degree to which equity and diversity programs are integrated will provide a micro level analysis (Edelman, 1992, Cunningham, 2008).

### Senior Executive Service and Equity and Diversity Programs

Leaders are both influenced and the influencer when it comes to integrating programs. While feeling the pressure to act, they have an expectation that initiatives undertaken will increase their agency's effectiveness (Meyer, Rowan, 1977, Kelly, Dobbin, 1998, Kellough, Naff, 2004, Kalev, Dobbin, Kelly, 2006, Ng, Sears, 2011). In 1981, shortly after the creation of the Senior Executive Service position in 1979, equity programs were transitioning from legal mandates, through Affirmative Action to directives, giving agency leaders a greater role in the oversight of equity programs (Edley, Stephanopoulos, 1995) (duRivage, 1985). This shift gave leaders a greater role in determining if equity programs were integrated or not. Agency leaders' oversight increased in 1994 as agencies' emphasis shifted to adopting diversity programs based on diversity best practices from the other agencies and the business sector (Edley, Stephanopoulos, 1995) (Gore, 1997). Although leaders' roles were expanded, the Office of Personnel Management (OPM) and the Equal Employment Opportunity Commission, the agencies responsible for oversight of SES and equal opportunity, still mandated or recommended various equity and diversity initiatives (Edley,

Stephanopoulos, 1995, GAO Fed Workforce, 2014, SES Guide, 2014, OPM website, 2015, GAO 08-609T, 2008).

Under OPM's regulations implementing the Federal Equal Opportunity Recruitment Program (FEORP) report, agencies are required to determine whether representation levels for minority groups are lower than the civilian labor force and develop initiatives to address those differences (Edley, Stephanopoulos, 1995) (GAO 03-34, 2003). Using Management Directive (MD) 715 report, EEOC requires agencies to not only identify barriers that limit or restrict equitable opportunities for underrepresented groups, but also create practices to remove barriers (Edley, Stephanopoulos, 1995, GAO 03-34, 2003). These mandates and recommendations are given to all agencies but their responses are different. Some have adopted leadership development programs that are tied to their overall goals (GAO 03-34, 2003). Others agencies have established agency-wide human capital planning and executive succession programs, which include diversity as an element (GAO 03-34, 2003, GAO 08-609T, 2008, MacLean, Behnam, 2010).

Given the same mandates and recommendations, agency leaders are often singled out as the reason programs progress. During an update on the status of SES diversity in 2003, the Government Accountability Office (then General Accounting Office) stressed to the Sub Committee on Civil Service and Agency Organization, Committee on Government Reform, and House of Representatives the importance of the leadership role in agencies (GAO 03-34, 2003). They state, "continued leadership from OPM and EEOC and a strong commitment from agency managers, holding executives accountable for the diversity, would help ensure the diversity of senior leadership" (GAO 03-34, 2003). In

this research, a comparison of how different levels of leaders respond to pressures may provide better insight for agencies expecting to integrate these practices.

In summary, the three levels of leaders have differing motivations that drive them to implement programs and practices. The roles for adopting and implementing equity and diversity practices shifted from EEOC to senior leaders in organizations and the senior leaders shared the responsibility with their middle managers. Senior leaders are often motivated by political and other external pressures, middle leaders motivated by the technical efficiency, and the subject matter expert, which is the EEO/diversity manager in this research, is motivated to protect existence of their program. These motivations may lead to implementation or symbolic implementation. Their motivations are not independent of the institutional pressures that influence them. Kellough and Naff suggests senior level leaders' influence is most significant when integrating practices (Kellough, Naff, 2004). But despite the influence from political or senior level, a phenomenon reveals how professionals, in defense of their programs may apply their own influence (Kelly, Dobbin, 1998, Tilscik, 2010). Professionals' pressure is to integrate practices, pushing through the intention of senior leaders to symbolically adopt and implement. The three levels of leaders are motivated and respond differently. Although federal agency leaders are given the same mandates to address representation at the senior level, responses and outcomes differ. Researcher expects to examine further leaders' explanation how pressures influence these different outcomes and the degree practices are integrated.

### **Section 3 - Representative Bureaucracy – Influence of Senior Leaders**

In this last section, the researcher will discuss representative bureaucracy literature. There is evidence that minority representation at the senior level influences adoption and implementation of practices and programs designed to advocate for minorities. This section also includes the shift in how representation is defined with the increase of diversity programs that depart from EEOC's list of protected class.

Addressing representation in the workforce has been a priority in the federal government. Over five decades, equity and diversity programs have been adopted to increase minority representation in federal agencies. Just as equity and diversity laws, mandates, and initiatives have shifted across time, priorities placed on representation in federal agencies have also shifted. Representative bureaucracy theory suggests racial, ethnic, and gender diversity in the workforce will influence policy and programs in the interest of racial, ethnic, and gender diverse groups (Bradbury, Kellough, 2010). There are many benefits to having minority representation at senior levels in organizations. Representation of minorities at senior levels increases the likelihood of minority representation at all levels (Grissom, Keiser, 2011). Additionally, job satisfaction is higher amongst minority groups when they see minority representation at the senior level, policies advocating for minorities are more likely to be implemented, and organizations are more innovative and perform better when diverse (Miller, del Carmen, 2009, Pitts, 2009, Thomas, 2010, Grissom, Keiser, 2011). Minorities at the senior level whose EEO/diversity managers have clout are more likely to adopt practices and outperform organizations that did not (Nishii, Gotte, Raver, 2007).

The Civil Service Reform Act of 1978 not only created the SES position but also

added recruitment efforts through the FEORP to increase representation of minorities and women at the senior level (Kellough, Rosenbloom, 1992). To ensure accountability for this effort, SES performance appraisals included a requirement of meeting Affirmative Action goals (Kellough, Rosenbloom, 1992). Then programs designed to influence representation in agencies eliminated requirements for goals and quotas that were set through Affirmative Action programs. When goals are ambiguous it produces uncertainty, making it more difficult to address minority representation. Despite changes to eliminate goals and quotas, minority representation continues to resurface because of underrepresentation at the senior level in federal agencies. Representation of minorities at the senior level matters and this research seeks to understand how minority representation influences the adoption and integration of equity and diversity practices.

### **Literature Review Summary**

A significant number of studies focus on the influence institutional pressures have on organizations when implementing programs. Organizations institutionalize, muddle through, and deinstitutionalize practices, policies, and programs (MacLean, Behnam, 2010, Bromley, Powell, 2012, Junaid, Leung, Buono, 2015). Some organizations' responses are emergent, meaning external and internal pressures result in different responses that are not necessarily intentional. Organizational leaders' different understandings and expectations of practices also their inability to mimic some practices, leads to various responses to implement (Crilly, Zollo, Hansen, 2012). Although organizations are stated to have the responsibility of implementing practices, organizational cultures may deinstitutionalize practices (Kostova, Roth, 2002, Dobbin, Kalev, 2006, Cunningham, 2008). Literature on organization response to pressure

provides valuable research at the macro-level. It is also useful to better understand the intra-organization workings at different levels of leadership as pressures shift across time.

There has clearly been a shift in institutional pressures over time in the EEO and diversity area as well as a shift in responsibility for the implementation of these practices. This research expands upon existing literature, providing an emphasis on the micro-level approach when looking at how coercive, normative, and mimetic mechanisms influence the adoption and integration of practices. In figure two, practices move through several stages before they are integrated, not integrated, or gradually integrated. First, coercive, mimetic, and/or normative mechanisms influence practices. Next, these shifting mechanisms influence leaders' response to adopt the practices. Once adopted, three-tier-level of leaders influence whether practices are integrated, not integrated, or gradually integrated. It is beneficial for research to further explore how different levels of leadership respond differently or similarly to institutional pressures. Edelman et al. describes how Affirmative Action officers institutionalize or do not institutionalize compliance programs and Tilcsik describes how internal authority changed a government agency's adoption of a new budgeting system (Edelman, et al., 1991, Tilcsik, 2010). Once practices are adopted, what are key actors' responses and how do their responses vary? Following the explanation of table one, practices identified, the next chapter will describe the methodology used in this research.

**Practices Identified**

Researcher conducted a qualitative analysis of documents collected. The purpose of this study was to identify prevalent practices selected by policymakers to address the underrepresentation of minorities at the SES level. The details of this study is provided in Appendices A through C. During this research, 16 practices were recommended for adoption and integration within agencies (see Table 1). The practices were identified through content analysis conducted from October – December 2014 of 14 documents dated from 1994 through 2011 (Lanier, Young, 2015). In addition to these documents, other documents were reviewed for a comprehensive research of practices from 1980 (one year after the creation of the SES position) through 1993 and from 2012 through 2015. The documents listed identified programs, practices, and initiatives recommended for adoption and use within agencies (Appendices A through C). Although these practices were specifically identified to address minority representation in SES, all practices identified during analysis of this research will be used.

Table 1 Practices, Programs, and Initiatives Identified from 1994 – 2011

	<b>Practices</b>	<b>Prevalence (%)</b> 128 References made	<b>Use in Research</b>
1	Workforce and Succession Planning Strategies	16%	
2	Mentoring/development	12%	
3	Targeted Recruitment & Hiring Efforts	11%	
4	Plans (e.g. strategic plans)	11%	
5	Increased Oversight/Advisement	9%	
6	Performance Management Measurement/Accountability System (targeted to managers for working to promote a diverse and inclusive workforce)	9%	
7	Monitor Applicant/Promotion Hiring Ratio	8%	
8	Legislation/Executive Order	7%	
9	Organizational time/resources on problem	4%	
10	Task Force/Committee	3%	
11	Leadership commitment	3%	
12	Social gatherings	2%	
13	Strengthen HR/employment practices in general (no specific reference made to recruitment, selection, development, etc.	1.5%	
14	Onboarding	1.5%	
15	Conduct new study (e.g., survey) about the problem	1%	
16	D&I office	1%	

Note: Of the 128 references made to different practices, #s 1 – 4 were mentioned most often.

## Equity and Diversity Practices: Mechanisms and Leadership Influencing Integration of Practices

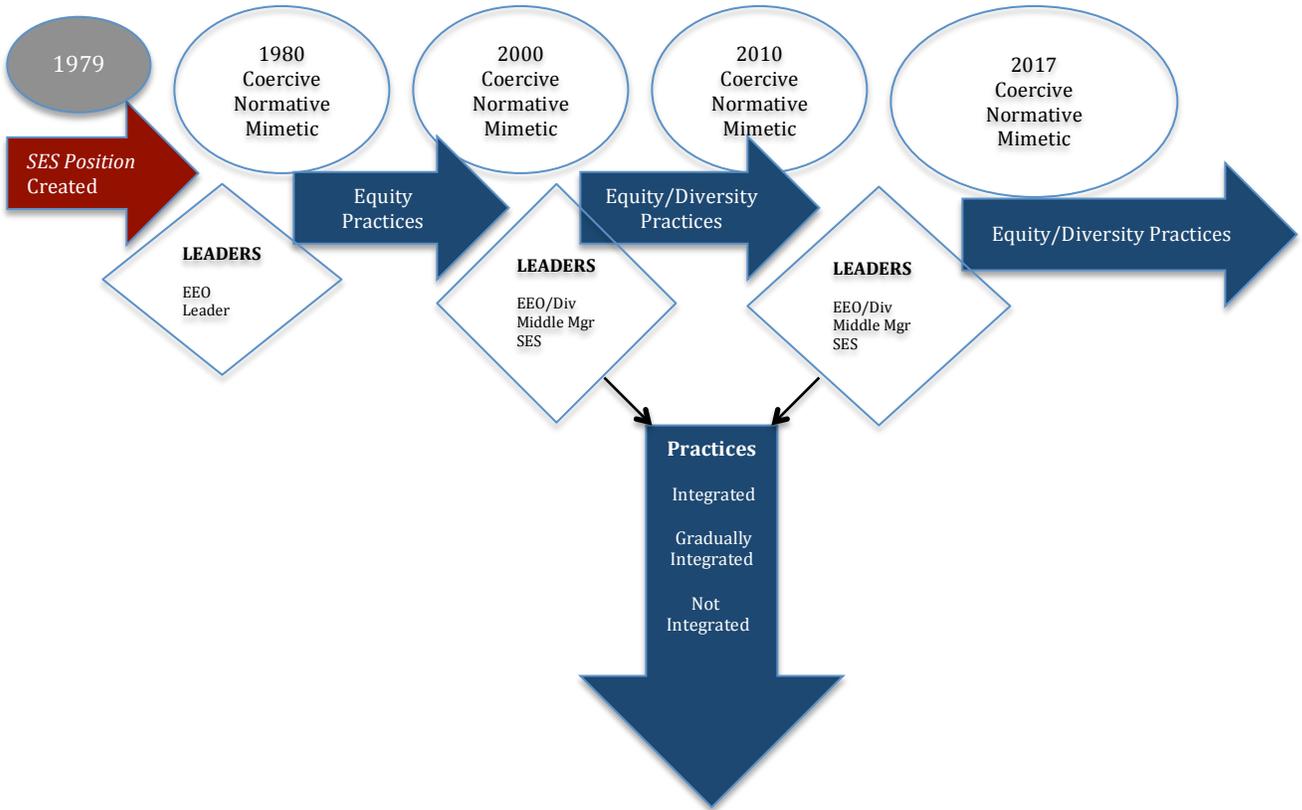


Figure 2

## **Chapter 3 – Research Design and Methodology**

### Introduction

The purpose of this study is to analyze, through in-depth interviews with a sample of agency leaders, how shifts in leaders' responsibilities and how shifts in institutional pressures influence the integration of equity and diversity practices. Researcher supplemented interviews with reports and surveys to analyze the degree to which leaders integrated EEO and diversity practices in federal agencies and how representation of minorities at the head of agencies influenced the integration of practices. It is the expectation of the researcher that findings from this study may give leaders at various levels in organizations a more informed perspective on how influences impact integration of not only equity and diversity but also other practices. To understand how leaders are influenced to integrate practices, this study addresses four questions:

- 1) How did shifts in leaders' responsibilities influence the integration of practices?
- 2) How did shifts in institutional pressures influence the integration of practices?
- 3) To what degree were practices integrated by the three levels of leaders?
- 4) How did the representation of minorities at the SES level influence the integration of practices?

This chapter describes the design and methodology of this research, which includes research approach, research sample, research design, data collection method, analysis and synthesis of data, ethical considerations, issues of trustworthiness, research limitations, and a summary.

## **Research Approach – Qualitative Analysis**

### Rationale for Qualitative Research Design

Researcher conducted a qualitative analysis of data collected in this study. This approach is used to understand concepts and descriptions within historical context (Miles, Huberman, Saldana, 2013). This qualitative study, which includes a small sample size nested in their context for in depth analysis, best responds to the “how” research questions. Qualitative analysis allows researcher to understand data based on the perception of the informants, the social settings, how informants make sense of their environment through social roles and symbols (Miles, Huberman, 1994, Berg 2001, Tilscik, 2010, Miles, Huberman, Saldana 2013). Instead of drawing from narrow quantifiable facts, qualitative techniques allows researcher to explore how informants learn about and make sense of themselves and others (Berg, 2001). This approach is fitting when examining different levels of leaders and how they interpret their interaction with other leaders, changing laws, and shifting pressures. Critical to this research is the ability to understand the backdrop or processes behind the actions of the leaders, understand contextually, have a rich experience of interaction between informant and researcher, and adopt an interpretive position (Bloomberg, Volpe, 2008). Qualitative analysis encompasses those elements and allowing researcher to compare when using case studies.

### Rationale for Case Study Methodology

Researcher used multiple case study as the research methodology to examine the differences and similarities within and between the three levels of leaders and amongst

the same level leaders (Yin, 2003, Yin, 2008, Baxter, Jack, 2008). This methodology allow researcher to gain insight or understand how leaders are influenced to integrate practices to varying degrees. As stated by Volpe and Bloomberg, a case study “is an intensive description and analysis of a phenomenon, social unit, or system bounded by time or place” (Volpe, Bloomberg, 2008).

## **Research Sample**

### Three-level Leaders and Four-Part Typology

Researcher used Four-Part Typology from Edelman et al., which gave a useful way of investigating the experience of the 18 informants interviewed. Researcher considered this number a reasonable representation of the three levels of leaders (EEO/diversity managers, middle managers, and SES) with a greater likelihood of various types and sizes of federal agencies. The case study informants are involved key level positions within the three levels of leadership used in this research. The informants are subject matter experts, decision makers within their discipline, and have tenure in the federal government. This is helpful when requesting historical information from informants. Although the focus of this research is the three levels of leaders, their agency type and size may be helpful. Informants’ agencies are diverse types and sizes, giving researcher a reasonable representation of informants and agencies across the United States. It was the researcher’s expectation that 18 informants were sufficient to collect useful data for complete comparative analysis with reports and surveys.

This framework identifies how leaders' responsibilities and institutional pressures to integrate equity and diversity practices have shifted since Edelman et al.’s research in

1991 (Edelman, Petterson, Chambliss, Erlanger, 1991). Researcher used convenience and snowball sampling to select the 18 leaders to include the three levels of leadership (Miles, Huberman, 1994, Berg, 2001). Researcher initially adopted the strategy of systematic random sampling (Berg, 2001). Using the EEOC website listing names, email addresses, and telephone numbers of EEO and diversity managers, researcher selected every third person until researcher had six to eight informants to contact. Researcher attempted to contact informants by telephone and email. Most informants did not return calls or emails. Once researcher called and emailed each informant three times, researcher selected new informants and began the process again. Those that responded expressed their willingness to participate in this research. Upon checking with either their legal department and/or agency leader, they were not given permission to participate. Some were very apologetic and indicated their agency usually supports students conducting research. Because this strategy yielded little results, researcher used convenience combined with snowball sampling.

Convenience sampling assist researcher in accessing available informants and snowball sampling is used to access additional informants that are difficult to reach (Berg, 2001). Both convenience and snowball sampling are nonrandom and the convenience sample meets a certain criterion, such as three levels of leaders used in this research (Miles, Huberman, 1994). Researcher used EEO and diversity expertise to identify some informants from various agencies across the United States. This approach gave the researcher the opportunity to look across agencies, which makes this exploratory, using their stories and experiences to build scholarly research. With convenience sampling, researcher leaned on social networks when building sample size

but snowball sampling included informants outside of researcher's social networks (Berg, 2001). There are biases connected to this convenience sample. Because bias cannot be measured, inferences made in this research are made only from the experience of the informants participating in this research and not representative of all EEO/diversity managers, middle managers, or SES (Miles, Huberman, 1994).

Researcher contacted previous colleagues and others who worked in the federal government. These contacts provided contact information for informants that would fit within the framework of the three levels of leaders. Once researcher contacted informants, researcher used snowball sampling to access additional informants until researcher received contact information for 21 informants. Whenever researcher lost an informant due to no response, researcher requested existing informants provide additional informants. Of the 21 informants, researcher was able to interview 18 informants that included a cross-section of the three levels of leadership. The criteria used to select informants were:

1. Senior Executive Service as the senior level leader
2. Middle Manager includes program manager, branch head, and department head as the middle level leader
3. EEO and Diversity manager as the EEO/diversity level

There were no delimiting timeframes for the informants selected, to include time in current job or time in federal government (see Table 2).

Table 2 Informant Information

<b>18 INFORMANTS</b>			
YEARS IN POSITION	0-3 yrs - 8	4-7 yrs - 5	8+ yrs - 5
YEARS IN FED AGENCY	From 12 – 36 years (most over 20 yrs)		
GRADES	SES, GS-13, 14, 15 (mostly 14/15)		
# of EEO/Diversity Managers	7		
# of Middle Managers	8		
# of SES	3		
# of Agencies represented	5		
# of Sub-agencies represented	8		

Note: Most informants served in the federal government over 20 years, observed changes in EEO and diversity programs across time, and currently hold top three grades (SES, GS-14/15). Although many held their position for only 0 – 3 years, they were either in the same discipline (career field) and/or in the federal agency for 12 or more years (most over 20 years).

### Three-level Leaders

Shift in leaders' roles as well as how leaders respond to shifting pressures are revealed through interviews. The three groups interviewed, SES, middle manager, and EEO/diversity manager, have varied roles, pressures, experiences, and also have different perceptions (Baker, Edwards, Doidge, 2012). This is not to imply senior leaders from all agencies respond similarly but that each group has their own niche and selecting an adequate number of interviewees was paramount to this research (Baker, Edwards, Doidge, 2012). Interviews included three senior level leaders, eight middle managers, and seven EEO/diversity managers for a total of 18 interviews. To maintain anonymity, informants are given pseudonyms and informants' agencies and type of agencies are not mentioned in this research. Researcher did notice the informants' agency sizes varied from large to small which may or may not be a factor in how leaders respond to pressures. Using Partnership for Public Service's definition based on number of employees. Large agencies have over 15,000 employees, medium between 1,000 and 14,999, and small between 100 and 999. Interviews include responses from three different levels of leaders from numerous agencies, offering a greater understanding of similar and different responses when integrating equity and diversity programs.

During interviews, leaders explain their motivation and pressures when determining the priority of diversity and equity programs, in other words, what led to integrating, gradual, or not integrating practices. The four strategies or four-part typology are Advocate, Team Player, Professional, and Technician (Edelman, et al., 1991). There may be more strategies beyond the four offered in this research and leaders may fit into more than one category. This research examines leader responses and strategies adopted within the context of the four-part typology.

#### Edelman's four-part typology

##### The Advocate

The Advocate places the interest of underrepresented minorities above the priorities of the agency. The Advocate strategy focuses on the needs of the minority group to include addressing discriminatory practices even if it means shaming management. Accommodating, representing, or even placating management is not the Advocate's goal but rather ensuring minority groups receive fair and equitable opportunities. This strategy causes conflict with agency management, which presents a risk to their survival because they work for management. There is some protection for advocates in that non support may be viewed by the public as non support of civil rights.

##### The Team Player

The Team Player's strategy places the priority of the agency above the interest of underrepresented group. If management supports the interest of underrepresented groups, the Team Player will also support underrepresented groups. Conversely, if management shows little or no support for underrepresented groups, the Team Player will do likewise. This strategy is linked to their career goals causing them to avoid conflict with

management but rather appease. Appeasing management may include using practices to address minority underrepresentation or avoiding practices altogether. To preserve managers' prerogative, the strategy is to treat all employees the same rather than offer special programs for underrepresented groups. The Team Player's success is not judged by the achievement of addressing minority underrepresentation but progress up the bureaucratic hierarchy.

#### The Professional

The Professional strategy is to remain neutral toward all parties by constructing equity and diversity as fair and good personnel policy. Unlike the Advocate and Team Player, the loyalty of the Professional is not to underrepresented groups or management but to fairness. Implementing practices to create fairness as an organizational rule breaks through the politics at all levels in the agency. The Professional gains legitimacy with both management and employees throughout the organization because of their neutrality.

#### The Technician

The last strategy is that of the Technician who collects statistics and required EEOC forms. The Technician reports statistics that groups are underrepresented in the agency without developing strategies to improve representation. This individual is uninvolved in creating equity and diversity policy, is not prominent in the agency, and indifferent to political demands of constituents.

Strategies within the four-part typology may overlap and be used by the three levels of leaders to best fit their agenda. Regardless of the overlap, of the four strategies (Advocate, Team Player, Professional, and Technician), the type of strategy used may influence the integration of equity and diversity practices. There is evidence that the

Advocate has the greatest potential for reform. Yet, the individual employing Advocate strategies may not be employed long because they lack alliance with management. The Professional defines and gradually integrates practices over time.

Rather than focus on whether an organization did or did not comply with law, Edelman's study focuses on how organizations respond to internal and environmental normative pressures. Similarly, this research focuses on how key actors respond to shifts in their roles, legal mandates, political influence, agency mission, and establishment of professional norms when integrating equity and diversity practices. All of these factors may influence the strategy leaders use from the four-part typology. Since Edelman et al.'s study, the emphasis of compliance with equity laws has changed. The introduction of diversity initiatives has resulted in less emphasis on compliance with the law and more emphasis on adoption of best equity and diversity practices. With the declining emphasis on compliance over the last 27 years, affirmative action officers have become extinct or reinvented themselves for survival (Kelly, Dobbin, 1998). Subsequently, equity and diversity practice implementation have been delegated to senior leaders who delegated this responsibility to other key actors (middle managers, EEO/diversity managers). Instead of focusing on the response of one position, the affirmative action officer, this research examines how three levels of leaders respond differently when implementing equity and diversity practices. Interview data indicate leaders do not all fit into the four-part typology neatly but there appears to be new constructs within or outside this framework that have not yet been explored. This will be discussed in chapter five.

## **Research Design**

To carry out this research, the following steps were used: literature review, Institutional Review Board (IRB) approval process, pilot interviews, semi structured in depth interviews with 18 informants, documents, and reports. Next, researcher provides a detailed discussion of each step.

### Literature Review

To inform this research, three areas of literature were reviewed: neo institutional theory, equity and diversity literature, and representative bureaucracy. Neoinstitutional theory and equity/diversity literature was reviewed to gain insight on how external and internal pressures influence leaders in federal agencies to adopt and eventually integrate practices differently. Representative bureaucracy was reviewed to understand how representation at the senior level influences how and to what degree actors within the organization integrate practices.

### IRB Approval

After the literature review, researcher developed and successfully defended a proposal for this research that included: background, statement of purpose/research questions outlined in chapter 1, literature review outlined in chapter 2, proposed methodology outlined in chapter 3.

## **Phase 1**

### Pilot Interviews

Researcher role played as interviewer with a skilled research interviewer to increase interview competencies. Next, researcher requested three colleagues participate in a pilot interview and provide feedback (Berg, 2001). The three colleagues included a researcher, a subject matter expert in EEO/diversity, and an SES in the federal government (Berg, 2001). The purpose of the role play and pilot were to examine if the interviewees were able to identify practices being used and identify the mechanisms that influenced their decision to adopt the practices. Additionally, the role play and pilot examined if the interviewees identify whether the practices are being used, projected to be used, or symbolically integrated. Although these were the basis for this research, pilot interviews yielded other information significant for this study. Feedback received included some interview questions seemed redundant, the length of the interview was not too long or too short, the definition of middle manager needed to be clearly defined and expanded, and questions were revised for clarity. Their feedback was used to edit the interview questions.

### Preparing for Interviews

Interviews are considered a “social performance” or “face-to-face interaction performance” in that roles are played symbolically between the interviewer and interviewee (Berg, 2001). Interviews go beyond an exchange of words for information but create a climate of mutual exchange (Berg, 2001). Of the different types of interviews, this research used semi structured interviews which involves the use of predetermined questions and topics based on the nature of the investigation, asked in a

systematic order, and allowing the interviewee to elaborate or even return to a previously asked question (Berg, 2001). In some instances, one question may trigger a thought, causing the interviewee to digress (Berg, 2001). Semi structured interviews are a way to address assumptions by understanding influences and other factors that result in certain responses and behaviors (Berg, 2001). Results from interviews provided an opportunity to compare and contrast responses and behaviors, which is key in this research on how leaders at different levels respond to external and internal pressures.

To add to the results of the interviews for more comprehensive information, researcher included questions that are essential, extra, throw away, and probing (Berg, 2001). Essential questions focus on the research questions, extra questions are reworded essential questions to check for reliability, throw away questions may be rapport building questions at the beginning of the interview, and probing questions are designed to draw out a more complete story (Berg, 2001). The wording and sequence of the questions was designed to draw out a complete and honest story by motivating rather than inhibiting the informant's response and involvement (Berg, 2001). It was helpful that the researcher understood the informant's environment in the federal government to benefit the interview process. Also, connecting with the informant was more successful as the researcher avoided two questions in one, extremely long or complex questions, and affective questions that may incite emotional responses (Berg, 2001). That latter was critical due to the sensitive topic of equity and diversity programs being the focus of this study.

### The Process

Using a checklist of five questions to assess an instrument guided the process of developing interview questions (Chadwick et al., 1984).

- 1-Has the researcher included all the questions necessary to test the research hypothesis (questions)?
- 2-Do the questions elicit the types of responses that were anticipated?
- 3-Is the language of the research instrument meaningful to the respondents?
- 4-Are there other problems with the questions, such as double meaning or multiple issues embedded in a single question?
- 5-Does the interview guide, as developed, help to motivate respondents to participate in the study?

Having worked in the role of middle manager and EEO/diversity manager and at federal agencies, researcher has both advantages and disadvantages. Being familiar with the environment, researcher understood many acronyms and jargons used. Researcher also may have gained access to those who referred some informants. On the other hand, being from this environment, researcher observed for informant's being reticent and researcher bias. Notwithstanding, personal advantages or disadvantages, will not replace the need for critical examination of the interview questions and the process before conducting interviews (Berg, 2001).

## **Phase 2**

### Scheduling Interviews

Once the edits were completed, researcher initially attempted to contact informants through the EEOC website list of EEO/diversity managers. Researcher contacted potential informants by email and telephone, requesting interviews. If there were no responses, another email was sent one week later and potential informants were called weekly for three to four weeks. If there was no response after three to four weeks, researcher selected new informants and began the process again. This approach did not yield any results and researcher discontinued the systematic random approach. The few informants that were willing to interview, later cancelled their interview due to their inability to receive approval from agency leaders or their legal department. Researcher added the convenience strategy, contacting individuals known to researcher. Researcher requested contact information of those working at the three levels of leadership. Next, snowball strategy was used when speaking with informants; researcher requested contact information of others that worked within the three levels of leadership. Once informants were identified, informants were emailed requesting a 30 to 45-minute interview. Informants, with the exception of two, were willing to participate with the agreement that their identity and agency remained anonymous. Researcher decided it was best to have all informants remain anonymous. Informants were emailed a consent form and tentatively scheduled for interviews. Once researcher received the consent form, usually within five days, informants were contacted by telephone for semi structured, in depth interviews. Researcher continued this process until 18 leaders from the three-levels of leaders were interviewed.

### Conducting Interviews

Semi structured interviews were conducted telephonically with 18 informants from November 2017 through March 2018. Interview questions were framed to ask leaders if practices were being used and to identify the mechanisms that influenced their decision to adopt the practices (Appendix E). Questions were also framed to ask whether the practices were currently being used, projected to be used, or symbolically integrated and supporting documents of those practices. Following every interview, researcher reviewed the informants' responses with informant to confirm responses were accurately documented. Two informants provided documents. Lastly, conducting a comparison across three-levels of leadership will increase our understanding of similarities and differences to offer a more robust research outcome (Yin, 2013, Yanow, 2014).

## **Phase 3 – Data Collection**

### Interviews

Researcher used laptop to type responses during interviews. Interviews were stored in password-protected folder. Informants' names were not placed on interview data but level of leadership was used for identification. As informants completed interviews, researcher immediately coded informant for ease in later coding and categorizing data.

### Documents and Reports

Researcher collected reports and documents for fiscal years 2004 through 2017 (MD 715) and 2008 through 2016 (FEVS) for qualitative interpretive analysis. The requirement for annual MD 715 reports began in 2003 with the first report due in 2004

and agencies began participating in the FEVS in 2008. Researcher collected reports once informants were identified, from December 2017 through June 2018. The reports include the Management Directive 715 (MD 715) and Federal Employee Viewpoint Surveys (FEVS). The MD 715 report is usually accessible on the agency website or EEOC. When researcher initially began accessing MD 715 reports in 2013 through 2015, the reports were available to the general public and posted on agencies' public website. When researcher attempted to access these reports in 2017, the majority of informant's agencies no longer posted reports on their public website. Instead, to access the report, a government access card is now required for the majority of the agencies included in this research. Researcher accessed as many reports possible through internet searches and a few agency websites. Researcher also requested reports from informants and received a report from one informant that covered one year. The MD 715 is considered by the EEOC as the agencies' report card of the overall EEO and diversity health of the agency. Some agencies included in this research are not required to complete a report for various reasons. The FEV surveys, which includes responses to questions relevant to equity and diversity from employees, were accessible on the OPM website but not all agencies participated in the survey for various reasons. When survey data was not available, researcher used the report of FEVS data from the Partnership for Public Service 2016 list of Best Places to Work in the Federal Government (Best Places to Work.org, 2016). This report includes responses to questions relevant to equity and diversity from employees. Triangulation of these documents and interviews enhances comparative analysis that corroborates, confirms or disconfirms evidence and informs our understanding within context of how mechanisms influence practices (Sauder, Espeland, 2009).

The MD 715 require agencies report equity and diversity programs, practices, and initiatives they have adopted and are currently using in their organization or plan to use in the future (MD 715 Annual Report) (OPM website, 2016) (Appendix F). On October 1, 2003, the Equal Employment Opportunity Commission (EEOC) created guidelines for agencies to complete the MD 715, superseding MD 712, 713, and 714. The MD 715 report also included the agency head data to use addressing how representation influence practices. When MD 715 data were not available for agency head information, researcher used several websites including agency websites, OPM, and internet searches. The Federal Employee Viewpoint Surveys (FEVS) is a survey available to most federal government employees. Every year, employees within the civil service are asked to participate in the survey by giving their opinion of how their agency is doing in numerous categories. One of the categories includes questions on equity and diversity practices. Agency leaders are the focus of this research, but insight from employees provides a 360-degree view of not only activities leaders say they are doing, but what recipients of these activities say. If leaders and employees view activities similarly, this will further strengthen findings in agency leaders' interview responses. Survey results include four questions (#34, 38, 45, and 55) on equity and diversity practices in the workplace. The four questions are:

(34) Policies and programs promote diversity in the workplace (e.g. recruiting minorities and women, training in awareness of diversity issues, mentoring).

(38) Prohibited Personnel Practices (e.g. illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated.

(45) My supervisor is committed to a workforce representative of all segments of society.

(55) Supervisors work well with employees of different backgrounds.

The response options are: strongly agree, agree, neither agree nor disagree, disagree, strongly disagree, don't know. Because reports used in this research focus solely on responses from leaders within agencies, how employees view or interpret practices and mention leaders in these surveys may further enhance this research.

### **Methods for Data Analysis and Synthesis**

Documents and interview data used in this research were analyzed through interpretive analysis, using a deductive and inductive approach (Berg, 2001). Themes are selected before analysis, which is deductive, as this approach represents a more patterned response to meaning within data (Berg, 2001). Researcher also uses an inductive approach discovering new themes (Berg, 2001).

Using Miles and Huberman's Components of Data Analysis: Interactive Model, researcher identified relationships and trends relating to this research (Huberman, Miles, 1994). The three main components are data reduction, data display, and drawing and verifying conclusions (Huberman, Miles, 1994). This research uses a combination of word and themes for better understanding of patterns and meanings in text. With a total of 158 documents, including interviews, researcher reduced data through analysis by summarizing and categorizing data. To increase validity and reliability, researcher must describe what was done, why, and how, in an exhaustive manner. The description should allow others to duplicate resulting in the same outcome (Berg, 2001). Using Miles, and Huberman's data analysis model, researcher will describe how data were analyzed.

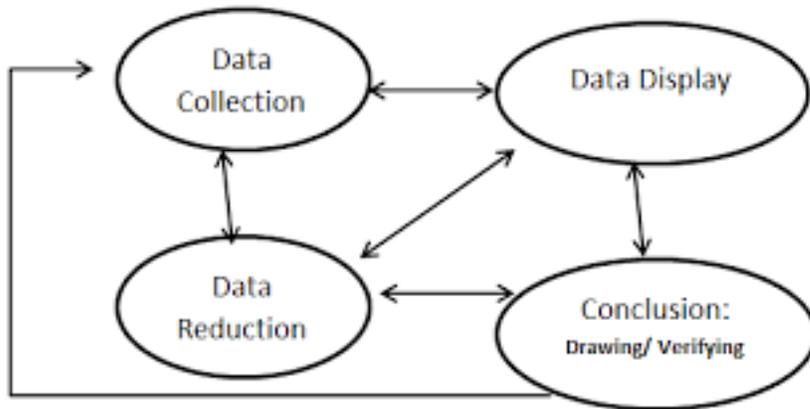


Figure 3 Miles and Huberman, 1994

Miles and Huberman's model includes data reduction that occurs throughout the analysis process. Researcher created a coding scheme based on interview questions and the conceptual framework (Fig 2). There were emerging descriptors during the first level of coding. Data was also placed under different, more appropriate coding during the second level of coding as well as some data was placed in more than one coding category. Researcher made notes throughout the process as data was placed under other codes or under more than one code. Notes were made to remind researcher to review data again to ensure coding was appropriate. Questions and informants' responses were placed on matrices as researcher reduced data without significant loss of information (Miles Huberman, Saldana, 2013). Placing responses to questions on matrices allowed for display and further analysis.

Throughout this process, researcher kept a journal of reflective remarks and thoughts from the interviews, research notes, read and reread responses to interview questions and how they were coded. This resulted in further sorting and extending coding of data. Details of coding are discussed next.

## **Coding and Categorizing Data**

### **Coding Interview Data**

There was a significant amount of interview data and to place in manageable chunks, researcher initially created a Word document for each interview question. The chunks of data varied in size from words to entire paragraphs. Researcher transcribed all responses for interview question number one on a Word document and continued until there was a document for each interview question. Duplicate copies were made for each interview question to allow researcher to code data numerous times, checking for emerging themes. Next, researcher began coding the documents (fig 6). Codes help manage, organize, and retrieve themes (Miles, Huberman 1994). Responses were coded using pattern and analytic coding as researcher analyze for similarities, differences, and further interpretations (Miles, Huberman, Saldana, 2013). To describe the coding and analysis of interview data, researcher will use interview question five as an example. To preserve anonymity, informants were given pseudonyms (see Figure 4), the gender identity may or may not be correct.

Figure 4 Informants' Pseudonyms

<b>EEO/DIV LEVEL LEADERS</b>
ISABEL
ALEX
OPHELIA
STAN
INGRID
SHE LILLY
CAMILLE
<b>MIDDLE MANAGER LEVEL LEADERS</b>
DEAN
LENNY
JOSE
AGNES
WILLA
NATE
ALENA
SERGIO
<b>SENIOR LEVEL LEADERS</b>
NADINE
ALICIA
MITCH

### First – level Coding

Researcher began with descriptive codes to organize data. Each interview question had a set of codes. Most interview questions' used the same codes. Once data were coded using descriptive codes, researcher coded same data again to see if new codes emerged. To display data, matrices were created based on interview questions.

**Interview Question #5** - What programs do you have that addresses minority representation?

First and Second level coding for the question included:

**Figure 5 First and Second Level Coding – Interview Data**

COER Coercive	LEG Legal	LAW Law	MAND Mandate	RULE Rule/Pol	MIME Mimetic	BESPR Best Prac	COPY Copy	NORM Norm	OFC Office
PROF Profession	CERT Certific	EEO EEO	EO EO	DIV Diversity	MIN Minority	RACE Race	OTH Other	EEO/div EEO/div	SES SES
MM Mid Mgr	INT Integrated	GRADINT Grad Integ	NOTINT Not integ						

### Second – level Coding

When reviewing data on matrices, researcher looked for themes and created inferential codes as they emerged. Because the informants' responses often included

other data not related to the specific question but a part of the research question, codes included in interview question five, were also included in other interview questions. For example, interview question 14 provides the number of years the program has existed. Responses to this question would include coding to identify the degree practices are integrated (codes INT, GRADINT, and NOTINT). These codes emerged prior to coding question 14. Data were placed on new matrices for interpretive analysis of how the interview questions are connected to the conceptual framework and research questions. A sample matrix (table 3) includes the interview question, informant, informant responses with coding, and the research questions it may answer.

Table 3 Sample Matrix A

Interview Question #5: What programs do you have that addresses minority representation?		
Isabel	OTH - In Personnel or HR office, they pull the numbers OTH -There are mentoring programs – not specifically for minorities EO/INT-EO Counselors are required to receive 32 hours and 8 hour refresher – 10 yrs + EEO/INT/MAND-EEO Training mandated– 10 yrs + OTH-Intern program for college students OTH/INT-Climate Assessments – 10 yrs +	Research Questions 2-How do shifts in institutional pressure influence integration of practices? 3-To what degree are practices integrated?

### Connecting Interview Questions with Research Questions

Next, to link interview questions to research questions, researcher created individual Excel spreadsheets each with a research question. Researcher created matrices to further organize data and reduce data not applicable to this study. The sample matrix includes many OTH (other) categories. These categories were further analyzed and placed in existing coding if appropriate or remain in OTH coding and placed on the Word document with other unused data. Also, to further organize data, informants were color coded according to their level of leadership (purple EEO/diversity leader, turquoise middle leader, and gold SES leader). Data on matrices with interview questions was

analyzed for verifying conclusions. Matrices were created on Excel spreadsheets with interview questions and corresponding data. Sample matrix (table 3a) includes the interview question, informant, and data that respond to the question.

Table 3a Sample Matrix B

3-To what degree are practices integrated?		
Case	#5-Programs and Dedicated EEO/Div Ofc	#14-Years Prog Exist
<b>EEO/DIV LEVEL LEADERS</b>		
Isabel		
	1-Barrier Analysis Wkg Gp	0-2 yrs
	2-EEO Training	10+ yrs
	3-Climate Assessment	10+ yrs
	4-EEO/Div Ofc	10+ yrs

**Figure 6 Interview Coding Process** used for each question (example of interview question #5):

<b>1-Data Collection:</b>	
Interview responses for question #5	Organize – Word document with question and informants responses
<b>2-Data Reduction:</b>	
	1 <sup>st</sup> level coding question #5 responses (repeat)
<b>3-Data Display:</b>	
	Matrix for question #5
<b>4-Data Reduction:</b>	
	2 <sup>nd</sup> level coding question #5 response
<b>5-Data Display:</b>	
	Matrix for question #5 (repeat steps 4 and 5)
<b>6-Drawing/Verifying Conclusions:</b>	
	Analysis to link interview questions to research questions
<b>7-Data Reduction:</b>	
	Linking interview questions to research questions
<b>8-Data Display:</b>	
	Interview questions linked to research questions
<b>9-Drawing/Verifying Conclusions:</b>	
	Linking interview questions to research questions
<b>10-Data Reduction:</b>	
	Analysis of non applicable data for usability
<b>11-Data Display:</b>	

	Interview questions linked to research questions
<b>12-Drawing/Verifying Conclusions:</b>	
	Interview questions linked to research questions

#### Categorization of MD 715 and FEVS Data

Data from MD 715 and FEVS were gradually added to spreadsheets with interview data. First researcher created MD 715 spreadsheets with narratives from selected sections of the report identifying deficiencies. The selected sections of the report used were Part G, Essential Elements A through E. This section was selected because it provides specific data of practices, programs, and initiatives adopted and integrated by agencies. The MD 715 Part G, Essential Elements A through E provides the status of whether the agency adopted and integrated practices or did not adopt and integrate practices. Researcher coded and combined the MD 715 data by informants' agencies. Coding used was 'yes' or 'no' based on the compliance within the categories listed under each Essential Element in the MD 715 report (e.g. Compliance Indicator B2 – reporting structure for EEO suitable for successful program). Next, reports were combined and organized by informants' agencies and year. Researcher conducted analysis on the different spreadsheets and created a spreadsheet that tallies total number of practices and identified and whether they were integrated, gradually integrated, or not integrated. The analysis of the reports includes how different leadership levels are mentioned or not mentioned. Researcher transcribed the narratives from the report onto a spreadsheet for the categories indicating agencies did not adopt and integrate the practice. Next, researcher analyzed data on the FEV surveys.

The first spreadsheet for FEVS data included percentage of responses to each question for each leader's agency by year. Data was later transferred to Excel spreadsheet for easier analysis. Analysis of FEVS results from employees includes how different levels of leadership are mentioned. Researcher analyzed data within and outside of different levels of leaders. Often researcher conducted blind analysis of data by creating spreadsheets with data but not identifying which informant or level of leader. This was done to challenge researcher bias. Researcher continued to create spreadsheet variations to analyze for similarities and differences across informants, across levels of leaders, and across years. Clusters, patterns, and themes continued to emerge and form that addressed the conceptual framework of this study.

#### Categorization of Four-Part Typology

Researcher also reviewed responses to interview questions numerous times from each informant to analyze how they fit within the four-part typology. First researcher conducted two blind reviews of responses to challenge biases. During the second blind review, researcher identified strategy used according to the four-part typology. Researcher reviewed responses (non-blind review) several times and identified strategy used according to the four-part typology. Researcher coded responses and categorized informants into four-part typology. Researcher reviewed the coded data, identified themes, and summarized informants' responses according to the strategies employed. This process was repeated where researcher conducted blind reviews again. As new themes emerged, some informant's strategies would change, placing them in a different category.

Similar to the categorization used by Edelman et al. of Affirmative Action Officers as Advocate, Team Player, Professional, or Technician, researcher used interview results to categorize 18 leaders within the four-part typology and examined how pressures influenced them to integrate programs differently. To preserve anonymity, the researcher may or may not have used the correct gender for each leader. For ease in tracking informants, researcher assigned each informant a pseudonym. Lastly, researcher analyzed and synthesized data enough to begin to provide findings in chapter four.

### **Ethical Consideration**

This study ensured protection and rights of informants by first receiving informed consent and allowing informants to discontinue participation at any time during this study. Researcher kept the identity characteristics of the informants and their organization confidential. Researcher also checked with Chair when unsure if vital information for research would compromise anonymity. Additionally, informants' interviews and consent documents are kept in a password-protected folder.

### **Issues of Trustworthiness**

Researcher sought to control for potential biases throughout the design, implementation, and analysis of study by consulting with Chair.

### **Limitations**

This study's limitation, which is a common critique to qualitative research methods, includes the researchers' bias, sampling bias, and subjective interpretation as a

previous federal employee in EEO/diversity (Volpe, Bloomberg). Researcher included reports and surveys to triangulate data and reduce subjective interpretation. Another limitation may be issues with the MD 715 report. The report does not always clearly address gradual integration of practices. For some practices, either the agency has or has not integrated a practice or policy. The report does, however, indicate the reason projected plans to create the practice or policy. One reason often identified by agencies for not having a policy is there was a change of leadership and the new leader had not signed the policy. Researcher expected the EEO managers who are owners of the programs, practices, and initiatives to be subject to biases by being protective of their programs and not reveal deficiencies. That may have occurred for some, but many revealed their deficiencies. The FEVS identifies what employees perceive but not why. Other limitations may include loss of reports due to attrition. There was an example of an EEO/diversity manager who was relatively new to the position and unable to locate previous MD 715 reports. Informants, due to the nature of government and the emphasis for confidentiality, may have censored what they shared. Also, researcher sensed there was a heightened level of mistrust in federal agencies. Not only because informants who were initially willing to interview declined stating their legal office or higher level of management would not give them permission, but also the lack of MD 715 reports posted on agency websites. Some participants that declined apologetically stated they usually participate and are supportive of students conducting research.

Lastly, Edelman et al.'s study consisted of five cases, within the public sector and education, which included interviews, affirmative action plans, newspapers, and press releases of the organizations' response to the implementation of EEO/AA policies. The

informant, newspaper, and press releases provided an account of how the informants implemented programs and policies. Unlike Edelman et al.'s study, the element of the media and external constituents' account of how equity and diversity practices were implemented was absent from this research. Informants in this research gave their own account of how and to what degree practices were integrated, which may be insufficient to classify informants. Perhaps strategies may differ depending on the informants' audience. For example, Team Players might change their strategy to Professional to give the general public and constituents the impression that their priority is fairness for all. Additionally, to better classify an informant, longer or multiple interviews and observations of their interaction in the workplace may yield different results.

### **Chapter Summary**

In summary, this chapter includes the research method for this study. This qualitative case study method is used to identify how shifts in leaders' roles and institutional pressures and SES representation influence the degree practices are integrated. Leaders vary in the degree they integrate practices. Researcher used convenience and snowball sampling when selecting the 18 informants. Data collected and triangulated includes interviews, reports, and surveys. A literature review was conducted to formulate a conceptual framework for the design and analysis part of this study. The analysis identifies findings from patterns, themes, and categories. Conclusions are drawn from a comparison of literature and analysis of data. Researcher's expectation is that this study would contribute understanding of how shifting pressures, shifting roles of leaders, and representation at the SES level influence three levels of

leaders to integrate practices differently. In addition to understanding the above, researcher hopes this study will provide understanding to other disciplines beyond equity and diversity practices.

Comparative analysis is appropriate for this research in order to draw comparisons, tease out generalizations, and understand different and similar responses of leaders' adoption and institutionalization of different practices in two agencies (Jensen, Rodgers, 2001) (Yin, 2003). Because case studies illuminate how decisions are taken, this method will offer insight into broader perspectives of how different levels of leadership respond to various pressures (Jensen, Rodgers, 2001) (Yin, 2009).

## Chapter 4 – Findings - Introduction

The purpose of this study is to analyze, through in-depth interviews with a sample of agency leaders, how shifts in leaders' responsibilities and how shifts in institutional pressures influenced the integration of equity and diversity practices to address SES minority representation. Integration of equity and diversity practices have a direct or indirect influence over leaders and agencies' ability to address the issue of underrepresentation and eliminate barriers that prevent minorities from entering into SES positions. Researcher supplemented interviews with reports and surveys to analyze the degree to which leaders integrated EEO and diversity practices in federal agencies and how representation of minorities at the head of agencies influenced the integration of practices. This research uses data from interviews with EEO and diversity professionals, middle managers, and Senior Executive Service. Because researcher used convenience and snowball sampling, inferences made in this research are made only from the experience of the informants participating in this research and not representative of all EEO/diversity managers, middle managers, or SES. In addition to interviews, this research uses Management Directive (MD) 715 reports and Federal Employee Viewpoint Surveys (FEVS) from selected agencies. The MD 715 reports ranged from fiscal years 2004 through 2017.<sup>1</sup>

This chapter consists of key findings obtained from interviews, reports, and surveys. Part one includes findings, using the Four-Part Typology from Edelman et al., identifying how leaders' responsibilities and institutional pressures to integrate practices shifted since their research in 1991 (Edelman, Petterson, Chambliss, Erlanger, 1991).

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<sup>1</sup> Fiscal year is from October 1st of the previous year through September 30th of the current year (e.g.

Part two consists of two sections with additional findings to support the Four-Part Typology analysis. Ten major findings emerge from this research. Section one includes findings of how shifts in leaders' responsibilities influence the integration of practices. Findings in section two include how shifts in pressures, and the degree to which institutional pressures influence leaders to integrate practices. Part three includes findings of the degree to which leaders integrated practices. Lastly, part four's findings includes how representation of minorities at SES/head of agency influenced the integration of practices.

## Chapter Four

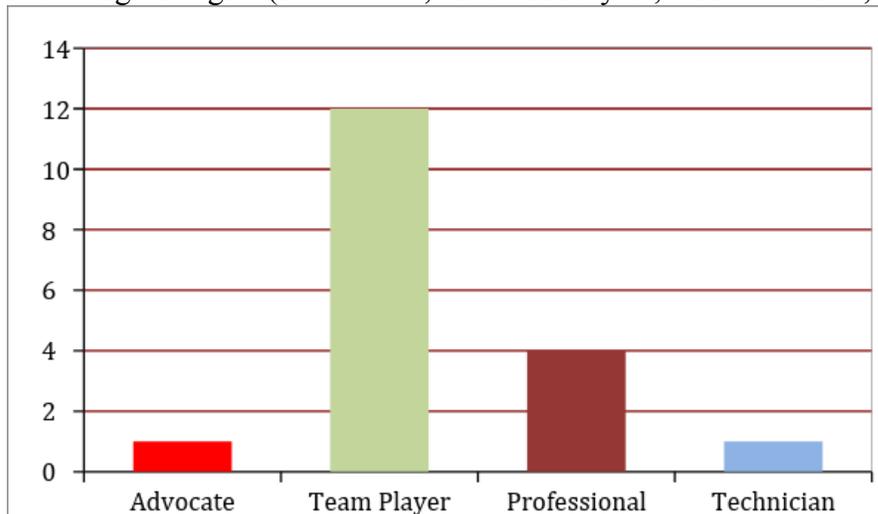
### Part 1 – Four-Part Typology – Institutional Pressures and Integrating Practices: Leaders’ Responses

Question 1: How did shifts in leaders’ responsibilities influence the integration of practices?

Question 2: How did shifts in institutional pressures influence the integration of practices?

**Finding 1:** Since the research of Edelman et al., EEO/Diversity managers and middle managers respond similarly when integrating practices. Fewer leaders, one out of 18 (6%), used the Advocate strategy compared to Edelman et al. two out of five (40%). More, 12 out of 18 (67%), used the Team Player strategy compared to Edelman et al. one out of five (20%), when integrating practices. Four used the Professional strategy, and one used the Technician strategy (see Figure 7). Since Edelman et al.’s, research, legal mandates continue to influence the integration of practices, yet, unlike the research of Edelman et al., pressure to distance programs from race-based initiatives has increased. There are also shifts within institutional pressures as the middle leader responds to normative pressures, resembling the EEO/diversity leader. Also, agency heads appear to exert more or similar influence as institutional pressures exert, when leaders employ strategies to integrate practices.

**Figure 7 Four-Part Typology Chart** – 18 Informants used the following strategies (1 Advocate, 12 Team Players, 4 Professionals, and 1 Technician)



**Introduction: Shifts in Leader's Responsibility and Pressures - Four-Part Typology**

To analyze leader's response to institutional pressures, researcher used Edelman et al.'s four-part typology strategy to examine how similar pressures influenced the extent to which senior level, middle level, EEO Specialists and Diversity Managers institutionalized equity and diversity practices in agencies (Edelman, Petterson, Chambliss, Erlanger, 1991). Edelman et al.'s study focused on how Affirmative Action Officers responded to internal and environmental normative mechanisms when implementing practices. Edelman et al. gives the degree and differences in which programs are adopted and integrated. This research examines the degree and differences in which programs are adopted and integrated across time and added the shift in responsibilities and shifts in institutional pressures across time. Edelman et al.'s study suggests legal compliance should be understood as a process evolving over time and external and internal pressures influence the degree to which organizations comply. Influences include political climate, Affirmative Action Officers' interpretation of the law, their role conception, and professional aspirations (Edelman et al., 1991). This research similarly examines how these pressures influence the degree to which leaders integrated programs. The first section is a categorization of leaders followed by a summary of shifts identified within the categorizations. Four shifts are identified: 1) fewer Advocate and more Team Player strategies are used, 2) less EEO practices and more inclusive practices, 3) shifts in institutional pressures, and 4) shifts from institutional pressures.

### **Categorization of Leaders**

Similar to the categorization used by Edelman et al. of Affirmative Action Officers as Advocate, Team Player, Professional, or Technician, section one use interview results to categorize 18 leaders within the four-part typology and examine how pressures influence them to integrate programs differently. To preserve anonymity, the researcher may or may not have used the correct gender for each leader. For ease in tracking informants, researcher assigned each informant a pseudonym.

### **The Advocate**

The Advocate places the interest of underrepresented minorities above the priorities of the agency. This strategy causes conflict with agency management, which presents a risk to their survival because they work for management (Edelman et al., 1991). There is one informant who used the Advocate strategy. This case demonstrated resistance to agency management in the interests of social reform. A middle manager, Nate, attempted to get Title VII laws established within the agency. Nate stated the agency made progress under the Obama Administration but the progress slowed under the Trump Administration. The area of focus for Nate was hiring practices and programs. According to Nate, management requested a meeting to discuss an issue; he was told that he hires too many minorities. Nate's response to management was that he was told that there were offices within the agency that did not hire minorities. His response to management was a way to highlight a hiring practice that was not being addressed. While management opposed him for hiring too many minorities, management did not oppose offices that did not hire minorities. Management did not respond to his

allegation. Nate stated management did not mention qualifications when addressing him hiring too many minorities. "If they weren't qualified, that would be an issue" stated Nate. Nate followed up with a meeting by providing a demographic report to management of his department and there were 50% minorities and 50% non-minorities, 50% female and 50% male. According to Nate, he hired the most qualified, which happens to be a diverse group. In one particular situation, since management continued to address Nate hiring minorities, he submitted a non-minority candidate to management. Management rejected the candidate, assuming the candidate was a minority. Nate submitted another candidate and management asked him the candidate's race. Nate's response to management was, "I think the candidate is a non-minority". Management, an SES, authorized the hire of the candidate, thought to be a non-minority. The candidate, highly qualified and proven to be the "brightest and sharpest employee" according to Nate, is actually a minority. The same employee has adopted a similar practice of hiring the best qualified and now has a racially diverse staff. Nate stated his staff is loyal and grateful. According to the Advocate strategy, the Advocate denies allegiance to management and takes an aggressive view of what constitutes compliance (Edelman et al., 1991). If my case studies are an indicator of the role of Advocate in federal agencies, Advocates are fading into obscurity. Of the 18 interviews, only one informant used the Advocate strategy. Several informants spoke of their discontentment with management's integration or lack of integration of programs and practices, yet none rose to the level of action. Most of the informants employed the Team Player strategy.

### **The Team Player**

The Team Player's strategy places the priority of the agency above the interest of underrepresented group. This strategy is linked to their career goals causing them to avoid conflict with management but rather appease. Appeasing management may include using practices to address minority underrepresentation or avoiding practices altogether. To preserve managers' prerogatives, the strategy is to treat all employees the same rather than offer special programs for underrepresented groups. The Team Player's success is not judge by the achievement of addressing minority underrepresentation but progress up the bureaucratic hierarchy (Edelman et al., 1991).

There are twelve informants who used the Team Player strategy. Stan is an EEO/Diversity Manager who states there are programs but programs to address minority underrepresentation are at the bottom of the priority list. There are EEO training programs and customized training conducted in response to an EEO violation or issue. Other programs include mentoring and internship programs but they are not designed to address minority underrepresentation. Stan did not indicate any resistance to management's lack of programs to address minority representation but instead offered programs for everyone.

Whereas Stan provided programs for everyone, Camille, also an EEO/Diversity Manager, provided programs for underrepresented groups in the field offices but not at headquarters level where she worked. She was not aware if the programs were implemented in the field offices, as she stated, "The programs are supposedly conducted at the field levels". The mandated programs address the underrepresentation of Hispanic/Latino, African American, American Indian/Native American, Asian and

Pacific Islander in their federal agency. Camille did not indicate any planned action to integrate these programs at the headquarters level or verify if the programs were implemented at the field level. There appeared to be a passive approach toward non-existing programs at the headquarters level. This may be due to symbolic integration is considered an acceptable practice. Often, the Team Players identified their discontentment with programs or the lack of programs but displayed a passive approach toward affecting change.

Dean, a middle manager, also displayed a passive approach. He stated there are programs that provide opportunities for advancement to SES, internships, and mentoring programs. None of the programs address minority representation but are open to everyone. Dean shares his experiences regarding opportunities within the agency. He stated minority GS 15s are prevented them from going beyond a certain step in their grade structure whereas non minority GS 15s do not have the same restriction. Dean also stated minorities have college degrees while non minorities in the same grades do not have college degrees. Lastly, Dean stated Acting Directors, all minorities, applied for the Director's job, a non minority was selected. Despite Dean's dissatisfaction with management, he did not indicate any plan to conflict with management, preserving his career.

Similarly, Jose a middle manager, identified issues and progress within the context of his own career progression. He stated the agency hired the first female at the branch level, which may be an indicator of opportunities for minorities, and females. He also stated the demographics have changed over the last decade from white male to increased racial diversity. Jose stated his agency offers SES career programs, which he

has participated in, and mentorship programs but neither address minority representation. The mentorship program focuses more on replacing the aging population. In contrast to Jose and other informants, Willa, Alena, and Sergio, middle managers, did not view themselves as having a role in integrating equity and diversity programs but Willa and Alena view this as the responsibility of the middle manager. Willa and Alena stated their agencies' programs include EEO and diversity training, special observances highlighting guest speakers. Additionally, Alena's agency has a class designed to prepare GS 14 and GS 15 minorities for SES positions. Sergio stated his agency did not have equity or diversity programs, but stated his existing staff is diverse and there is a diverse committee that selects candidates. Those using the Team Player strategy are not viewed as a threat to the agency and will not rock the boat as long as there doesn't appear to be overt discrimination (Edelman et al., 1991).

Those employing Team Player strategies are not limited to EEO/diversity managers and middle managers, but also SES. Nadine, an SES, serves in an advisory role within her agency. Her agency has a significant number of SES because of the type of work performed but there are also a disproportionate number of white males. According to Nadine, the demographic selections are not on purpose but their recruiting strategy is to find the best qualified and not quotas. In the effort to recruit minorities into these specialized positions, there appears to be a dearth of minority candidates. Nadine's agency has received criticism for not awarding proposals to minority serving institutions. Through their facilitated diversity training, Nadine stated they grapple with the challenge of how to make the workforce more racially diverse without diluting the mission. The Team Player strategy of identifying with the agency's priority as long as the agency is

sympathetic to or partly interested in complying with, albeit weak compliance, equity and diversity requirements. Nadine appears partly interested in complying with equity and diversity requirements but not awarding proposals to minority serving institutions results in lack of legitimacy with the minority community (Edelman et al., 1991).

Alicia, an SES, views her role as responsible for integrating equity and diversity programs. She views fair hiring practices, ensuring appropriate information is provided to those interested in SES positions, and development opportunities are equitable as her responsibility and the responsibility of all levels of leadership in the agency. Alicia's agency has a senior leader development program for those interested in SES positions. Yet, in her experience across different federal agencies, she has only seen Special Observances programs but no specific programs to address development of minorities into leadership positions or any robust activities to target minority groups. Team Player strategy may be given considerable autonomy in an agency and the Team Player as with Alicia, works at the highest level in federal civil service position with autonomy, but would not use that autonomy to challenge agency policies and practices (Edelman et al., 1991). Although Alicia strongly believes she is responsible for implementing equity and diversity practices, the degree to which she implements these practices will not exceed or conflict with existing agency practices.

Ingrid, EEO/diversity manager, despite her disagreement with the efficacy of programs, will not conflict with existing agency policies and practices. She endorses her agency leader's position that every leader is responsible for integrating equity and diversity programs instead of specific offices (e.g. EEO, Diversity and Inclusion, and Human Resources) it is a part of their core competencies. But the alignment of programs

seems to weaken the existence of these programs. The diversity and inclusion program is under the leadership of Human Resources (HR) and they realigned Special Emphasis Programs from EEO to HR. With this alignment, Ingrid's EEO office appeals to HR to create measurable programs to address minority representation. Ingrid's office encourages HR to create and establish systems, programs, and policies that will monitor the demographics of candidates, increase minority representation, and increase the number of racial minorities in the candidate pool for SES. Due to the lack of HR's cooperation in creating databases, programs, and policies, it is impossible for Ingrid to identify barriers preventing minorities from entering senior executive level positions. There are no outreach recruitment programs under the diversity program and existing recruitment programs do not address minority representation. Notwithstanding, the agency is viewed as a high performing organization, receives recognition for their best practices they share with other agencies. Programs include diversity councils, strategic plan that includes equity and diversity initiatives, Special Observances program implemented by all offices in the agency, Alternative Dispute Resolution, MD 715 Board, and EEO and diversity training. Ingrid agrees there are many activities (programs) but she has seen no impact of these activities in over a decade. Team Player strategy reduces blatant discrimination but does not result in significant change (Edelman et al., 1991). The agency takes advantage of the ambiguity of legal EEO requirements, realigns responsibilities in HR where compliance is minimized (Edelman et al., 1991). Ophelia, EEO/diversity manager, was difficult to place within the four-part typology because the informant was robotic and expressed neither pleasure nor displeasure with the programs, employees, or agency leadership. She viewed the integration of programs

as her responsibility. The office considered most responsible and influential in integrating their Special Emphasis Programs, diversity councils, and training programs was the agency head. Ophelia did not share her opinion about these programs, positive or negative. Mitch, SES, was also difficult to place in a category. Although he stated race was not a consideration when adopting practices, he considered demographics of his clientele when discussing initiatives. Mitch suggested equity and diversity programs were institutionalized within his agency but he could not identify any programs. There were many ideas and goals expressed but practices weren't adopted and implemented. One goal was to hire and develop a workforce that responded to, serviced, and met the needs of his clients. It is Mitch's expectation that a workforce that mirrored their clients may better service their clients. He is currently working on a program to increase racial diversity amongst candidates and introduced initiatives to recruit from local minority serving institutions but was unclear on what the program encompassed. Mitch ensures panels are diverse when hiring new employees. He attributes the diverse panel as the reason they hire the best qualified and a racially diverse workforce. Team Players remain in the safe zone to avoid conflicting with agency policy whereas Professionals, our next strategy, take a neutral position of fairness and good personnel policy (Edelman et al., 1991).

### **The Professional**

Unlike the Advocate and Team Player, the loyalty of the Professional is not to racial minority groups or management but to fairness. Implementing practices to create fairness as an organizational rule breaks through the politics at all levels in the agency. The Professional gains legitimacy with management and employees impacted by the

programs because of their neutrality (Edelman et al., 1991).

There are four informants who used the Professional strategy. Isabel, EEO/diversity manager, created structures within her agency that consisted of multiple offices implementing, monitoring, or providing oversight and support of programs. Senior leaders were responsible for working groups, establishing goals and roadmaps of expected timelines and outcomes of equity and diversity programs. Programs included working groups that assessed racial disparities, climate surveys to assess the organizational climate, Affirmative Employment Programs, and training. Senior leaders also established various equity and diversity policies as EEO and Diversity managers tracked accountability and implementation of policies with the goal of promoting fairness across the agency. The Professional strategy relies on formal rules, remaining neutral when integrating programs (Edelman et al., 1991). Alex, EEO/diversity manager, remains neutral by implementing mandated programs that promote fairness. Using the MD 715 to identify minority representation and issues of disparity, Alex uses applicable policies to address disparities. Alex also uses conflict resolution options through Alternative Dispute Resolution (mediation) program. One use of this program is to reconcile employee, supervisor, or manager relationship when there are allegations of discriminatory practices. This program is fitting in the Professional strategy because it is not on the side of the employee or management, but on the side of fairness.

Lenny, middle manager, views himself as responsible for integrating programs. He states he assists managers and EEO and diversity managers in identifying methods to find and recruit diverse candidates and implement policies, to include personnel policies and programs. Lenny works with the SES in his agency to identify underrepresented

groups within the agency, recruit from minority serving institutions (colleges and universities). His office has developed recruiting teams that comprise of employees and supervisors from different jobs to conduct target recruiting for underrepresented groups. He is also part of a team that conducts an analysis to pinpoint barriers that impede their progression in creating a diverse workforce. This group monitors the barriers to ensure the same barriers do not exist the following year. Lenny works within the strategy of the Professional using existing policies, creating new policies and programs, and including all levels within the agency when addressing underrepresentation. Their mentoring program is available for all employees and not specifically for underrepresented groups. The above strategy with integrating equity and diversity policy within personnel policy becomes organizational rules, preventing conflicts associated with advocating for either management as the Team Player or the racial minority group as the Advocate, but instead advocating fairness.

Agnes, middle manager, similarly views herself as responsible for integration of programs, combining strategies that include imbedding equity and diversity policies within personnel policies. Her approach is different in that she focuses on external customers, her surrounding community, with an emphasis on policy and representative bureaucracy. Agnes refers those in the position of SES as progressive thinking people, meaning they are looking for ways to improve the agency and ensure the workforce is diverse to serve a diverse community. There is no requirement in Agnes's agency for the workforce to mirror the community yet those in leadership work closely with Human Resources to identify and match their community demographics and meet their needs. Oddly enough, she does not view the EEO and diversity manager as a catalyst in

promoting a diverse workforce. Instead, they track numbers and get involved when the numbers are a cause for concern or there is a complaint. Unlike Lenny, who worked closely with the EEO and diversity manager, Agnes doesn't appear to see the usefulness of that position. Agnes stated the EEO and diversity manager only responded to claims of discrimination but did to address representation within the agency. Agnes's strategy may resemble Advocate strategy because the workforce attempts to resemble the community it serves, but based on the Professional strategy, their efforts do not oppose management or their clientele, but promotes fairness.

### **The Technician**

The last strategy, the Technician, collects statistics and required EEOC forms. The Technician reports statistics that groups are underrepresented in the agency without developing strategies to improve representation. This individual is uninvolved in creating equity and diversity policy, is not prominent in the agency, and indifferent to political demands of constituents (Edelman et al., 1991). There is one example of Technician, EEO and diversity manager, amongst the case studies. The role of Lilly is to conduct workforce analysis by identifying underrepresentation or disparity of minority representation and barriers to opportunities for minorities, using the MD 715, and report findings to agency leadership. Changing her strategy from Technician to Advocate, Lilly identified barriers preventing racial minority groups from opportunities and presented several action plans from 2016 to leadership that should have been implemented. When leadership continued the status quo of doing nothing with the action plans, she quickly transitioned back to Technician, stating, "It's difficult to get them to do anything". Lilly stated her agency, which is considered small, has a significantly high number of SES

whose priority is to focus on external customers or clients. There is one program Lilly's agency focuses on as a top priority, the Presidential Management Fellowship program. This program, open to all employees, is used to provide a fast track career progression for college students within the agency. Lilly continues to provide statistical data, regardless of whether they are used to create policy and programs. The Technician strategy passively supports the agency (Edelman et al., 1991).

### **Summary: Shifts Across Time**

In summary, there are four shifts identified, fewer Advocate and more Team Player strategies are used and researcher also discussed different approaches within the Team Player strategy. This discussion includes how shifts in leaders' responsibilities influence the integration of practices. Other shifts include less EEO practices and more inclusive practices, shifts in institutional pressures, and shifts from institutional pressures.

#### Fewer Advocate More Team Player Strategies

Since research by Edelman et al. in 1991, there are fewer Advocates and two additional leadership levels are included in this research as responsible for integrating equity and diversity programs, middle managers, and Senior Executive Service. Of the five informants interviewed in her study, two used the Advocate strategy, 40% as opposed to 6% in this research. Surprisingly, the only informant who employed the Advocate strategy in this research is a middle manager and not an EEO/diversity manager. Many EEO/diversity managers use the Team Player approach, the most common, 12 out of 18 leaders. With EEO/diversity managers, senior leaders, and middle managers using the Team Player approach, there may be little hope of integrating

practices if met with resistance. The Team Player strategy was coupled with informants securing and/or protecting their positions in the agency. Team Players spoke of or implied there was a need to protect their own professional interests, their jobs.

Professionals were both middle managers and EEO/diversity managers. Although few, four out of 18, Professionals' ability to integrate practices may be the catalyst for the agency as Team Players maintain the practices once integrated. Within the Team Player strategy, there were various approaches that should be mentioned.

#### Approaches Within Team Player Strategy

Within the Team Player strategy, informants had individual approaches to integrating practices. The most common approach is the passive approach when informants integrate practices with or without consideration for race based on management's direction. Within the passive approach, some informants were content with the direction of their senior leaders or agency heads while others were discontent. Others were indifferent or not involved in integrating practices. Even though several informants viewed it as their responsibility to integrate practices, some were not involved in the process. Within the passive approach, two EEO/diversity managers took their responsibility seriously but did not receive the assistance or collaboration necessary from senior leaders or internal departments to integrate their programs.

The lack of assistance or collaboration resulted in the EEO/diversity managers passively waiting for change. Passive approach was identified most often but there were other approaches used by informants that included resistant and robotic. Resistant approach was the Advocate strategy of integrating practices despite management

opposition. Ophelia was identified as robotic because other informants expressed their opinion, perception, or position as it relating to integrating practices. Opinions and perceptions included whether they agreed or disagreed with the implementation or lack of implementation of practices, to include contentment or discontentment with the focus on race. The shift from race to inclusive practices is discussed next.

### Shift in Focus – From EEO Practices to Inclusive Practices

Another shift across time since 1991 is the implementation of programs for all employees without a focus on underrepresented groups. This appears to be a prevalent practice. An EEO/diversity manager stated they do not consider race at all when creating programs. It was almost as if the lack of emphasis on race and underrepresentation was considered a progressive approach. This may partly be influenced by diversity management, which emphasizes a focus on productivity of diverse teams rather than race (Edelman, Fuller, Mara-Dritra, 2001). The term diverse may be defined as diversity of thought, familial, educational, or socio-economic differences. Some informants gave the impression that speaking of race was considered taboo or unacceptable. EEO/diversity managers that did not agree with decreased tracking of racial diversity or not creating programs for underrepresented groups, seemed helpless to affect change. In view of the research conducted by Edelman et al., the EEO position may have weakened. Increased ambiguity in equity and diversity programs makes it difficult for leaders to integrate programs consistently across agencies because there are various interpretations of which programs should be integrated. This leads to another shift, institutional pressures on

practices and leaders and how pressures influence the strategies used to integrate practices. This shift is discussed next.

### Shifts in Institutional Pressures

Shift in institutional pressures may influence how strategies are employed by informants to integrate practices. Practices are already influenced by legal mandates, professionalism, and/or mimicking others. In order to identify how pressures influence informants, two questions are addressed. Since Edelman et al.'s research, how has institutional pressures shifted and does the shift influence the approach used by informants to integrate practices? Since 1991, there are still legal mandates to address minority representation but as diversity programs increased and organizations mimicked one another's practices, the prevalence of equity programs decreased. This may have a significant influence on how informants approach the integration of practices. In this research, the Team Player approach is used significantly more than other approaches while the Advocate approach seems to be the exception or even an anomaly. Team Players identified in this research appease management even if they don't agree. Many informants have worked in the agencies for numerous years and perhaps began their career when the Advocate approach was more popular but shifted their approach as the pressures shifted. During interviews, Team Players that expressed their discontentment with how management's priority was to implement practices for non-substantive outcomes, may have begun their career eager to integrate practices. However, the strategy of Advocate may not have yielded the desired results of job security and career progression, leaving leaders with the most viable option of Team Player.

Another shift within institutional pressures is the rise of the middle manager's role, which appears similar to the EEO/diversity manager. Pressures brought by professionals are understandable within the EEO/diversity discipline with certifications and licenses. Pressures brought by middle managers to integrate practices falls out of the framework of normative pressure yet middle managers' roles and responsibilities resemble EEO/diversity managers. Middle managers appear to operate within the professionalism of EEO/diversity managers without EEO and/or diversity related certifications. Perhaps normative pressure may influence others outside of the professional network to operate within the network. Additional research is necessary to examine shifting roles and responsibilities that place middle managers in a position to be influenced by and to influence normative pressure without credentialing.

#### Shifts From Institutional Pressures

Lastly, there may be a shift away from being influenced by institutional pressures to internal pressures. Informants attribute legal mandates as influencing them to integrate practices, but SES and/or agency heads seem to have a significant influence. Regardless of coercive pressure, the agency head's priorities resulted in compliance taking on a different form. The form was to integrate practices without addressing representation. This may be a shift away from institutional pressure directly influencing these leaders, instead whatever influences the agency head, influences these leaders. With the exception of the Advocate strategy, all approaches employed by informants in this research, including the Team Player, Professional, and Technician, appear to reflect the strategy of their senior leader or agency head. This may mean pressures experienced by

senior leaders and agency heads have a trickle down effect on the three levels of leaders and the degree practices are integrated begins with senior leaders and agency heads. These pressures may include political influence and personal motivation. Additional research, including interviews with both agency heads and leaders within the agency, may provide greater understanding of what pressures influence agency heads and how it's transferred to the leaders when integrating practices. As mentioned earlier, some informants had their own motivation for integrating practices but the strategies they adopted, with the exception of the Advocate strategy, appeared to be in synch with the agency head's priorities.

## Chapter Four

### Part 2, Section 1 - Leaders' Level of Responsibility Influenced the Integration of Practices (Table 4)

Question 1: How did shifts in leaders' responsibilities influence the integration of practices?

**Finding 2:** Middle managers are viewed by all levels of leaders as responsible for the integration of practices. Middle managers integrated more practices (62%) than the EEO/Diversity managers (56%). EEO/Diversity managers were responsible for adopting, implementing, and maintaining most practices while SES did not adopt, implement, maintain, or integrate any practices identified.

#### Introduction: Shifts in Leaders' Responsibility Influence Integration of Practices

This part includes two sections. Section one discusses how shifts in leaders' level of responsibility influence the integration of practices. Section two discusses findings on how shifts in institutional pressures influence the integration of practices.

During interviews, leaders were asked what leader introduced/adopted, implemented, maintained, and/or had the greatest influence over practices. The first part of this section identifies each leader and how they viewed their responsibilities for the practices. Next, researcher summarizes how leaders view their responsibilities and the responsibilities of other leaders. Their views differed significantly from one another, contributing to a greater understanding of which leaders integrate practices and the degree of their involvement.

In table 4, the three levels of leaders identify existing practices that they adopt, implement, and maintain (see figures 8 through 11). To assess which leader has the most influence in adopting, implementing, maintaining, and integrating practices, researcher asked interview questions 9, 10, 11, and 12. EEO/Diversity level leaders identified 18 practices, middle level leaders identified 13 practices, and senior level leaders identified

two practices. When leaders identify the level of responsibility in practices, it may include shared responsibilities with other leaders. In the expanded version of table 4 (Appendix J), leaders identify the programs and indicate whether they or other leaders adopt, implement, maintain, and/or have the greatest influence.

To analyze how leaders' level of responsibilities influence the integration of practices, interview questions included (Appendix E):

- #9 - What level leader introduced/adopted the practice?
- #11 - What level leader implemented the practice?
- #13 - What level leader maintained the practice?
- #14 - What level leader had the most influence over the practice?

**List of Practices Identified by Leaders**

Next, researcher provided a list of practices identified by each leader (informant) during interviews. The lists are organized according to the level of leader (EEO/diversity, middle, and senior level leader). Leaders identified practices and provided researcher the level of leader that introduced/adopted practices, implemented practices, maintained practices, and had the most influence over practices.

Figure 8 identifies practices adopted by leader category

**Leaders Adopted Practices:**

EEO/Diversity Level Leader	56%
Middle Level Leader	46%
Senior Level Leader	0%

Figure 8 Leader with Most Influence – % of Adopted Practices

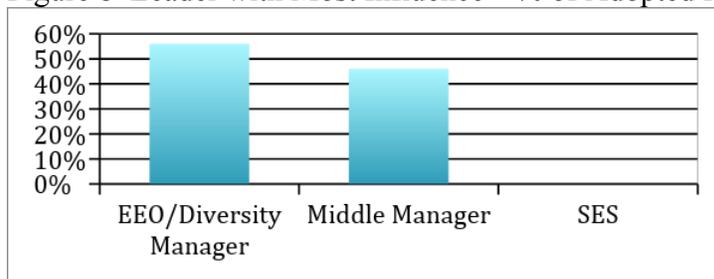


Figure 9 identifies practices implemented by leader category

**Leaders Implemented Practices:**

EEO/Diversity Level Leader	61%
Middle Level Leader	46%
Senior Level Leader	0%

Figure 9 Leader with Most Influence – % of Implemented Practices

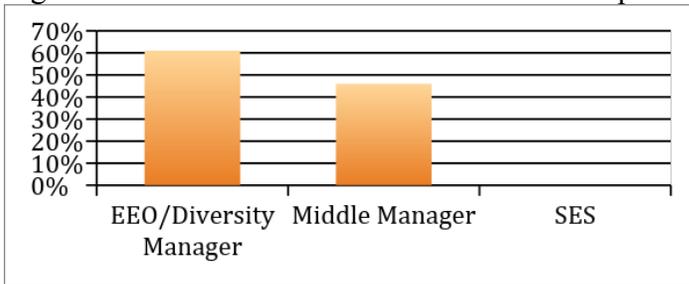


Figure 10 identifies practices maintained by leader category

**Leaders Maintained Practices:**

EEO/Diversity Level Leader	83%
Middle Level Leader	46%
Senior Level Leader	0%

Figure 10 Leader with Most Influence – % of Maintained Practices

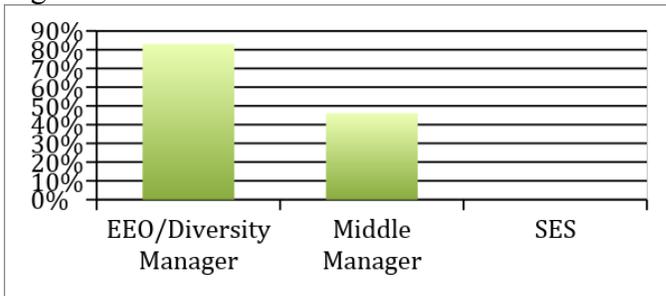


Figure 11 identifies practices most influenced by leaders, by leader category

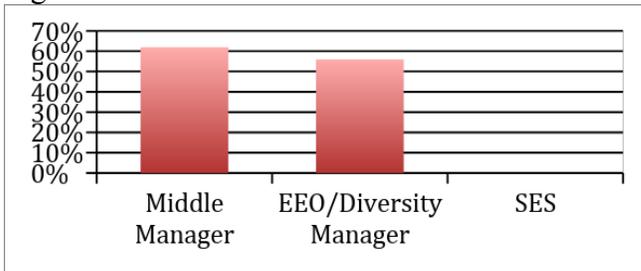
**Leaders with Most Influence Integrating Practices:**

Middle Level Leader 62%

EEO/Diversity Level Leader 56%

Senior Level Leader 0%

Figure 11 Leader with Most Influence - % of Practices Integrated



## Summary

### How Leaders View Their Responsibilities

Of the three-levels of leaders introduced in this research (EEO/Diversity Manager, Middle Manager, and Senior Executive Service), the middle manager was more influential in integrating practices than expected. The EEO/Diversity manager adopted, implemented, and maintained the highest percentage of practices. There was only a ten percent difference between EEO/Diversity and middle managers when asked who was responsible for adopting and implementing practices. However, the gap was significant between EEO/Diversity managers and middle managers responsible for maintaining practices. This should be expected since the EEO/Diversity leader has the greatest responsibility for the EEO/Diversity processes. Surprisingly, middle managers integrated a higher percentage of practices than the EEO/Diversity managers. This indicates middle managers in this study view themselves as having a role in, and influence over, integrating equity and diversity practices in the agency. On the other hand, SES in this study were less involved than expected and perceived themselves as having less responsibility for the integration of practices.

### How Leaders View Other Leaders' Responsibilities

Although the senior level leaders did not identify themselves as responsible for adopting, implementing, or integrating practices, both EEO/Diversity managers and middle managers identified SES as responsible for practices. The EEO/Diversity manager viewed SES as partly responsible for adoption and implementation of practices but almost equal with EEO/Diversity managers when asked who had the most influence

in integrating practices. EEO/Diversity managers did not view middle managers as having a significant responsibility in adopting and implementing practices. When asked which leader had the greatest influence integrating practices, EEO/Diversity managers did not view middle managers as having the greatest influence.

Middle managers viewed SES as moderately responsible for practices. According to middle managers, EEO/Diversity managers are moderately responsible for adopting and implementing practices but significantly responsible for maintaining and having the greatest influence over integrating practices. SES viewed middle managers and EEO/Diversity managers as being equally responsible for adopting, implementing, maintaining, and having the greatest influence over practices.

#### New Findings: Shift in EEO/Diversity Focus

There was an unexpected finding in reference to the focus of practices. Leaders state practices such as mentoring, career development programs, and recruiting initiatives do not focus on race or underrepresented minorities. These same practices were identified during previous research as recommended practices for agencies to adopt to address minority representation (Table 1) (Lanier, Young, 2015). Because these programs were not designed to address underrepresentation of minorities, they were not included in this research. Programs that were designed specifically to address minority underrepresentation, 44% of leaders stated they have adopted and implemented programs that do not focus on race. Although these findings are based on leaders' experience and perspective in this study within the context of their agency and departments, this is a shift from Kellough and Naff's research in 1999, when 95% of the federal agencies reported

their diversity programs addressed race (Kellough, Naff, 2004). Because the EEO program was created to focus on racial disparities, amongst other things, could there be another shift taking place within EEO programs? Are they still relevant? The comments below are from leaders when asked about programs specifically designed to address minority underrepresentation:

EEO/Div Leaders:

“There are many practices, but the focus is not based on race. Practice is reactive if there is an issue based on race.”

The leader expressed concern over the multiple practices but lack outcomes. “There is a greater emphasis in watered down diversity initiatives that do not focus on race.” The leader was disappointed with practices and lack of focus on race because “there are still issues with underrepresentation of minorities.”

Leader credited the integration of practices to their EEO/Diversity office “but these practices are not a priority”. “Priorities are other non EEO/Diversity practices that do not address race”.

Middle Managers:

“Some practices focus on race, other practices do not.”

“Existing practices did not focus on race.”

“There are no practices or programs designed to address minority representation and haven’t been for over 15 years.”

Senior Executives:

“There are some practices and programs designed to address minority representation while other practices do not focus on race (including programs for SES candidates).”

“I don’t make it a practice to focus on race.”

When informants were asked about the option to not focus on race, some were concerned while others viewed it as necessary and that underrepresentation would take care of itself, eventually. The informants all agreed, however, there are issues with minority underrepresentation at the senior level (including GS 14, 15, and SES) within their agencies.

Table 4 Shifts in Leaders' Responsibilities Influence Integration of Practices  
 (Number of practices influenced by 3 levels of leaders)  
 (expanded version of table 4 see Appendix I)

<b>Shifts in Leaders' Responsibilities Influence Integration of Practices (# is interview question)</b>						
		#9-Introd Practice	#10-Implem Practice	#11-Maintain Practice	#12-Most Influence over Practice	<b>Comments</b> EEO/Div offices are not included as a practice in Table 4
<b>EEO/DIV LEVEL LEADERS</b>						
<b>Totals</b>	18 Practices Identified	56% (10 of 18) of practices introduced by EEO/Div leaders (incl shared resp).	61% (11 of 18) of practices implemented by EEO/Div leaders (incl shared resp).	83% (15 of 18) of practices maintained by EEO/Div leaders (incl shared resp).	56% (10 of 18) of practices influenced most by EEO/Div leaders (incl shared resp).	Of the practices identified, some responsibilities (e.g. introduced, implemented, etc.) were shared by one or more leaders.
<b>MIDDLE MANAGER LEVEL LEADERS</b>						
<b>Totals</b>	13 Practices Identified	46% (6 of 13) of practices introduced by Middle leader (incl shared resp).	46% (6 of 13) of practices implemented by Middle leader (incl shared resp).	46% (6 of 13) of practices maintained by Middle leader (incl shared resp).	62% (8 of 13) of practices influenced most by Middle leader (incl shared resp).	Of the practices identified, some responsibilities (e.g. introduced, implemented, etc.) were shared by one or more leaders.
<b>SENIOR LEVEL LEADERS</b>						
<b>Totals</b>	2 Practices Identified	0% of practices introduced by Senior leaders (incl shared resp)	0% of practices implemented by Senior leaders (incl shared resp)	0% of practices maintained by Senior leaders (incl shared resp)	0% of practices influenced most by Senior leader (incl shared resp).	Of the practices identified, some responsibilities (e.g. introduced, implemented, etc.) were shared by one or more leaders.

Table 1 Practices, Programs, and Initiatives Identified from 1994 – 2011

<b>Practices, Programs, and Initiatives Identified from 1994 – 2011</b>			
	<b>Practices</b>	<b>Prevalence (%)</b> 128 References made	<b>Use in Research</b>
1	Workforce and Succession Planning Strategies	16%	
2	Mentoring/development	12%	
3	Targeted Recruitment & Hiring Efforts	11%	
4	Plans (e.g. strategic plans)	11%	
5	Increased Oversight/Advisement	9%	
6	Performance Management Measurement/Accountability System (targeted to managers for working to promote a diverse and inclusive workforce)	9%	
7	Monitor Applicant/Promotion Hiring Ratio	8%	
8	Legislation/Executive Order	7%	
9	Organizational time/resources on problem	4%	
10	Task Force/Committee	3%	
11	Leadership commitment	3%	
12	Social gatherings	2%	
13	Strengthen HR/employment practices in general (no specific reference made to recruitment, selection, development, etc.	1.5%	
14	Onboarding	1.5%	
15	Conduct new study (e.g., survey) about the problem	1%	
16	D&I office	1%	

(Lanier, Young, 2015)

**Chapter Four****Part 2, Section 2 - Leaders, Practices, and Institutional Pressures (Table 5)**

Question 2: How did shifts in institutional pressures influence the integration of practices?

**Findings 3:** Practices continue to be adopted and integrated due to legal mandates. Of the 47 practices identified by leaders in this research, 55% existed due to coercive pressures, 4% due to both coercive and mimetic pressures, 11% due to mimetic pressures, and 30% of the practices (EEO and diversity offices) due to combined coercive and normative pressures.

**Introduction: Shifts in Institutional Pressures Influence Integration of Practices**

According to findings, there was no shift in institutional pressure on practices identified in this research. Of the institutional pressures identified in this research (coercive, mimetic, and normative) coercive or legal mandates was the reason leaders stated they adopted and integrated equity and diversity practices. It appears without this pressure, leaders are less likely to address minority representation. Mechanisms did not shift from less coercive and more mimetic or normative as expected. Although normative pressures was attributed to the creation and integration of EEO/Diversity offices, it was coercive or a combination of normative and coercive since leaders stated the offices existed because of legal mandates.

This section combines data from the Four-Part Typology and responses from interview questions # 5, 6, 7, 8, and 14 for an analysis of how and to what degree institutional pressures influenced the integration of practices across time. First to assess the degree institutional pressures influence the integration of practices, researcher provides informants' responses to interview questions # 5, 6, 7, 8, and 14 organized by the level of leader. Next, based on informants' responses, researcher discusses the

number of practices identified, and how institutional pressures influence practices.

Lastly, researcher provides a summary of findings from this section.

To analyze to what degree institutional pressures influenced the integration of practices, interview questions included:

#8 - Is there an EEO/Div Office?

#5 - How many practices addressed underrepresentation?

#16 - How long were practices in existence?

#6/7 - What pressures influenced the integration of practices?

### **Degree Institutional Pressures Influence Integration of Practices**

Researcher provides informants' responses to interview questions # 5, 6, 7, 8, and 14 arranged according to the level of leader (EEO/diversity, middle, and senior level leader). Leaders identify the practices, to include EEO/Diversity offices, identify which institutional pressure/s influenced the offices and practices, and the length offices and practices existed.

### **Practices Identified, Practices and Institutional Pressures, and Summary**

In this next section, researcher discusses the practices identified by informants, how institutional pressures influenced practices, and provides a summary of findings.

#### **Practices Identified**

The three levels of leaders identified 33 practices influenced by institutional pressures as being adopted by their agency (see Table 5). Because the EEO and Diversity office is considered a practice influenced by normative pressures, there were a total of 47 practices. Of the 47 practices, EEO/Diversity managers identified 53% of the practices; middle managers identified 40%, and SES identified 6%.

It is not surprising that EEO/Diversity managers identified the majority of practices but it was surprising that SES identified few practices adopted by their agency. Also, an impressive finding was the middle managers' awareness of existing practices and whether it was legally mandated or influenced by other mechanisms. Additionally, the gap between the number of practices identified by the EEO/diversity manager and the middle manager was not as significant as expected (13%). This is a shift across time, in that little research included middle managers has having a role in EEO and diversity initiatives. Yet research emphasizes the critical role senior leaders play in the adoption, implementation, and integration of EEO and diversity initiatives (Kelly, Dobbins, 1998) (Kellough, Naff, 2004) (Kalev, Dobbin, Kelly, 2006. This dates back to the 1980s when Reagan shifted responsibility of EEO programs to senior leaders in agencies (DuRivage, 1985). This shift across time shows a decreased perception by senior leaders and EEO and diversity leaders of their role in leading EEO/Diversity initiatives while the role and responsibility for middle managers increased. Few senior leaders were interviewed; additional research with an increased number of SES may yield different results.

### **Practices and Institutional Pressures**

Leaders adopted and integrated practices because of legal mandates. Leaders in this research without legal mandates did not integrate practices. Mechanisms did not shift from less coercive and more mimetic or normative as expected. Even the creation and integration of EEO/Diversity offices were attributed to legal mandates.

Of the 47 practices, 55% were influenced by coercive pressures, 4% were influenced by both coercive and mimetic, 11% were influenced by mimetic and 30% of

the practices (EEO and diversity offices) were influenced by normative (see Figure 12). The existence of EEO and diversity offices were also influenced by coercive or combined as both normative and coercive, as informants stated, the office existed because of legal mandates.

Of the 55% of practices influenced by coercive, 54% were practices identified by EEO/Diversity managers, 38% by middle managers, and 8% by SES. EEO/Diversity managers identified the practices (4%) influenced by both coercive and mimetic. Of the 11% of practices influenced by mimetic, 60% were identified by middle managers, 40% EEO/Diversity managers. Of the 30% of practices influenced by normative, EEO/Diversity managers identified 50% of the practices, 43% by middle managers, and 7% by SES.

#### EEO/Diversity Offices

To provide clarity on the existence of EEO/Diversity offices, 78% of the leaders had an office in their agency, 11% of the leaders had a representative or the EEO/Diversity function was under Human Resources, and 11% did not have an EEO/Diversity office. Of the EEO/Diversity managers, 100% of their agencies had an office, 75% of the middle managers' agencies had an office while 12.5% had a representative and 12.5% did not have an office. Of the SES, 33% of agencies had an office, 33% was a Human Resource function and 33% did not have an office.

#### Coercive Pressures

Most practices are still influenced by coercive pressures. This generates a question: If leaders are not required by law to adopt these practices, would they adopt

them? There are leaders included in this research whose agencies are not required by law to adopt EEO or diversity practices. These leaders were unable to identify any practices that were adopted and integrated to address minority underrepresentation. On the other hand, there was one leader, required by legal mandate to adopt EEO and diversity practices, but had not. This leader represents a small percentage of those leaders under mandate who have adopted practices, suggesting coercive pressure impacts the adoption of practices.

### Mimetic Pressures

With the increase in diversity programs taking center stage over EEO programs, and since 2011 the establishment of EO 13583, it is surprising that very few (11%) practices are influenced by mimetic pressures (EO, 2011) (Kim, Kalev, Dobbin, 2012). Prior to EO 13583, many agencies shifted their focus and resources to diversity programs (Kim, Kalev, Dobbin, 2012). The emphasis was for leaders to mimic private sector and other public organizations' success in diversity programs (Weber, Davis, Lounsbury, 2009). This shift across time to copy best practices was not mentioned in the interview responses when identifying practices. Perhaps diversity programs did not rise to the prominence expected or perhaps EEO programs are still being repackaged as diversity programs (Kellough, Naff, 2004). Since leaders reported many programs did not focus on underrepresented groups, perhaps diversity programs rose to the prominence expected by shifting the focus across time away from race. Leaders identified programs established as a part of diversity initiatives, but many of these programs were designed for all employees and if underrepresented groups benefited, that was considered a plus.

Although findings in this research indicate there were no shifts in institutional pressures on practices identified, there was a notable shift of normative pressure on practices initially created to address underrepresented groups but shifted to address all groups. Specifically, there are EEO/diversity managers who have the responsibility of maintaining practices that do not address representation. This also includes practices that were once EEO practices, now transformed into either diversity or agency practices. This was not the focus of this research, but additional research on how leaders transformed EEO practices for underrepresented groups to agency practices for all employees may add further understanding to shifts in institutional pressures on practices.

#### Normative Pressures

The practice influenced by normative pressures was the existence of an EEO/Diversity office. Findings show across time, offices that were created and established existed over 10 years. The percentage of leaders identified as having an EEO/Diversity office was significant (78%), while 22% leaders reported no office. Of those leaders without an office, 11% are small sub agencies whose EEO/Diversity offices are located at the agency level. The other leaders (11%), who reported no office, are not under legal mandate to establish an office. The majority of leaders have an office, specifically, 100% of the EEO/Diversity managers and 75% of middle managers.

#### **Summary - Leaders, Practices, and Institutional Pressures**

Based on responses from leaders, the responsibility of integrating practices has shifted. Without a baseline from previous research, it is impossible to determine how

much has shifted across time. Previous studies have not included middle managers as a solution to integrating equity and diversity practices, but rather one that impedes progress (Kelly, Dobbin, 1998). Findings from this research suggest middle managers are more involved in integrating programs than the researcher expected. The EEO/Diversity manager integrated many programs but the difference between the middle manager and EEO/Diversity managers' involvement in equity and diversity practices are narrow. The SES and EEO/Diversity managers were less involved than the researcher expected and perceived themselves as having less responsibility for integrating of practices. These shifts across time should have an impact on integration of practices but according to analysis using the four-part typology, more leaders (12 out of 18) are careful not to disrupt their agency or rock the boat. Most used the Team Player approach of maintaining the status quo even if they did not agree with current situation. Other approaches used were Technician (one), Professional (four) and one Advocate out of 18 leaders was surprisingly a middle manager and not an EEO/Diversity manager. Both middle managers and EEO/Diversity managers used the Professional approach. Although the numbers are low, this approach when used, may significantly impact the integration of practices while addressing underrepresentation. Other factors that may impact the integration of practices are legal mandates and requirements.

Across time, leaders reported practices are adopted, implemented, maintained, and integrated due to legal mandates. This is not a shift across time since previous research suggests adoption of practices to address minority representation is due to legal mandates. Of the practices identified, 55% were influenced by coercive pressures and 30% were influenced by both coercive and normative pressures. Few leaders identified

mimetic or copying practices from other organizations as a reason for adopting, implementing, maintaining, or integrating practices. An alarming and unexpected shift was leaders' lack of focus on race. Practices listed on table 1 that were previously adopted or recommended for adoption to agencies to address minority representation, leaders reported these programs did not focus on race or representation (Lanier, Young, 2015). Previous study in Appendix A, conducted by researcher, analyzed 14 documents dated from 1994 through 2011 to identify programs and practices recommended for adoption and integration specifically to address minority representation resulted in 16 practices listed on table 1 (Lanier, Young, 2015). Leaders stated practices such as mentoring, career development, and succession planning did not consider representation. This is a shift from Kellough and Naff's research in 1999 when 95% of agencies' diversity programs addressed race (Kellough, Naff, 2004). Based on interviews in this research 44% of leaders have adopted practices but do not focus on race. Additional research may reveal which institutional pressures now influence practices that were once adopted to address minority representation but now adopted without consideration for race.

In part three and four, further examination identify to what degree practices are integrated using interview data, reports, and surveys and how minority representation at the senior level influence integration of practices.

Figure 12 Practices Influenced by Coercive-Mimetic-Normative Pressures

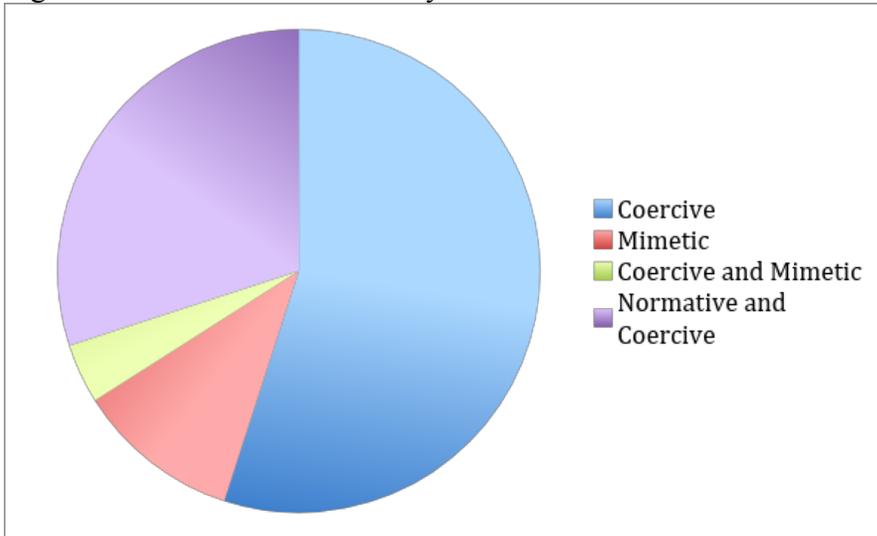


Table 5 Institutional Pressures Influence Integration of Practices  
(expanded version of table 5 see Appendix J)

<b>Institutional Pressures Influence Integration of Practices (# is interview question)</b>					
<b>#5-Programs and Dedicated EEO/Div Ofc</b>		<b>#6-C-Coercive #7-M-Mimetic #8-N-Normative</b>		<b>#14-Years Practice Exist 5+ years-integrated</b>	
<b>EEO/DIV LEVEL LEADERS</b>					
<b>Sub total</b>	<b>18 Practices</b> +7 EEO/Div Ofcs = 25 Practices	Coercive	14 Practices	10+ yrs	22 Practices
		Coercive/Mimetic	2 Practices	0-4 yrs	3 Practices
		Mimetic	2 Practices		
		Normative	7 Practices		
<b>MIDDLE MANAGER LEVEL LEADERS</b>					
<b>Sub total</b>	<b>13 Practices</b> +6 EEO/Div Ofcs = 19 Practices	Coercive	10 Practices	10+ yrs	17 Practices
		Mimetic	3 Practices	1 yr	2 Practices
		Normative	6 Practices		
<b>SENIOR LEVEL LEADERS</b>					
<b>Sub total</b>	<b>2 Practices</b> +1EEO/Div Ofc = 3 Practices	Coercive	2 Practices	10+ yrs	2 Practices
		Normative	1 Practice	6-9 yrs	1 Practice
<b>TOTALS</b>					
	33 Practices	Coercive	26	10+ yrs	41 Practices
	14 EEO Offices	Coercive/Mimetic	2	6-9 yrs	1 Practice
	<b>47 Practices total</b>	Mimetic	5	0-4 yrs	5 Practices
		Normative	14		

## **Chapter 4**

### **Findings Pt 3: Report (MD 715) and Survey (FEVS) Data**

Part three is a discussion of findings from three sections (sections 1 through 3). All sections uniquely identify the degree practices are integrated by three levels of leaders and their agencies. Section one explains findings from the MD 715 report data, section two explains findings from the FEVS data, and section three combines the findings from interviews, reports, and surveys.

## **Chapter Four**

### **Part 3, Section 1 - Management Directive 715 Report (Tables 6 and 7/Appendices K and L)**

Question 3: To what degree were practices integrated by the three levels of leaders?

**Findings 4:** Eleven leaders' agency reports were analyzed. Overall, data from reports indicate 11 leaders' agencies integrated practices to varying degrees. Four out of 11 reports provided data for one year and could not be analyzed across time but data reported most practices were integrated.

### **Introduction: Degree Practices Integrated – MD 715 Report**

The MD 715 reports agencies' progress towards developing a model EEO program. The report provides indicators of whether the leaders' agencies integrated programs into their strategic mission and to what degree. This research analyzes Part G, Essential Elements or Sections A, B, C, D, and E of the MD 715 report (see figure 1). Section A requires senior level leaders incorporate EEO principles within the agency structure, ensure EEO becomes an everyday practice at all levels, and issue a written policy stating their commitment to EEO. Sections B requires agencies integrate programs into their mission. In Section C, middle level leaders are required to implement and maintain EEO programs, assess the effectiveness of programs, and they are evaluated

on the effectiveness of their EEO programs. Section D requires agencies conduct a self-assessment on the demographics of their workforce to monitor progress of EEO programs. Finally, Section E requires agency head ensure systems are in place to measure efficiency of programs and also have a fair dispute resolution process (MD 715 Annual Report) (EEOC website, 2018). When analyzing data from this report for each leader's agency, Sections B and E provided indicators of whether or not programs were integrated (see Table 6). Researcher analyzed sections A, C, and D to assess the degree to which practices were integrated (see Table 7). MD 715 reports were not available for every leader's agency. See figure 1 for a detailed explanation of the MD 715 reporting requirements for the sections used in this research. First to assess if practices are integrated across time and the degree they are integrated, researcher provides data from the MD 715 report organized by the level of leader. Next, based on report data, researcher provides a summary of findings from this section.

### **Analysis of Leaders' Agencies – Integration of Programs/Practices (MD 715 Reports)**

Were practices integrated by leaders' agencies?

Sections B and E responses were indicators of whether practices were integrated (Table 6/Appendix K)

Indicators that practices were integrated are:

- 1 – EEO Director has access to agency head
- 2 – EEO Director coordinates with Human Resources
- 3 – EEO office maintains a competent staff
- 4 – Managers receive training
- 5 – Managers and employees implement programs
- 6 – Employees are informed of EEO programs
- 7 – Agency head ensure effective systems to measure efficacy of programs and fair dispute resolution process

To what degree were practices integrated by leaders' agencies?

Using Sections A, C, and D to analyze to what degree practices were integrated by leaders' agencies (Table 7/Appendix L):

- 1 – Commitment from agency leadership

- 2 – Accountability of middle level leaders
- 3 – Assessment to monitor progress of programs

## **SUMMARY**

The reports spanned from one to 13 years. The integration of practices varied. Of the 18 leaders, researcher analyzed 11 leaders' agency reports. The summary of leaders' agency data identifies inconsistencies in data reported across time and one year data reports.

### Inconsistencies in Data

Ophelia and Camille's agency report inconsistent data that indicate some practices are integrated across time. Data indicate there is commitment from agency leadership, accountability of middle level leaders' implementation of programs, and assessment to monitor progress of programs. Yet data identify deficiencies to include structural misalignment of EEO Director with agency head and lack of EEO officials during workforce changes. The presence of EEO officials during deliberations for critical workforce changes and EEO Director direct access to agency head were never integrated into agency practices. Data indicate agency head evaluated effectiveness of programs while the report state there is inadequate EEO staffing to analyze the effectiveness of programs. Overall, some but not all programs are integrated.

Ingrid and Willa's agency data indicate practices are integrated across time. In the early stages of reporting, processes are not implemented. All programs except one, data collection and analysis system, was integrated consistently during the last three years reported. Overall, most but not all programs are integrated.

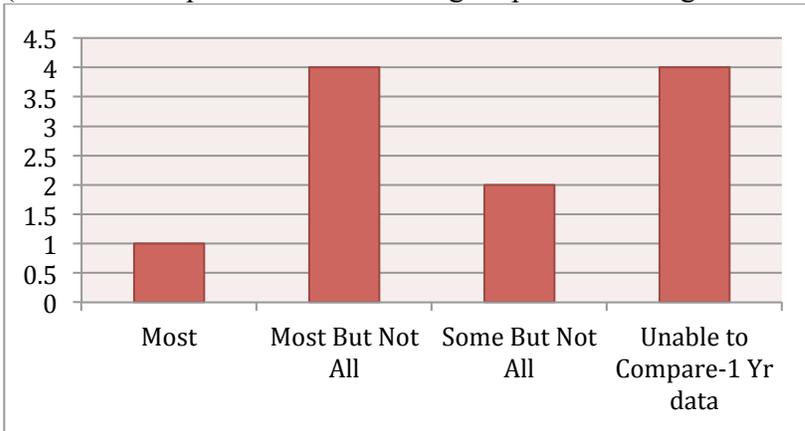
Dean and Alena's agency data is difficult to summarize whether programs and practices are integrated. It is a combination of both. Most programs are integrated across time. There were two practices that appeared integrated but no longer implemented during the last report. Also, one practice was never integrated, a process to assess the impact of systemic barriers on representation. Overall, most but not all programs are integrated.

### One Year Data

Lenny, Agnes, Nate, and Alicia's agency reported data for one year and indicate practices are implemented. Jose agency data indicate most, but not all, practices are integrated across time. It was difficult to analyze if practices are integrated because more data across time is needed to assess consistent use of practices.

In summary, of the 11 MD 715 reports, four reports covered one year. To analyze if practices are integrated across time, researcher needs more data to assess agency's consistent use of practices. Overall, data from reports indicate leaders' agencies integrated practices to some degree across time. Most data results are a combination whereby agencies integrate some or most, but not all practices (see figure 13). This is consistent with research in that practices may be in different stages and not fully integrated (Junaid, Leung, Buono, 2015). The next section analyzed Federal Employee Viewpoint Survey data based on employee's perception of agencies' integration of practices.

Figure 13 MD 715 Data – Degree Practices Integrated  
(Number of reports on Y axis – Degree practices integrated on X axis)



See Tables 6 and 7 (Appendices K and L) for MD 715 Report Data

**Chapter Four****Part 3, Section 2 - Federal Employee Viewpoint Survey (Table 8/Appendix M)**

Question 3: To what degree are practices integrated by the three levels of leaders?

**Findings 5:** Of the surveys for 15 leaders' agencies, employees from 13 leaders' agencies state practices are integrated within their agencies across time (2008 through 2017). Specifically, most employees perceive policies and programs promote diversity in the workplace, Prohibited Personnel Practices (Appendix G) are not tolerated, their supervisors are committed to a workforce representative of all segments of society, and work well with employees of different backgrounds resulting in index scores above median. Because survey data for one leader's (Alex) agency included 2017 only, results could not be analyzed across time. However, index scores are above median for Alex's agency. Employees from one leader's agency (Alicia) state practices were not integrated within their agencies in 2015 and 2016 but integrated in 2017. Survey data was not available for 3 leaders' agencies due to no federal requirement or non-participation.

**Introduction: Degree Practices Integrated – FEVS**

The Federal Employee Viewpoint Survey (FEVS) measures employees' perceptions of their agencies. Employees share their perceptions about their leadership, supervisor, and agency. OPM and agency managers use these indicators in developing policy and planning actions to improve agency performance and evaluate individual agencies' progress towards long-term goals (OPM website). Using Partnership for Public Service's Best Places to Work in Support of Diversity data, agency scores measure the extent employees believe that actions and policies of leadership and management promote and respect diversity (Best Places to Work.org, 2017). In 2015, Partnership for Public Service added index scores for the category of Best Places to Work in Support of Diversity. Scores were not available for agencies that did not participate in the survey. Agency scores were placed in one out of four quartile (lower, below median, above median, and upper). Since an above median score was considered acceptable in this

report, scores above median or higher are used as an indicator that practices are integrated.

Researchers use indicators similar to MD 715 reports to assess if practices are integrated and the degree practices are integrated (see Table 8). Questions 34 and 38 indicate practices are integrated while questions 45 and 55 indicate the degree practices are integrated based on senior and middle level leader involvement in integrating practices. Survey data for 2008 through 2017 were available for some but not all agencies. This data provided index scores for each question. When data was not available from 2008 through 2017, researchers used Best Places to Work in Support of Diversity data. This data compiled annual scores for 2015, 2016, and 2017, resulting in a combined index score for questions 34, 38, 45, and 55. Responses are: strongly agree, agree, disagree, strongly disagree, and neither agree nor disagree. When compiling responses, this research combines strongly agree and agree into one category, strongly disagree and disagree into another category, and neither agree nor disagree into the final response category. This section provides a summary that includes survey participation, employees' perception, and how survey data differs from interview data.

The Best Places to Work in Support of Diversity index score is derived from the following questions:

- 34 - Policies and programs promote diversity in the workplace
- 38 - Prohibited Personnel Practices are not tolerated
- 45 - My supervisor is committed to a workforce representative of all segments of society
- 55 - Supervisors work well with employees of different backgrounds

**Leaders' and their Agencies – Integration of Programs/Practices (FEV Surveys)**  
(Based on employee's perception)

Were practices integrated by leaders' agencies?

Responses to questions 34 and 38 were used as indicators of whether practices are integrated

34 - Policies and programs promote diversity in the workplace

38 - Prohibited Personnel Practices are not tolerated

To what degree are practices integrated by leaders' agencies?

Responses to questions 45 and 55 were used to analyze to what degree practices are integrated by leaders' agencies:

45 - My supervisor is committed to a workforce representative of all segments of society

55 - Supervisors work well with employees of different backgrounds

## **SUMMARY**

### Survey Participation

Of the eighteen leaders, 15 leaders' agencies participated in the survey while three agencies did not have survey data. Nadine's agency may not have participated and Sergio and Mitch's agencies were not required to participate in the survey. Of the 15 surveys, six surveys spanned across nine years (2008 through 2017), eight spanned across three years (2015 through 2017), and one included one year (2017).

### Survey Index Scores

The six surveys from 2015 through 2017 revealed fluctuations in index scores. Although index scores remained above median, scores either declined or fluctuated from 2008 through 2016. All scores increased in 2017. Of the eight survey reports from 2015 through 2017, seven maintained index scores above median. Alicia's score decreased from 2015 to 2016 to a below median score but increased in 2017, resulting in an above median score. The Best Places to Work in Support of Diversity index scores (2015 through 2017) increased every year for all leaders' agencies except Alicia. Alex's agency

only participated in 2017 and index scores were above median. Overall, scores were above median as seen in table 8, which provides index score levels for each leader category.

### Employee's Perceptions

Based on the index scores, most employees perceive policies and programs promoted diversity in the workplace, Prohibited Personnel Practices are not tolerated, their supervisors are committed to a workforce representative of all segments of society, and work well with employees of different backgrounds. There are no significant differences between employee's perceptions of their agency integrating practices or leadership involvement, except for Alicia's agency. Alicia's index score was below median in 2015 and 2016, barely reaching above median in 2017. Because the scores combine all questions, researcher was unable to identify what question or questions resulted in an index score below median. The remaining agencies' index scores were above median across time. A unique finding was index scores for all agencies increased in 2017, indicating employees' perception or their agency support for diversity increased. Across time, neutral responses seemed high; 20% - 30% employees' responses were neutral of neither agreed or disagreed. However, as the responses of "agree" increased, "disagree" and "neutral" responses decreased.

### Survey Data Differs from Interview Data

Employees' view of the degree their leaders integrate practices differs from interview data. The majority of employee surveys view their leaders as integrating

practices. Practices are integrated based on the overall score being above median (50 – 75%). There may not be stark differences between the interview and survey data when considering employees that disagree or neither agree nor disagree. The scores of agree, on average, range anywhere from 60 to 70% which leaves 30 to 40% that do not agree or neither agree nor disagree that leaders integrate practices. The number of employees that neither agree nor disagree may fit within several categories. Some categories may include: employees unaware if practices are integrated (e.g. new employees), employees that would rather not provide an opinion, or employees who disagree but prefer not to provide a negative opinion. Why employees provided their responses is not available to researcher. When adding the category of employees that disagree, or neither agree nor disagree, 30 to 40% may reflect the degree practices are integrated is gradual. Because the survey does not have a category identifying gradual integration of practices, only integrated or not integrated, the 30 to 40% may account for some degree of integration. The next section combines interview, report, and survey data, identifying consistencies and inconsistencies between the data.

Table 8 FEVS Degree Practices Are Integrated  
(expanded version of table 8 see Appendix M)

**FEVS 2008-2017 - Degree practices are integrated based on agency surveys**

2015-2017 Best Places to Work in Support of Diversity 1-Lower Quartile (0-25%) 2-Below Median (25-50%) 3-Above Median (50-75%) 4-Uppoer Quartile (75-100%)		Agencies with a score of Above Median and higher, practices are considered integrated.		
	#34-Policies and programs promote diversity in the workplace. Note: No FEVS in 2009	#38-Prohibited Personnel Practices are not tolerated. Note: No FEVS in 2009	#45-My supervisor is committed to a workforce representative of all segments of society. Note: No FEVS in 2009	#55-Supervisors work well with employees of different backgrounds. Note: No FEVS in 2009
<b>EEO/DIV LEVEL LEADERS</b>				
EEO/diversity leaders with reports	Above Median	Above Median	Above Median	Above Median
<b>MIDDLE MANAGER LEVEL LEADERS</b>				
Middle manager leaders with reports	Above Median	Above Median	Above Median	Above Median
<b>SENIOR LEVEL LEADERS</b>				
Senior leaders with reports (Alicia)	Below Median (2015-2016)	Below Median (2015-2016)	Below Median (2015-2016)	Below Median (2015-2016)
	Above Median (2017)	Above Median (2017)	Above Median (2017)	Above Median (2017)

**Chapter Four****Part 3, Section 3 – Combined Data: Interviews, Reports, and Surveys (Tables 9, 9a, and 9b)**

Question 3: To what degree were practices integrated by the three levels of leaders?

**Findings 6:** Of 18 leaders, 11 had MD 715 and FEVS data, four did not have MD 715 data and three did not have either MD 715 or FEVS data. When comparing data, researcher used interview, MD 715, and FEVS data to assess the degree practices were integrated. Two out of 11 leaders' data were consistent and reflected varying degrees of integration of practices. Nine out of 11 leaders' data were inconsistent and reflected varying degrees of integration of practices. Of the 18 leaders, four did not have MD 715 data but had FEVS data, for a comparison of interview and FEVS data. Two of the four leaders' data consistently reported practices were gradually integrated, one leader's data inconsistently reported practices were gradually integrated, and one leader did not have practices.

**Introduction: Combined Data – Interviews, MD 715, and FEVS**

Researcher compared interview, MD 715, and FEVS data to compile an overall analysis of the degree practices are integrated (see Table 9). Of the 18 leaders, 11 had MD 715 reports, 15 had FEVS, and three leaders (Sergio, Nadine, and Mitch) did not have MD 715 or FEVS data to compare with interview data. Combining individual analysis of interviews, MD 715 data, and FEVS data allows researcher to further identify trends, consistencies, inconsistencies, and synchronize findings. Although FEVS data were included in analyzing data, comparison of interview and MD 715 data were primary in assessing the degree practices are integrated. Researcher used this approach due to the similarity of practices identified by leaders and those identified in MD 715 reports. Additionally, the MD 715 report provides a framework for all leaders, identifying the degree to which practices should be adopted, implemented, and integrated to address minority representation. Comparison of interview and FEVS data are also critical.

Although survey data does not specifically identify programs, survey data indicates agency practices are integrated as perceived by employees. Researcher will identify overall consistencies and inconsistencies amongst the leaders with interview, report, and survey data. Researcher then identifies consistencies and inconsistencies between interview and MD 715 data. Lastly, researcher identifies consistencies and inconsistencies between interview and FEVS data and provides a summary of this section.

#### Comparison for Consistencies and Inconsistencies

When comparing interview, MD 715, and FEVS data, data are consistent for two out of 11 leaders and inconsistent for nine out of 11 leaders (see table 9a). Meaning, the interview data does or does not match the MD 715 and/or FEVS data. Ophelia and Agnes's data are consistent when comparing interview, MD 715, and FEVS data. Ingrid, Camille, Dean, Lenny, Jose, Willa, Nate, Alena, and Alicia's interview data identify one or two practices as integrated. This is inconsistent with MD 715 and FEVS data that indicates some or most practices as integrated. This reflects a variation of the degree to which practices are integrated. The MD 715 report identifies a significant number of practices to include barrier analysis, target recruitment programs, Special Emphasis/Observances programs, training, climate assessments, succession planning programs, etc. When leaders only identify one or two practices and the MD 715/FEVS indicates most practices are integrated, researcher considers this inconsistent data. Based on the significant number of practices identified in the MD 715 reports, researcher assess practices are integrated to varying degrees, as leaders identify various numbers of

practices integrated. Researcher also identifies consistencies and inconsistencies between interview and FEVS data (see table 9b). Of the 18 leaders, 15 had FEVS data. Data are consistent for four out of 18 leaders and inconsistent for 11 leaders. Some examples of consistencies between interview and MD 715 and/or FEVS data:

Ophelia interview data indicates four practices are integrated, the MD 715 reported some but not all practices were integrated from 2012 through 2017, while the FEVS indicated practices were integrated 2015, 2016, and 2017.

Agnes interview data indicates three practices are integrated, the MD 715 reported practices were integrated in 2014, while the FEVS indicated practices were integrated 2015, 2016, and 2017. Both examples are considered consistent because the leader identified three to four practices as integrated and the MD 715 and FEVS reflected similar results.

Some examples of inconsistencies include:

Ingrid identified one practice but the MD 715 report indicated most, but not all practices from 2007 through 2017 were integrated. Ingrid stated there were many activities but no impact from these programs in over 10 years. Based on that statement, perhaps the practices identified in the MD 715 are symbolic.

Dean identified one practice, training, as integrated but the MD 715 report indicated most, but not all practices from 2011 through 2016 were integrated.

Jose identified one practice, training, as integrated but the MD 715 report indicated most practices from 2006, 2007, 2009, and 2011 were integrated. Both Dean and Jose stated their practices did not focus on minority representation.

These inconsistencies may be an indicator that practices identified as integrated may exist symbolically. Next, researcher discusses consistencies and inconsistencies between data.

#### Consistencies and Inconsistencies Between Interview and MD 715 Data (Table 9a)

When comparing analyses of interviews and reports, there are inconsistencies between the interview and MD 715 data. Table 9a reflects inconsistencies based on interview data provided by informants and MD 715 reports. When informants identify

two or fewer practices as integrated (Ingrid, Camille, Dean, Lenny, Jose, Willa, Nate, Alena, and Alicia), researcher did not consider practices as integrated without additional data (MD 715 and/or FEVS) confirming or disconfirming the degree practices are integrated. Leaders identified practices their agencies adopted, implemented, and integrated. Likewise, the MD 715 report identified practices agencies adopted, implemented, and integrated. The outcomes are not always consistent for leaders with MD 715 data. Leaders identify multiple practices as being integrated while reports did not support the leader's claim. Conversely, data from reports indicate practices are fully integrated while leaders identify only one or two practices as being fully integrated. The term inconsistent is used when leaders reported practices are or are not integrated and MD 715 data indicates differently. There may be numerous reasons for these inconsistencies and some reasons are outside of the scope of this research. Reasons are explored here and in the next chapter.

Reasons for some inconsistencies cannot be confirmed without conducting additional interviews with a more narrow scope, focusing specifically on practices identified in the MD 715 report. This would include interviews requesting the status of practices as listed on the MD 715. The scope of this research was broad with the intent of exploring all programs and practices not only related to MD 715 EEO mandated practices but also diversity practices. Most practices identified as integrated by leaders, with or without MD 715 reports, are located in Section B of the MD 715. These practices were EEO/Diversity office, training, Special Emphasis, and Special Observances. One possible reason for inconsistencies may be based on the leader interviewed. The middle level leader may not be aware of all existing EEO and diversity practices whereas the

EEO/Diversity leader should be fully aware of practices listed on the MD 715 because they are responsible for that report. There are also obvious practices middle level leaders should be aware of since they may have the oversight or be involved in implementation and integration these practices (e.g. training, target recruiting, succession planning, etc.). Since the EEO/diversity leader should be fully aware of practices integrated, inconsistencies based on what EEO/diversity leaders reported and MD 715 data may be attributed to practices that are symbolically integrated.

Table 9a Consistencies and Inconsistencies of Combined Interview and MD 715 Report Data - Degree Practices Integrated  
(expanded version of table 9a see Appendix N)

<b>Combined Interview and MD 715 Report Data - Consistencies and Inconsistencies</b>			
<b>Case</b>	<b>Two or less practices not considered integrated (Interview Data)</b>	<b>MD 715 Report</b>	
<b>EEO/DIV LEVEL LEADERS</b>			
<b>Ophelia</b>			
<i>Consistent</i>	4 Practices Integrated	<b>Some but not all programs integrated</b>	
<b>Ingrid</b>			
<i>Inconsistent</i>	1 Practice Integrated	<b>Most but not all programs integrated</b>	
<b>Camille</b>			
<i>Inconsistent</i>	2 Practices Integrated	<b>Some but not all programs integrated</b>	
<b>MIDDLE MANAGER LEVEL LEADERS</b>			
<b>Dean</b>			
<i>Inconsistent</i>	1 Practice Integrated	<b>Most but not all programs integrated</b>	
<b>Lenny</b>			
<i>Inconsistent</i>	2 Practices Integrated	<b>Some but not all programs integrated</b>	One year data
<b>Jose</b>			
<i>Inconsistent</i>	1 Practice Integrated	<b>Most programs integrated</b>	
<b>Agnes</b>			
<i>Consistent</i>	3 Practices Integrated	<b>Some but not all programs integrated</b>	One year data

<b>Willa</b>			
Inconsistent	1 Practice Integrated	<b>Most but not all programs integrated</b>	
<b>Nate</b>			
Inconsistent	1 Practice Integrated	<b>Some but not all programs integrated</b>	One year data
<b>Alena</b>			
Inconsistent	2 Practices Integrated	<b>Most but not all programs integrated</b>	
<b>SENIOR LEVEL LEADERS</b>			
<b>Alicia</b>			
Inconsistent	1 Practice Integrated	<b>Some but not all programs integrated</b>	One year data

#### Consistencies and Inconsistencies Between Interview and FEVS Data (Table 9b)

When comparing analyses of interviews and surveys, there are inconsistencies between the interview and FEVS data. Employees' view of the degree their leaders integrate practices differs from interview data. Table 9b reflects the inconsistencies based on interview data provided by informants and survey responses. When informants identify two or fewer practices as integrated, researcher does not consider practices as integrated without additional data (MD 715 and/or FEVS) confirming or disconfirming the degree practices are integrated. Informants identify two or fewer practices, even no practices but the employees view the agency as integrating practices. The majority (60 to 70%) of employee surveys view their leaders as integrating practices. This also means there are 30 to 40% employee surveys that either do not agree, or neither agree nor disagree that leaders integrate practices. This may be an indicator that some practices are not integrated. Two questions indicate how employees view their supervisor, manager, or section rather than the entire agency. The other two questions indicate how employees view the integration of agencies' policies. Employees, depending on where they sit in the

agency, may or may not have the ability to provide feedback on whether the agency's policies and programs promote diversity in the workplace or if prohibited personnel practices are not tolerated. The inconsistencies may indicate there are gradual degrees of integration, at least from where the employee participating in the survey sits.

Table 9b Consistencies and Inconsistencies of Combined Interview and FEV Survey Data - Degree Practices Integrated  
(expanded version of table 9b see Appendix N)

<b>Combined Interview and FEV Survey Data - Consistencies and Inconsistencies</b>		
*Of the 18 leaders, researcher used agency data for nine leaders from sub agencies because their individual sub agency data was not available.		
<b>Case</b>	<b>Two or less practices not considered integrated (Interview Data)</b>	<b>FEVS Note: No FEVS in 2009</b>
<b>EEO/DIV LEVEL LEADERS</b>		
Isabel		
Inconsistent	2 Practices Integrated	Above median
Alex - *Agency data		
Consistent	3 Practices Integrated	Above median One year of data
Ophelia - *Agency data		
Consistent	4 Practices Integrated	Above median
Stan		
Consistent	3 Practices Integrated	Above median
Ingrid - *Agency data		
Inconsistent	1 Practice Integrated	Above median
Lilly		
Inconsistent	No Practices	Above median
Camille - *Agency data		
Inconsistent	2 Practices Integrated	Above median
<b>MIDDLE MANAGER LEVEL LEADERS</b>		
Dean		
Inconsistent	1 Practice Integrated	Above median
Lenny - *Agency data		
Inconsistent	2 Practices Integrated	Above median
Jose		
Inconsistent	1 Practice Integrated	Above median
Agnes - *Agency data		
Consistent	3 Practices Integrated	Above median
Willa- *Agency data		
Inconsistent	1 Practice Integrated	Above median
Nate - *Agency data		
Inconsistent	1 Practice Integrated	Above median
Alena		
Inconsistent	2 Practices Integrated	Above median

**SENIOR LEVEL  
LEADERS**
**Alicia - \*Agency data**

Inconsistent

1 Practice Integrated

 Below median  
2015 and 2016.  
Above median  
2017

**SUMMARY**

Of the 18 leaders, 11 had MD 715 data, 15 had FEVS data, three leaders (Sergio, Nadine, and Mitch) did not have MD 715 or FEVS data to compare with interview data, and one leader (Lilly) did not report any practices. When comparing interview data with MD 715 reports or FEV surveys, there were both consistencies and inconsistencies found. Few informants (2) identified three or more practices as integrated and the MD 715 report and FEVS consistently reported practices as integrated for Ophelia and Agnes. Conversely, informants identified two or less practices as integrated, yet the MD 715 or FEVS reflect more practices are integrated. In one situation, the informant did not identify any practices (Lilly) yet FEVS score of above median indicate practices as integrated. Practices are integrated to varying degrees. Similarly, MD 715 data indicate most but not all practices as integrated, yet EEO/diversity and middle leaders (Ingrid, Dean, Jose, Willa) only identified one practice as integrated. These inconsistencies are significant especially since leaders should be aware of practices that are integrated. Such inconsistencies may indicate some practices are gradually integrated while other practices are symbolically integrated.

Out of 18 leaders, most (15) integrate practices to varying degrees. In part four, using findings from this section and previous sections (section one and two), researcher analyze how representation at the SES level influence the integration of practices.

**Chapter 4****Findings Pt 4: Integration of Practices - Influence of SES Minority Representation**  
(Table 10)

**Question 4:** How did the representation of minorities at the SES level influence the integration of practices?

**Findings 7:** Minority and non minority representation at the SES level do not influence the integration or lack of integration of practices. Leaders of five out of 18 had minority representation at the SES level ranging from one to six years during the research period. Minority and non minority representation integrated practices similarly at varying degrees. Minority and non minority representatives with no MD 715 reporting requirements integrated practices. Lilly had minority representation (2005, 2006, 2007, 2016, and 2017) and there were no programs integrated. Sergio and Mitch had non minority representation and there were no programs integrated or reports required.

To analyze how the representation of minorities at the SES level influence the integration of practices (Table 10):

- 1 – Programs integrated
- 2 – Overall analysis of MD 715 Reports
- 3 – Overall analysis of Federal Employee Viewpoint Surveys

Researcher compared data from interviews, reports, and surveys with representation of the agency head to understand how representation influence the integration of practices (see Table 10). Representation at the SES level does not influence whether practices are integrated. Of the 18 leaders, 13 leaders had non minority representation at the top level in their agency during the reporting period of this research (2004 through 2017). Five leaders had minority representation ranging from one to six years during the research period. Three leaders (Lenny, Agnes, Nate) had representation for one year, one (Lilly) five years, and one (Nadine) six years.

**Minority Representation – Agency Head****Minority Representation – Practices Not Integrated**

Lilly had minority representation for five years but there were no practices integrated. Lilly is responsible for conducting barrier analysis and informing the agency head of racial disparity and underrepresentation. Lilly has completed action plans to address underrepresentation but states, “It’s difficult to try to get them to do anything”. The agency is small, according to Lilly and the focus is on external customers in the community and not internal employee issues such as minority representation. Lilly did not identify any practices as integrated. Nadine had minority representation for six years and one practice, training, was integrated. Nadine stated the agency is aware of the lack of minority representation. Much of the reason is attributed to the specialized jobs in the agency. When hiring, they do not focus on race but job specialty and that has resulted in the underrepresented minorities in the workforce. According to Nadine, they grapple with and have been unable to resolve this issue. Nadine states the concern is how to make the workforce diverse and not dilute the mission because they are unable to find qualified minority candidates. Since the MD 715 was not available for Nadine, it was difficult to analyze if minority representation at the SES level influenced integration of additional practices across time. The similarity between both Lilly and Nadine’s agencies is they are small and have a high level of SES. This may or may not be a factor in the degree practices are integrated.

Minority Representation for One Year – Little Impact

The three leaders, Lenny, Agnes, and Nate, with minority representation for one year, integrated between one to three practices. Their MD 715 reports indicated practices were integrated but only covered one year. It is unlikely that minority representation for one year influenced these practices because Lenny, Agnes, and Nate stated these practices existed 10 or more years, which means practices were integrated before there were minorities represented at the SES level. Lenny works closely with the EEO office identifying ways to target diverse candidates. The agency head is also involved in this initiative. Additionally, when barriers preventing minorities from advancing or being hired, Lenny creates policies and programs to address the issue. Agnes describes the agency head and other SES as progressive when referencing initiatives to ensure the agency mirrors the community it serves. Agnes states the agency head views these types of initiatives as a plus, stating, “It makes a better agency with diverse representation and gives a broader view of what’s going on in the community”. Nate states, “Title VII laws for EEO programs are not established in the agency. It was moving along pretty good during President Obama Administration but it began to move slowly when President Trump came into office”. Nate speaks strongly against management’s discriminatory practices stating management met with him and voiced their concern that he hired too many minorities. When Nate responded, there are offices that do not hire minorities, management did not respond. Findings above are not significant enough to understand of the degree minorities as agency heads influence the integration of practices.

Non-Minority Representation – Mixed Results

Leaders Isabel, Alex, and Stan had non minority representation at the SES level and their interview data indicated their agency integrated practices across time. An MD 715 report was not required for these agencies. As stated in the analysis in the previous section, leaders' with both interview and MD 715 integrated practices in varying degrees. Isabel stated their barrier analysis work group and climate assessments were introduced to senior levels for their involvement and support. Initially, according to Isabel, "We received push back from some SES, but once the agency head said this is what will happen, they all lined up". The agency head leads these practices and influence the use of these practices by enforcing policy. Isabel stated senior level leaders now support these practices. Alex does not mention support or lack of support of the agency head. Alex attributes the ability to implement programs to the effectiveness of the EEO office. Stan's agency has integrated practices but according to Stan, "EEO is on the bottom of the priority list". Stan did not mention support or lack of support from agency head. Of the 13 leaders with non minority representation at the SES level, 12 identified one to four practices as integrated. Ophelia and Camille MD 715 data indicated some, but not all practices were integrated. Ophelia considered the agency head responsible and influential in integrating their Special Emphasis Programs, diversity councils, and training programs. Camille indicated the programs to address underrepresentation were integrated but only within the field offices but not at the headquarters level where Camille worked. Two leaders (Sergio and Mitch) with non minority representation had no reporting requirements and there were no practices. Similarly, leaders' FEVS data report index scores were all above median except one (non minority), Alicia's score was

below median 2015 and 2016 but rose to above median in 2017. Minority and non minority representation at the SES level do not appear to influence the integration or lack of integration of practices. These findings are not consistent with studies that suggest minority representation at the senior level influences the adoption and integration of equity and diversity practices (Nishii, Gotte, Raver, 2007). One caveat to Nishii, Gotte, and Raver's research is EEO/diversity offices with real influence will benefit from these results. Findings from this research do not reflect EEO/diversity professionals have clout and power as indicated in Nishii, Gotte, and Raver's research. Perhaps instead of looking at representation, the SES leadership style may have an impact on the degree practices are adopted and integrated. Research suggests senior level leadership styles may be a predictor of whether practices are implemented or not (Ng, Sears, 2011).

Table 10 Representation of the Agency Head  
(expanded version of table 10 see Appendix O)

<b>Influence of Representation of the Agency Head</b>				
Influence of minority representation at the SES level on the integration of practices Used MD 715 reports, agency websites, and other online sources for agency representation.				
Case	SES Representation	Practices Integrated	MD 715	FEVS Note: No FEVS in 2009
<b>EEO/DIV LEVEL LEADERS</b>				
Isabel				
Inconsistent	Non minority	2 Practices Integrated	No report req'd	Above median
Alex				
Consistent	Non minority	3 Practices Integrated	No report req'd	Above median
Ophelia				
Consistent	Non minority	3 Practices Integrated	Rpt 2012-2016	Above median
Stan				
Consistent	Non minority	3 Practices Integrated	No report req'd	Above median
Ingrid				
Inconsistent	Non minority	1 Practice Integrated	Rpt 2004-2017	Above median
Lilly				
Unable to do comparison	Minority 2004-06 Minority 2016-17	No Programs	No report	Above median
Camille				
Inconsistent	Non minority	3 Practices Integrated	Rept 2012-2016	Above median
<b>MIDDLE MANAGER LEVEL LEADERS</b>				
Dean				
Inconsistent	Non minority	1 Practice Integrated	Rpt 2008-2016	Above median
Lenny				
Inconsistent	Minority 2017	2 Practices Integrated	Rpt 2016	Above median
Jose				
Inconsistent	Non minority	1 Practice Integrated	Rpt 2006, 2007, 2009, 2011	Above median
Agnes				
Consistent	Minority 2017	3 Practices Integrated	Rpt 2014	Above median
Willa				
Inconsistent	Non minority	1 Practice Integrated	Rpt 2004-2017	Above median
Nate				
Inconsistent	Minority 2017	1 Practice Integrated	Rpt 2016	Above median
Alena				
Inconsistent	Non minority	2 Practices Integrated	Rpt 2008-2016	Above median
Sergio				
Unable to complete comparison	Non minority	No programs	No rpt req'd	No report req'd
<b>SENIOR LEVEL LEADERS</b>				
Nadine				
Unable to complete comparison	Minority 2012-2017	No programs	No rpt req'd	No report
Alicia				
Inconsistent	Non minority	1-Special Emphasis Prog	Rpt 2014	Below median 2015 and 2016. Above median 2017.
Mitch				
Unable to complete comparison	Non minority	No programs	No report req'd	No report req'd

## Findings Chapter Summary

This chapter presents ten findings from this study. Researcher warns findings are a representation of EEO/diversity managers, middle managers, and SES based on how researcher understand informants' experiences and perceptions within the context of their environment. Findings are organized according to research questions. Data from interviews, MD 715 reports, FEVS, and agency websites (representation data) reveal leaders and employees' views, and leaders experiences of the adoption, implementation, and integration of EEO and diversity practices and programs.

Researcher identifies the first four findings in this paragraph. The first finding of this research, using a study from Edelman et al., is middle managers and EEO/diversity managers respond similarly when integrating practices. Regardless of leaders' position, fewer leaders, one out of 18 (6%), used the Advocate strategy compared to Edelman et al. two out of five (40%). More, 12 out of 18 (67%), used the Team Player strategy compared to Edelman et al. one out of five (20%), when integrating practices. Legal mandates continue to influence the integration of practices yet, unlike the research of Edelman et al., a second finding reveals an effort to distance programs from race-based initiatives has increased. A third finding is pressures exerted on and brought by middle managers to integrate practices closely resemble EEO/diversity managers. Normative pressure may influence others outside of the professional network to operate within the network. Middle managers appear to operate within the professionalism of EEO/diversity managers without EEO and/or diversity related certifications, which is outside of the framework of normative pressure. Whether middle managers, EEO/diversity managers, or SES, with the exception of the middle manager employing the Advocate strategy, all leaders appear to appease the agency head regardless of

institutional pressure. This fourth finding indicates that senior leaders and agency heads' responses to influences may have a trickle down effect on the three levels of leaders and the degree practices are integrated. Political influence, personal motivation, and other pressures may influence agency heads instead of legal mandates or copying others.

The fifth finding is middle managers are viewed by all levels of leaders as responsible for the integration of practices. When viewing which leaders adopted, implemented, maintained, and integrated practices, middle managers integrated more practices (62%) than the EEO/Diversity managers (56%). EEO/Diversity managers were responsible for adopting, implementing, and maintaining most practices while SES did not adopt, implement, maintain, or integrate any practices identified.

The sixth finding is practices, as in previous research, are adopted and integrated due to legal mandates. Of the 47 practices identified by leaders in this research, 55% exist due to coercive, 30% (EEO and diversity offices) due to combined coercive and normative, 4% due to both coercive and mimetic, 11% due to mimetic pressures.

The seventh finding from seven MD 715 reports that ranged in years between 2004 and 2017 were analyzed. Five (Ingrid, Dean, Jose, Willa, and Alena) of seven leaders' agencies integrate most of the practices identified in the report. Two (Ophelia and Camille) of seven leaders' agencies indicate some, but not all practices integrated. Four reports (Lenny, Agnes, Nate, and Alicia) provided data for one year indicate most practices identified in the report are integrated, but data could not be analyzed across time. There are inconsistencies between the MD 715 data indicating practices were integrated across time and the interview data provided by leaders. Few leaders provided interview data consistent with MD 715 data. Many leaders identified two or fewer

practices as integrated while their MD 715 data indicated some or most practices were integrated. Because EEO/diversity and middle level leaders are expected to adopt and implement practices, they should be aware of most practices listed in their MD 715 report. Some of these inconsistencies may be due to symbolic integration of practices.

The eighth finding from the FEVS, is employees from 13 leaders' agencies stated practices are integrated within their agencies across time (2008 through 2017). Specifically, most employees perceived policies and programs promoted diversity in the workplace, Prohibited Personnel Practices were not tolerated, their supervisors were committed to a workforce representative of all segments of society, and worked well with employees of different backgrounds resulting in index scores above median. One leader's agency participated in the survey for one year and results could not be analyzed across time. However, index scores were above median for leader's agency indicating practices are integrated. Employees from one leader's agency stated practices were not integrated within their agencies in 2015 and 2016 but integrated in 2017. Survey data was not available for 3 leaders' agencies due to non-participation or no federal requirement to participate. Similar to the MD 715 data, there were inconsistencies. There was a difference between FEVS scores and interview data. Few informants (2) provided consistent data that identified three or more practices as integrated and the MD 715 report and FEVS consistently reported practices as integrated. FEVS scores indicated employees view their leaders as integrating equity and diversity practices whereas leaders' interview data indicate practices are gradually integrated and some not integrated at all.

The ninth finding compared interview, MD 715, and FEVS data to assess to what degree practices are integrated. Of 18 leaders, 11 had MD 715 and FEVS data, four did not have MD 715 data and three did not have either MD 715 or FEVS data. Nine out of 11 leaders' data were inconsistent and reflected varying degrees of integration of practices. Two out of 11 leaders' data were consistent, where two consistently reported practices were integrated. Of the 18 leaders, four did not have MD 715 data but had FEVS data, for a comparison of interview and FEVS data. Two out of four consistently reported practices were integrated, one leader's data were inconsistent, and one leader did not have practices. Of the 18 leaders, three did not have MD 715 or FEVS data for comparison with interview data.

The tenth finding is minority and non minority representation at the SES level do not influence the integration or lack of integration of practices. Leaders of five out of 18 had minority representation at the SES level ranging from one to six years during the research period. Minority and non minority representation integrate practices similarly at varying degrees. Minority and non minority representation without MD 715 reporting requirements integrate practices. Conversely, there was minority representation at the SES level whose agency had MD 715 reporting requirements but did not integrate any practices.

These findings have important theoretical implications that may or may not be specifically within context of federal agencies. Most informants identify legal mandates as the reason they adopt and integrate practices. Due to the inconsistencies between programs informants identify and those identified on reports and surveys, coercive pressures, when are exerted, leads to more symbolic implementation. This finding aligns

with extant research. Despite legal mandates, researcher finds senior leaders exert substantially more influence over leaders when integrating practices. Leaders within agencies will follow whether the head agency is legally, politically, or personally influenced. Another theoretical implication is when middle managers are tasked with implementing equity and diversity practices they experience the same normative pressure and resemble EEO/diversity managers. Normative, which is usually exerted on those within a network or certain professional group (e.g. EEO/diversity managers), is also exerted on middle managers' and their response is similar to those within the profession. Lastly, as the number of practices that focus on representation decrease and as diversity efforts redefine representation, ambiguity increases, making it more difficult to address minority representation at the SES level. Researcher briefly discussed theoretical implications here and will discuss how implications may lead to further research in chapter five.

## Chapter 5 – Analysis of Findings

The purpose of this study is to analyze, through in-depth interviews with a sample of 18 agency leaders, how shifts in both leaders' responsibilities and institutional pressures influence the integration of equity and diversity practices. Researcher supplemented interviews with reports and surveys to analyze the degree to which leaders integrated EEO and diversity practices in federal agencies and how representation of minorities at the head of agencies influence the integration of practices. The degree to which leaders integrate practices in agencies vary and existing research is mixed on how institutional pressures influence the integration of equity and diversity practices. It is the expectation of the researcher that findings from this study may give leaders at various levels in organizations a more informed perspective on how influences impact integration of not only equity and diversity but also other practices. Additionally, this research may add to existing literature on how minority representation at the executive level influences the integration of equity and diversity practices. This research uses data from interviews with EEO and diversity professionals, middle managers, and Senior Executive Service. Additionally, this research used Management Directive (MD) 715 reports and Federal Employee Viewpoint Surveys (FEVS) from selected agencies. The MD 715 reports ranged from fiscal years 2004 through 2017, based on the availability of reports.<sup>2</sup>

The data were coded, analyzed, organized by the three levels of leaders responses to research questions. Data were further analyzed and placed in categories within the

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<sup>2</sup> Fiscal year is from October 1st of the previous year through September 30th of the current year (e.g. fiscal year 2004 is October 1, 2003 – September 30, 2004). The FEVS were from calendar years 2008 through 2017.

four-part typology and sub categories according to the conceptual framework in chapter two. This study is based on four research questions:

- 1) How do shifts in leaders' responsibilities influence the integration of practices?
- 2) How do shifts in institutional pressures influence the integration of practices?
- 3) To what degree are practices integrated by three levels of leaders?
- 4) How does the representation of minorities at the SES level influence the integration of practices?

Findings from these questions were discussed in chapter four. The overall finding in this research reveals all levels of leaders integrated practices to some degree. A significant finding is how the middle managers emerge in their role and integrate practices as EEO and diversity managers and senior leaders have a lesser role. Findings also indicate legal mandates, or coercive mechanisms, continue to be the overall influence but often combined with normative and mimetic when practices were integrated to varying degrees. Lastly, whether minority or non-minority executives led agencies, they integrated or did not integrate practices similarly. Additionally, findings reveal leaders are increasingly abandoning their focus on representation when adopting, implementing, maintaining, and integrating programs.

In this chapter, researcher will discuss analysis of these findings. Additionally, this chapter interprets and synthesizes the findings into analytic categories used in chapter four to code data, based on the following research questions:

Analytic Category 1 - How shifts in leaders' responsibilities influence the integration of practices (Research Question 1)

Analytic Category 2 - How shifts in institutional pressures influence the integration of practices (Research Question 2)

Analytic Category 3 - The degree to which practices are integrated by the three levels of leaders (Research Question 3)

Analytic Category 4 - How representation of minorities at the SES level influence the integration of practices (Research Question 4)

Analysis of findings is presented similar to chapter four, by analytic category. The researcher analyzed data for patterns of similarities and differences, connections, and emerging themes that lead to key assertions. For further analysis, based on issues raised by the literature, the researcher combines relevant theory and research themes (Bloomberg, Volpe, 2008, Miles, Huberman, Saldana, 2013).

The discussion takes into consideration the literature on neoinstitutionalism, organizational theory, diversity, and representative bureaucracy. The implications of these findings are intended to add to the understanding of how shifts in leaders' responsibilities and institutional pressures influence the integration of equity and diversity practices. Findings are also expected to add to the understanding of the degree to which leaders integrate practices and how representation at the SES level influences the integration of practices. Finally, the purpose of this research is to build on existing theory or fill gaps that may exist in literature or both. The conclusion of this chapter examines the researcher's assumptions identified in chapter one, provides a summary of the overall analysis, and the effect of possible researcher bias in interpreting findings.

## **Analytic Categories 1 – 4 – Category 1**

**Analytic Category 1:** How Shifts in Leaders' Responsibilities Influence the Integration of Practices

*The first research question sought to understand, through the use of the four-part typology, both how leaders' view their responsibility and how their responsibility to integrate practices shifted since the 1991 study by Edelman et al. (Edelman, Petterson, Chambliss, Erlanger, 1991).*

### Four-Part Typology

Since research by Edelman et al. in 1991, there are fewer Advocates. Also, two additional leadership levels are included in this research as responsible for integrating equity and diversity programs, middle managers and Senior Executive Service. This research, compared to the study completed by Edelman et al., is not exactly comparing fuji apples to fuji apples. It is more like a comparison of fuji, gala, and braeburn apples, they are all apples just different types. Edelman et al. compared Affirmative Action Officers to one another. Today, responsibility for equity and diversity practices in federal agencies has expanded to three levels of leaders: EEO/diversity manager, middle manager, and SES. Of the 18 informants, one used the Advocate strategy, 12 used the Team Player strategy, four Professional, and one Technician. As stated in the previous chapter, informants did not all fit neatly into one strategy but multiple strategies. When matching the strategy with the informant, researcher used the strategy that was most dominant in the informant's approach to adopting, implementing, maintaining, and

integrating equity and diversity practices. Informants that used the Team Player strategy varied in their responses. Surprisingly, of all the leaders, a middle manager uses Advocate strategy and not an EEO/diversity manager.

#### Advocate

The middle manager using the Advocate strategy opposed his management's practices that appeared to violate hiring practices. According to Nate, management met with him to discuss their concern that he hired too many minorities. Nate's response to management was there were offices within the agency that did not hire minorities, with the intention of highlighting an illegal hiring practice. Management did not respond to his allegation. The Advocate strategy does not appear to be popular and perhaps has become less popular across time.

#### Team Player

There are 12 informants who use the Team Player strategy. Stan, an EEO/Diversity manager stated, there are programs but programs to address minority underrepresentation are at the bottom of the priority list. Stan expressed disapproval of the low priority placed on practices but did not indicate the ability to impact change. Camille, an EEO/Diversity manager, provided programs for underrepresented groups in the field offices but not at headquarters level where she sits. Although she worked at the level with the oversight of these programs, she was not aware if the programs were implemented in the field offices, as she stated, "The programs are supposedly conducted at the field levels". Camille did not indicate any planned action to integrate these

programs at the higher level or verify if the programs were implemented at the field level. Camille appears content with current practices.

Dean, middle manager, identified programs but states the programs, internships and mentoring, are for all employees. Dean shared his experience with the agency stating minorities have college degrees but non minorities in the same grade do not. Dean expressed displeasure with internal practices that negatively impacted him but did not indicate plans to address with management. Similar to Dean, Jose discussed his experiences within the context of his career. Jose has hopes of becoming an SES and participated in the SES career program. He also stated the demographics have changed over the last decade from white male to increased racial diversity. Jose stated his agency offers a mentorship program that focuses more on replacing the aging population. Jose appears content with current practices.

Although Willa and Alena, middle managers, were not directly involved in integrating practices, they both agreed it was the middle manager's responsibility. Both informant's state their agencies have practices to address representation. Alena is one of the few informants with a program designed specifically to prepare minorities for SES positions. Sergio works for an agency that does not have a requirement for equity or diversity programs. Sergio did not identify any practices as integrated but stated their existing staff is diverse and a diverse committee selects candidates. Willa, Alena, and Sergio appear content with current practices.

Nadine, an SES, works in an advisory role and not responsible for a section or department within the agency. The agency's challenge, according to Nadine, is to recruit and hire a racially diverse workforce without diluting the mission. Because the jobs are

highly specialized, Nadine states the demographic selections are not on purpose but their recruiting strategy is to find the best qualified and not quotas. Nadine states, in the effort to recruit minorities into these specialized positions, there appears to be a dearth of minority candidates. Nadine's dilemma of hiring minorities is an issue but appears content with existing practices.

Also an SES, Alicia views her role as responsible for integrating practices. Her agency has an SES development program for all employees but there are no specific programs for minority career development. When identifying programs addressing minority representation, Alicia states, they only have Special Observances programs. This program is often mentioned interchangeably with Special Emphasis. Alicia refers to programs for events such as luncheons to commemorate an observance relating to certain groups or a person (e.g. National Hispanic Heritage Month, Martin Luther King, Jr., etc.). She states, in her experience across different federal agencies, she has only seen these types of programs but no leadership development programs for minorities or any robust activities to target minority groups. Alicia appears discontent with current practices but did not indicate she had the ability to impact change.

Ingrid, EEO/diversity manager states there are many activities but she has not seen an impact in over 10 years. One of Ingrid's responsibilities is to identify barriers that prevent minorities from entering SES positions. Her agency head states every leader is responsible for integrating equity and diversity programs. Ingrid agrees with her agency head but she has a roadblock to integrating practices. According to Ingrid, she states she is unable to be effective her job because she has not received the cooperation of Human Resources through the creation of policies, systems, and programs that address or

monitor current practices. Ingrid expresses her discontentment with current practices but did not indicate she had the ability to impact change.

Ophelia, EEO/diversity manager, was difficult to place within the four-part typology because the informant was robotic and did not give any indication contentment or discontentment with her program. She viewed the integration of programs as her responsibility but considered the agency head as most responsible and influential in integrating their practices: Special Emphasis Programs, diversity councils, and training. Mitch, SES, was also difficult to place in a category. Mitch works in an agency that is not required to implement equity and diversity programs and was unable to identify any practices that were integrated. Mitch mentioned proposed initiatives such as creating a program to increase racial diversity amongst candidates and recruit from local minority serving institutions. He states race is not a consideration, yet ensures panels are diverse when hiring new employees. He attributes the diverse panel as the reason they hire a qualified and a racially diverse workforce. Mitch states that a workforce that mirrored their clients may better service their clients, as he considers demographics of his clientele when discussing initiatives.

#### Team Player Summary Analysis

The Team Player strategy varies amongst the three levels of leaders where some are content with existing practices and others are not. Stan, Alicia, and Ingrid are discontent with existing practices but all appear helpless to affect change. Dean expressed discontentment also with existing practices, but within the context of his career opportunities. The responses were similar based on how they understand their ability or lack of ability to influence the integration of practices. Whether content or discontent

with practices, those using the Team Player approach did not resist existing practices. This passive response was prevalent amongst those using the Team Player approach regardless of level (EEO/diversity, middle manager, or SES). Ophelia and Mitch's strategies were difficult to identify because neither expressed contentment nor discontentment. Ophelia states the agency head has the most influence over practices but did not indicate loyalty to employees and loyalty to management was implied by researcher. Mitch identified many initiatives but has no requirement to implement practices (and has not). Mitch did not express loyalty to either the employee or management. There may be an opportunity for future research to explore new strategies that may have evolved since Edelman et al.'s research. Next, researcher discusses the Professional strategy.

### Professional

There are four informants who use the Professional strategy. Isabel, EEO/diversity manager, worked with multiple offices implementing, monitoring, or providing oversight and support of programs. Isabel states, senior leaders are directly involved in establishing policies for equity and diversity programs to promote fairness across the agency. Their involvement also include establishing goals and roadmaps of expected timelines for implementation and outcomes of equity and diversity practices. Alex, EEO/diversity manager, remains neutral by implementing mandated programs that promote fairness. Alex uses the MD 715 and policies to address disparities. Alex also uses conflict resolution options through Alternative Dispute Resolution (mediation program). This program is used according to Alex to reconcile employee, supervisor, or manager's relationship when there are allegations of discriminatory practices.

Lenny, middle manager, views himself as responsible for integrating programs. He states he assists managers and EEO and diversity managers in identifying methods to find and recruit diverse candidates and implement policies, to include personnel policies and programs. Lenny works with SES in his agency to identify underrepresented groups within the agency and recruit from minority serving institutions (colleges and universities). His office has developed recruiting teams that comprise of employees and supervisors from different jobs to conduct target recruiting for underrepresented groups. He is also part of a team that conducts an analysis to pinpoint barriers that impede their progression in creating a diverse workforce. This group monitors the barriers to ensure the same barriers do not exist the following year.

Agnes, middle manager, similarly views herself as responsible for integration of programs, combining strategies that include imbedding equity and diversity policies within personnel policies. Her approach is different in that she focuses on external customers, her surrounding community, with an emphasis on policy and representative bureaucracy. Agnes refers those in the position of SES as progressive thinking people, meaning they are looking for ways to improve the agency and ensure the workforce is diverse to serve a diverse community. Agnes states there is no requirement for the workforce to mirror the community yet those in leadership work closely with Human Resources to identify and match their community demographics. She does not view the EEO and diversity manager as a catalyst in promoting a diverse workforce except to track numbers or handle a complaint. Unlike Lenny, who worked closely with the EEO and diversity manager, Agnes does not appear to see the usefulness of that position.

Professional Summary Analysis

Of those who use the Professional strategy, Isabel, Lenny, and Agnes are similar in that three out of four reported they work with other offices and there is senior level involvement. Alex does not indicate collaboration with other offices or senior level involvement. The shift in roles include middle manager involvement in equity and diversity practices, Lenny states he is involved in minority recruiting, barrier analysis to identify progression in creating a diverse workforce, and assist EEO in implementing policies, programs, and practices. The middle manager resembles the EEO/diversity manager in that these are not practices usually conducted by middle managers but EEO/diversity managers. Next researcher discusses Technician strategy.

#### Technician

Lilly, EEO/diversity manager states she provides statistical data to leadership. Specifically, she states although she presents action plans to address barriers preventing racial minority groups from opportunities, senior leadership does not change their existing practices. Lilly stated, “It’s difficult to get them to do anything”, referring to senior leadership. Although there are many SES within Lilly’s agency, the prevalent practice focuses on creating fast track career progression within the agency for college students.

#### Technician Summary Analysis

One EEO/diversity manager used the Technician strategy. Lilly also appeared to use the Team Player strategy. Researcher placed informant in Technician because informant states her only job is to provide statistical analysis (demographics) for agency leaders.

#### Four-Part Typology Summary Analysis

In summary, as Lilly acquiesce and was unable to identify any practices adopted, those that employ the Team Player strategy identify practices that were adopted but many practices neglect to give consideration for issues of minority underrepresentation. Key actors integrate practices for multiple reasons but often adopt practices as indicators of compliance rather than integrating them in response to technical demands (Meyer, Rowan, 1977, Edelman, 1992, Bromely, Powell, 2012). Most leaders that employed the Professional strategy worked collaboratively with other offices on equity and diversity practices and their senior leaders were involved in integrating practices. In leaders' effort to address the underrepresentation of minorities in SES positions, collaborative initiatives throughout the agency may prove impactful when integrating practices. As Technicians and Team Players acquiesce to the demands of the agency heads, if the priority does not include increasing representation at the SES level, there may be little change. Even though the Advocate strategy produces change, the change may be in a silo or within the section or department where the Advocate works, which may or may not include SES positions. Regardless of the level of leader (senior, middle, or EEO/diversity leader), perhaps the strategy employed may influence the degree practices are integrated. Extant literature suggests senior level leader involvement influences whether practices are integrated, while the EEO professional integrates practices because of their commitment to equity, and lastly, the middle manager is viewed more as an impediment to the integration of equity and diversity practices (Kelly, Dobbin, 1998, Westphal, Zajac, 2001, Kellough, Naff, 2004, Kalev, Dobbin, Kelly, 2006). This study departs from existing

research in that the middle manager now plays a significant role in integrating practices. This will be discussed later in this chapter.

There are commonalities amongst the leaders and the overarching motive of the leaders integrating practices may be for survival through legitimacy with agency leaders and employees. The Team Player, Professional, and Technician strategies are used to appease their agency leaders by integrating practices to the degree acceptable. Nate, who employed the Advocate strategy, did not aim to please his agency leader but instead his staff. He boasted of how his staff is loyal and grateful to him for providing opportunities for all groups, at the risk of conflicting with agency leaders. This may position Nate in a place of job security, in that his staff may defend him if agency leaders attempt to take disciplinary actions against him. Job security may also exist because of job status. Table two provides the job status of the informants. Their job status may impact the strategies used. Most informants were new in their position (seven years or less) but not new to federal government employment and were aware of how to operate within the government system to remain employed. The majority of informants worked in the same discipline over 20 years and observed EEO practices change across time from legal based Affirmative Action to diversity with decreased focus on race. Observing shifts across time may not have been palatable to all informants, but their tenure and grade level play a role in their understanding changes based on different Administrations and shifting from regulated to deregulated in more than just EEO programs. The grade level of informants ranged from GS-13 through SES. Informants explained they were established in their careers and very few were looking for advancement opportunities while some were considering retirement. Being established in top level positions may provide the three

levels of leaders job security to integrate, gradually integrate, or not integrate practices based on their understanding of the agency leader’s mission, goals, and other internal and external influences. Next, researcher will discuss how the three levels of leaders identify their responsibility and the responsibility of other leaders to integrate practices.

### **Three Levels – 3D View**

This section includes a three-dimensional view of how the three levels of leaders view their responsibility and the responsibility the other leaders. Leaders were asked to identify existing practices and what level of leader was responsible for adopting, implementing, maintaining, and integrating the practices. An example of informants’ responses is below from Table 4 in chapter 4. First researcher asked informants to identify practices. To assess which leader has the most influence in adopting, implementing, maintaining, and integrating practices, researcher asked interview questions 9, 10, 11, and 12.

**Table 4 Shifts in Leaders’ Responsibilities Influence Integration of Practices**

<b>Shifts in Leaders’ Responsibilities Influenced Integration of Practices (# is interview question)</b>						
<b>Case</b>		<b>#9-Introd Practice</b> Y-Yes N- No S-Shared Responsibility	<b>#10-Implem Practice</b> Y-Yes N- No S-Shared Responsibility	<b>#11-Maintain Prac</b> Y-Yes N- No S-Shared Responsibility	<b>#12-Most Influence</b> Y-Yes N- No S-Shared Responsibility	<b>Comments</b>
<b>EEO/DIV LEVEL LEADERS</b>						
<b>Isabel</b>						
	1-Barrier Analysis Wkg Gp	S	S	N	N	
	2-EEO Training	Y	Y	Y	Y	
	3-Climate Assessment	S	S	Y	S	

### How Three-levels View Senior Level

EEO/diversity managers identified 18 practices; middle managers identified 13 practices and both named senior level leaders and agency heads as moderately to significantly responsible for the degree practices are integrated practices. Nate, middle manager, blames the agency leader for not establishing EEO (Title VII) laws and Isabel, EEO/diversity manager, credited senior level leaders for establishing practices that assessed racial disparity and other programs. Similarly, Lenny, middle manager, credits senior level leaders for helping to establish practices for underrepresented groups (e.g. recruitment programs) while Agnes, middle manager, credits senior level leaders for seeking ways to ensure the workforce is representative of the community it serves. This research is consistent with existing research as both EEO/diversity managers and middle managers identify senior level leaders as moderately to significantly responsible for integrating practices (Kellough, Naff, 2004, Nishii, Gotte, Raver, 2007, Ng, Sears, 2011). Dependence on senior level leaders' blessings to integrate practices may be one of the reasons why many used the Team Player strategy when addressing minority representation. Instead of describing Team Players that did not insist on integrating practices as passive, compliant may be more appropriate. Senior leaders identified two practices but did not name themselves as being responsible for integrating practices. Despite senior level informants' lack of involvement in practices, they viewed themselves as moderately responsible for practices. Perhaps the low number of practices identified, two, impacted the senior leader's involvement. Senior level leaders view themselves as having a lesser role in integrating practices, while EEO/Diversity and middle managers view senior leaders as having a moderate to significant role, there may be an even greater

shift in responsibility. This leaves the researcher with the question, “Who is responsible for integrating practices?” Further analysis of reports and surveys in this research will reveal the answer to this question. Next, we will discuss how the three levels of leaders identify the EEO/diversity managers’ responsibility to integrate practices.

#### How Three-levels View EEO/Diversity Managers

There is evidence that subject matter experts or program managers (EEO, diversity, statisticians, etc.) integrate practices because of their commitment to their programs (Kelly, Dobbin, 1998, Tilscik, 2010). This research reveals EEO/Diversity managers identify their role as having a significant influence in adopting, implementing, maintaining, and integrating practices. Middle and senior level leaders identify EEO/Diversity managers as moderate to significantly responsible for adopting, implementing, maintaining, and integrating practices. It is clear EEO/Diversity managers, middle managers, and senior level leaders view these practices as EEO/Diversity managers’ responsibility, yet when practices are not adopted, EEO/Diversity managers vocalize their discontentment with senior level leaders, as though powerless to influence outcomes.

One EEO/diversity manager stated, there are programs, but programs that address minority representation are at the bottom of the priority list.

Another EEO/diversity manager stated, the EEO/diversity programs are aligned under the HR office and the HR office weakens the impact of these programs.

The researcher does not view EEO/diversity managers’ perception of powerlessness as inconsistent because, according to informants, the senior level leader approves practices as well as funding and resources necessary to adopt and eventually integrate practices

(MD 715). It was not surprising to find, of all the practices identified, the EEO/Diversity manager adopted, implemented, and maintained most practices. It was surprising to find that the middle manager integrated most practices. Finally, we will discuss how the three levels of leaders view the middle managers' responsibility to integrate practices.

#### How Three-levels View Middle Managers

The role of the middle manager, described in research as an impediment to EEO and diversity practices, has shifted to one who integrates practices (Kelly, Dobbin, 1998). This research reveals a new role and responsibility in adopting, maintaining, implementing, and integrating practices. The EEO/diversity manager does not identify the middle manager as having a significant, but a moderate responsibility in practices. Despite how the EEO/diversity manager identify the middle manager, the middle manager identifies their own role as significantly responsible for integrating practices while senior level leaders view the middle manager and EEO/diversity manager as equally responsible for integrating practices. Researcher attributes this shift to the decreased responsibility of EEOC, Affirmative Action, and Affirmative Employment Program Managers in the 1980s and an increased responsibility to agency heads. The agency heads, in turn, transferred responsibility to middle managers, which led to their involvement.

Lenny, middle manager, views himself as responsible for integrating programs and works closely with SES within his agency to identify underrepresented groups and establish programs. As a member of the barrier analysis team, he assists in identifying barriers that prevent equity for all groups and creates policies and practices to correct these issues.

Middle managers are involved and held accountable for integrating practices. Some middle managers are rated on how well they implement equity and diversity practices on their performance appraisals (MD 715). When working in the federal government, a phrase often heard throughout government agencies is, 'we must do more with less'. Additional responsibilities have been placed on middle managers, to include implementation of equity and diversity practices. This shifting role across time has left EEO/diversity managers with a continual decreasing role and may also be attributed to their sense of powerlessness when attempting to adopt practices. In previous years, EEO professionals were competing against newly established diversity professionals due to the similarity of their roles (Kelly, Dobbin, 1998). Now, based on this research, EEO professionals may have initiated a one-way competition against middle managers to maintain their relevance and need for their position within the agency. Unlike the competition or rivalry between EEO and diversity professionals, this competition is one-way because the middle manager is being put upon with additional duties such as equity and diversity programs while maintaining their position in finance, information technology, or logistics. Notwithstanding the one-way competition between the middle manager and EEO/diversity manager, the three levels of leaders exhibited common motives for their strategies identified to integrate practices.

### Three Levels – 3D View Summary

How the three levels of leaders view themselves and the other leaders differ. The senior level leader view their role as moderately involved in integrating practices and EEO/diversity and middle managers as equally significant in influencing practices. The

EEO/diversity and middle manager view the senior level leader's role as significant.

There is a one-way competition between the EEO/diversity manager and middle manager. The middle manager is not competing for the EEO/diversity manager's role but has been given the responsibility to implement equity and diversity practices. The middle manager views all levels of leaders, including themselves, as having a significant role. The EEO/diversity managers view middle managers as having lesser role but view themselves and senior leaders as having significant role.

#### Summary of Analytic Category 1

In summary, the leaders roles have shifted and all levels of leaders, to some degree, influence the degree practices are integrated. Since Edelman et al.'s research, more leaders view the adoption and integration of equity and diversity practices as their responsibility. Instead of one office responsible for practices, ownership for practices is throughout the agency with an emerging role of the middle manager. This research includes how the leaders view their role and the role of other leaders. Leaders' view of their roles and responsibility for equity and diversity programs may not be in synch with how other leaders view them, but all levels of leadership agree they are responsible to integrate practices. Middle managers have emerged as a prominent actor in integrating practices as EEO/diversity managers have a lesser role and seemingly authority to integrate practices. Senior level leaders do not view their influence to integrate practices the same as EEO/diversity and middle managers. EEO/diversity and middle managers view senior leaders as having a significant role in integrating practices, while senior leaders view themselves as having a lesser role. All levels of leaders admit they are

responsible for integrating practices. The involvement of the middle managers' integrating practices to increase the representation at the SES level is significant. Because middle managers are currently in the position that leads to SES (GS 13 through 15), they may either catapult practices or be a barrier to practices leading to increased representation in SES, depending upon their agency heads' mission. It appears all levels of leaders are doing what is expected based on the agency leader's priorities. Whether integrating, gradually integrating, or not integrating practices, whether or not their practices focus on race, leaders' response to institutional pressures may be evident in the choices they make. Next, researcher will discuss an unexpected finding and how pressures influence integration of practices.

### Unexpected Finding

An unexpected finding in this research was the emphasis of adopting and integrating practices without consideration for issues of underrepresentation. This was unexpected because, although informants were aware the topic of this research was to address minority representation and the practices adopted and implemented for that purpose, they identified these as prevalent practices. Previous research identified 16 practices (Table 1) presented to federal agencies from 1994 through 2011 to adopt as they addressed the problem of minority representation (Lanier, Young, 2015). During this research, informants identified the same or similar practices and 44% did not address minority representation. This is a departure from Kellough and Naff's research in 1999, when 95% of the federal agencies reported same or similar diversity programs addressed race (Kellough, Naff, 2004). There may be many reasons why these practices do not address minority representation. As the government streamlines programs, agencies may have combined practices (e.g. mentoring, career development, talent management, etc.). The majority stated they did not focus on race, while a few informants identified practices designed to address minority representation.

Lenny stated his office has developed recruiting teams that comprise employees and supervisors from different jobs to conduct target recruiting for underrepresented groups.

Agnes stated leadership works closely with Human Resources to identify and match their community demographics and meet their needs.

Dean stated there are programs that provide opportunities for advancement to SES, internships, and mentoring programs. None of the programs address minority representation but are open to everyone.

Nadine stated the demographic selections (of non minorities) are not on purpose but their recruiting strategy is to find the best qualified and not quotas.

This shift in integrating practices without consideration of underrepresented groups may be more intentional than unintentional. After all, one of the goals of diversity programs was to depart from race-based initiatives (Thomas, 2010).

**Analytic Category 2:** How Shifts in Institutional Pressures Influence the Integration of Practices

*The second research question sought to understand if institutional pressures shifted since 1991, how the shift influenced the integration of practices.*

Institutional pressure has not shifted since research conducted by Edelman et al. in 1991. In other words, informants identify an overwhelming majority of equity and diversity practices in this research as mandated by law. Equity practices and few diversity practices are influenced by law (Edelman et al., 1991, Edelman, 1992, MacLean, Behnam, 2010, Dobbin, Kalev, 2006, Pitts, Hicklin, Hawes, Melton, 2010). But institutional pressures are not static but shifting based on environmental pressures, changes in laws, political, or public influence (Ashworth, Boyne, Delbridge, 2007). Different pressures may influence practices more at a given time and at the time of this research, informants reported practices were influenced by legal mandates.

There were 47 practices, of which 55% existed due to coercive pressures, 30% (EEO and diversity offices) was due to both coercive and normative, 4% was due to both coercive and mimetic, and 11% was due to mimetic pressure. A statement most fitting to the findings of this research:

“...structures within organizations develop lives of their own. EEO/AA (Affirmative Action) law does not evoke immediate compliance or non-compliance, but rather a process of definition and adjustment. That process is shaped by the way in which affected parties mobilize the law to put pressure on organizations, by the politics and professional orientations of the affirmative action officers charged with managing EEO/AA law, and by the volatile nature of the relationship between affirmative action officers and their administration. These factors help to shape the strategies of the affirmative action officers, which in turn shape the character of compliance.” (Edelman, et al., 1991).

Leaders in this research responded based the legal mandate to adopt and integrate practices procedurally but not necessarily resulting in substantial compliance (Edelman, et al., 1991). Studies suggest coercive and mimetic pressures most often result in symbolic implementation of equity and diversity programs (Edelman, 1992, MacLean, Benham, 2010, Edelman, et al., 2011, Bromely, Powell, 2012). An overwhelming majority of practices identified in this research existed over five years. Researcher considered practices in existence for five or more years as integrated. This is not to imply practices are or are not implemented symbolically. Reports and survey results in the next analytical category will confirm or disconfirm the findings that practices are integrated. An example of informants' responses is below from Table 5 in chapter 4. First researcher asked informant if practices are based on legal requirements or best practices. The existence of EEO/diversity offices is identified as influenced by coercive and normative pressure. Next researcher asked informants how long practices existed to assess the degree practices are integrated.

Researcher asked questions 5 through 8, and 14.

Table 5 Institutional Pressures Influence Integration of Practices

<b>Institutional Pressures Influence Integration of practices (# is interview question)</b>					
<b>Case</b>	<b>#5-Programs and Dedicated EEO/Div Ofc</b>	<b>#6-C-Coercive #7-M-Mimetic #8-N-Normative</b>	<b>#14-Years Prog Exist 5+ years-integrated</b>		<b>Comments</b>
<b>EEO/DIV LEVEL LEADERS</b>					
Isabel					
	1-Barrier Analysis Wkg Gp	C/M	0-2 yrs		
	2-EEO Training	C	10+ yrs		
	3-Climate Assessment	C	10+ yrs		
	4-EEO/Div Ofc	N	10+ yrs		

Researcher will discuss practices and how coercive, normative, and mimetic pressures influenced leader's integration of practices.

The practices identified were: training, special emphasis programs/special observances/affinity groups, MD 715 working groups (to include barrier analysis), FEVS analysis, succession planning, target recruiting, councils, climate assessment, and EEO/Diversity Office. There were informants whose agencies were not required to adopt or integrate equity and diversity practices. Those informants were unable to identify existing practices but were currently in the early stages of establishing a practice while other informants identified practices that were integrated. Similar to Edelman et al., shifting the focus of research from existence or nonexistence of compliance to the process of compliance, researcher shift the focus from viewing practices as either integrated or not integrated to viewing the degree to which practices are integrated (Edelman, et al., 1991).

The degree to which practices are integrated may range from not integrated, gradually integrated to integrated. For a clearer understanding of the degree to which the practices are integrated, the researcher asked informants how long practices existed. The majority of practices identified, specifically those due to legal mandates, existed over 10 years. This would seem to imply coercive mechanisms have a profound influence on the integration of practices but the variation of practices is low. In 2015, the researcher conducted a study analyzing 14 documents dated from 1994 through 2011 to identify programs and practices recommended for adoption and integration specifically to address minority representation. This study resulted in 16 practices identified as either mandated or recommended to agencies to adopt and integrate to address this issue (Lanier, Young, 2015). Informants in this research identified nine different practices, of which, 2.6 represents the average number of different practices adopted. This average is taken from

the total number of informants and the number of practices adopted or not adopted. Two informants adopted five practices, five informants adopted four practices, two informants adopted three practices, four informants adopted two practices, three informants adopted one practice, and two informants did not adopt any practices. This low variation of practices appear to indicate the requirements for equity and diversity practices are declining along with coercive pressures, but according to the MD 715 report, the opposite is true. This will be discussed during analytic category three.

Another reason for low variation of practices may be that responsibilities for EEO/diversity practices shifted to other offices such as HR once the practice no longer focused on race (e.g. mentoring). One informant describes the cohesive work relationship with HR and the integration of practices designed for all employees while another informant describes a disjointed relationship with HR and how practices integrated by HR are designed for all employees and do not address minority representation. Leaders may have realigned practices based on internal and external mechanisms. Meaning, if the environmental pressures are to focus less on race while providing career progression and other programs for employees, leaders may seize the opportunity to establish or restructure practices to accommodate the pressure. If EEO/Diversity offices maintain their position to offer programs designated for underrepresented groups, that program may be eliminated from their office and replaced with an inclusive program in HR. The EEO/Diversity office may have challenges to survive and remain integral and relevant in the agency but according to this research, the EEO/Diversity office is identified as the most prevalent and integrated practice.

The EEO/Diversity office, according to informants, exists due to coercive pressure. Three out of 18 informants do not have an EEO/Diversity office. Two of the informants are not required to have an EEO/diversity program, while the other informant's EEO/diversity program is a function of the HR office. The remaining 15 informants have an EEO/Diversity office or representative to manage the program. Often, research suggests normative pressures influence EEO/Diversity offices as professionals are personally tied to the success of their programs (Tilscik, 2010). Normative pressures may also influence EEO/diversity professionals to adapt. Researcher observed less EEO/diversity professionals vying for a successful integration of practices and more survival despite the cost of departure from the original purpose of their programs. Unlike prior research when EEO specialists in federal agencies resisted the political influence under President Reagan to eliminate many equal employment opportunity programs and offices through downsizing, it appears EEO/diversity managers succumb to pressure (Kelly, Dobbin, 1998).

As stated previously, institutional pressures are not static but shifting (Ashworth, Boyne, Delbridge, 2007). Research suggests coercive pressures result in adoption but not integration of programs when agencies place EEO Specialists and Diversity Managers into positions without giving proper authority to institutionalize practices (Kalev, Dobbin, 2006, Edelman, et al., 2011). Researcher suggests institutional pressure continues to shift, now to mimetic. During interviews, middle managers' responses often resembled the EEO/diversity managers as though they manage a virtual EEO/diversity office. Middle managers view themselves as responsible for EEO/diversity practices and integrated more practices than EEO/diversity managers. This may be an indicator that

agencies began to resemble one another, decreased EEO/diversity manager involvement, increased middle manager responsibility and decreased accountability for practices.

When viewing EEO/Diversity offices as a program, this research suggests the integration of EEO/Diversity offices are influenced by coercive, normative, and mimetic. While EEO/Diversity offices were the most prevalent practice, practices influenced by mimetic were less prevalent.

Practices identified as influenced by mimetic pressure and integrated are diversity councils, customized training, Federal Employee Viewpoint Survey analysis, and barrier analysis working groups (influenced by both coercive and mimetic). Informants singled these out as best practices that were either adopted from other agencies or their own product now adopted by other agencies. Other practices (e.g. target recruiting, succession planning), are in the early stages, not yet integrated but adopted. There may be few practices integrated that are influenced by mimetic pressures because most informants imply without a legal requirement and senior leaders advocating for them, practices would not be adopted. Since researcher interviewed EEO and diversity professionals, researcher expected more mimetic pressure as diversity practices were introduced into the workplace. Additionally, the establishment of EO 13583 in 2011, mandating all agencies to create diversity offices, researcher expected leaders to mimic private sector and other public organizations' success within diversity programs (Weber, Davis, Lounsbury, 2009, EO, 2011, Kim, Kalev, Dobbin, 2012).

Another reason few practices are influenced by mimetic pressure may be due to the variety of practices that address race have declined. This change began in the private sector as companies led in adopting and integrating diversity programs federal agencies

followed, copying companies' best practices (Kim, Kalev, Dobbin, 2012). The dimensions of diversity seemed to grow in tandem with the popularity to exchange equity programs for diversity programs. Dimensions of diversity included personality, work and communication style are adopted by agencies and they converge in their practices, they look similar or they are isomorphic (Loden, 1996, Edelman, Fuller, Mara-Dritra, 2001, Kellough, Naff, 2004, Kalev, Dobbin, 2006). The few practices integrated are consistent with researchers previous study in 2015 (Lanier, Young, 2015). Through content analysis, researcher reviewed 14 documents to identify justifications given to agencies as a reason to adopt and eventually integrate practices. Out of 139 references to equity and diversity programs, only 13 referenced best practices as their reason while the overwhelming majority of 121 referenced representative bureaucracy. Analytic category four will discuss representative bureaucracy later in this chapter. Mimetic pressure influenced the integration of few practices and did not reflect the shift the researcher expected of being a major factor in influencing practices since previous research by Edelman et al. but there is an unexpected shift worth discussing.

Practices originally adopted to address minority representation but are now a mainstream practice in the agency for all employees should be explored through further research. Informants, when explaining the shift, often stated there were once practices that focused on representation but now those practices are available for everyone. Of the informants, 44% adopted practices but do not focus on race which is a significant change from Kellough and Naff's research in 1999 when 95% of agencies' diversity programs addressed race (Kellough, Naff, 2004). One informant stated their diversity programs do not address race and this may be the desired shift of diversity and inclusion practitioners.

Informants report the majority of practices identified are adopted and integrated because of legal mandates. However, leaders may be more influenced by normative pressure of diversity and inclusion practices than coercive because many informants stated their agency has shifted their priorities away from practices that focus on minority representation. The goal of diversity practitioners was to separate themselves from EEO programs and establish their own identity with inclusive practices for the entire agency (Thomas, 2010).

### Summary of Analytic Category 2

In summary, although I began my analysis stating institutional pressure has not shifted since the research conducted by Edelman et al. in 1991, there have been shifts. As is seen in this research, institutional pressures are not static but shifting (Ashworth, Boyne, Delbridge, 2007). According to informants, most practices are mandated by law. The practices informants identified as integrated that are influenced by coercive pressure, existed over 10 years. This is not to be interpreted that coercive pressure has a profound influence on integrating practices. It may or may not because the variety of practices averages out to about three different practices. Perhaps it is more accurate to suggest coercive pressure influences the integration of practices. Existence of practices influenced by legal mandates will not necessarily be sufficient to address minority representation at the SES level. When programs are a core function, they are likely to provide substantive value towards addressing the issue of underrepresentation. There was only one informant that identified a practice specifically adopted to assist minorities in GS 14 through GS 15 positions to prepare for SES. The latest legal mandate to address

underrepresented minorities in SES was the Executive Order (EO) 13583. EO 13583 mandated all agencies create diversity and inclusion initiatives to include minority recruiting practices to increase SES representation and create diversity offices. The EO along with previous EEO laws may have impacted the existence of EEO/diversity offices but not the representation of minorities in SES. In this research, the number of EEO/Diversity offices is significant and informants attribute legal mandates as the reason they are integrated as a practice. The offices are not only influenced by legal mandates but also normative and mimetic pressures. Mimetic pressure combined with other pressures influence the integration of practices but was also singled out for influencing a few practices. Leaders most often credited laws and mandates as the reason they integrated practices but leaders may be more influenced by normative pressure of the diversity and inclusion professional, as their agency shifts their priorities toward practices without consideration for representation.

**Analytic Category 3: The Degree to Which Practices Are Integrated By the Three Levels of Leaders**

*The third research question sought to understand the degree to which were practices integrated by the three levels of leaders.*

The degree practices are integrated varies amongst leaders. Interview data was available for all leaders but MD 715 and FEVS data were not available for all leaders' agencies. To assess the degree practices are integrated, researcher triangulated interviews, MD 715, and FEVS data when available. In some cases, only interview and FEVS data were available. When comparing reports and surveys with interviews, data were consistent for some leaders and inconsistent for others. Three out of 18 leaders did not have sufficient data that would indicate the degree practices were integrated.

Interviews, MD 715, and FEVS data was available for 11 out of 18 leaders. Interviews and FEVS data were available for four out of 18 leaders. Interview data without MD 715 reports or FEVS were available for three out of 18 leaders. Researcher will discuss the degree practices are integrated by each level of leader, EEO/diversity manager, middle manager, and SES. Leaders, identified by their pseudonyms, are categorized according to the three levels of leaders.

Figure 4 Informants' Pseudonyms

<b>EEO/DIV LEVEL LEADERS</b>
ISABEL
ALEX
OPHELIA
STAN
INGRID
SHE LILLY
CAMILLE
<b>MIDDLE MANAGER LEVEL LEADERS</b>
DEAN
LENNY
JOSE
AGNES
WILLA
NATE
ALENA
SERGIO
<b>SENIOR LEVEL LEADERS</b>
NADINE
ALICIA
MITCH

#### EEO/Diversity Manager

Interviews, MD 715, and FEVS data were available for three out of seven EEO/diversity managers. Of the three managers, Ophelia's MD 715, FEVS, and interview data consistently report some but not all practices are integrated. Ingrid and Camille data were inconsistent in that Ingrid's MD 715 and FEVS indicate most but not all practices are integrated yet Ingrid only identified one practice as integrated during the interview. The EEO/diversity manager works closely with the MD 715 report and should be aware of the status of practices. Ingrid confirm this inconsistency.

Ingrid stated, "I see these activities, but I don't see movement since 2006. Lots of ideas, but nothing materializes".

The MD 715 report indicated across 10 years, most but not all practices are integrated for Ingrid. Similarly, Camille's MD 715 report across five years indicated some but not all practices are integrated yet only two practices were identified during the

interview as integrated. During the interview, Camille reported the practices were offered in field offices but not at headquarters level. This inconsistency may be due partly because Camille is unaware of field offices activities. As stated in the interview, “programs are supposedly conducted at the field level”. The FEVS data for Ingrid and Camille across three years was above the median indicating overall employees view practices, policies, and leaders promote equity and diversity in the workplace. Inconsistencies may be due to symbolic integration of practices where what is reported in the MD 715 data is not what the leader’s agency does.

Interviews and FEVS data were available for four out of seven EEO/diversity managers. Isabel, Alex, and Stan interview and survey data consistently reflect practices are integrated or gradually integrated. Isabel worked with multiple offices implementing, monitoring, or providing oversight and support of programs. Isabel states, “Senior leaders are directly involved in establishing policies for programs to promote fairness across the agency.” Alex uses MD 715 data and policies to address disparities. However, Stan interview data indicate equity and diversity programs were at the “bottom of the list”. According to Stan, practices that did not focus on race were given a higher priority. MD 715 data for these leaders was not available and might provide a more in depth comparison of the degree practices are integrated. Lilly did not report any practices yet the FEVS data across ten years was above the median indicate overall employees view practices, policies, and leaders promote equity and diversity in the workplace. Because Lilly did not identify practices and the MD 715 report was unavailable, researcher was unable to compare the degree practices are integrated.

Overall, EEO/diversity managers integrate practices to some degree. The

inconsistencies between interview data and report/survey data are significant for Ingrid and Camille. There are more consistencies than inconsistencies with the EEO/diversity managers' data.

#### Middle Manager

Interviews, MD 715, and FEVS data were available for seven out of eight middle managers. One of eight middle managers did not identify any practices and there were no reports or surveys available. Of the seven middle managers, Agnes's MD 715, FEVS, and interview data consistently report practices are integrated. Although Agnes's MD 715 reported one year of data, interview data indicated three practices were integrated across 10 years and employees in the FEVS perceive practices are integrated across three years. Agnes stated her agency uses the FEVS to create ways to improve and their practices focus on addressing minority representation. The remaining middle manager's data are inconsistent.

Dean only identified one practice as integrated across 10 years and stated programs do not focus on race. The MD 715 reported across six years indicated that most but not all programs are integrated and employees, according to the FEVS, perceive practices are integrated across 10 years. Dean expressed discontentment with existing internal practices stating minorities have college degrees and non minorities in the same grade do not. Dean also states programs (e.g. mentoring and internships) are for all employees. Lenny only identified two practices (which focused on representation) as integrated across 10 years. The MD 715 reported only one year of data but indicated all programs are integrated and employees in the FEVS perceive practices are integrated across three years. Lenny states he assists managers and EEO and diversity managers in

identifying methods to find and recruit diverse candidates and implement policies, to include personnel policies and programs. Also, states he works with other SES in his agency to identify underrepresented groups within the agency, implemented target recruiting for underrepresented groups and monitors the barriers through an analysis process.

Similar to Dean, Jose only identified one practice as integrated across 10 years and stated programs do not focus on race. The MD 715 reported intermittently across four years that most programs are integrated and employees in the FEVS perceive practices are integrated across 10 years. Willa also identified only one practice as integrated across 10 years but unlike Jose, Willa's practice focus on representation. The MD 715 reported across 11 years indicates that most but not all programs are integrated and employees in the FEVS perceive practices are integrated across three years.

Nate only identified one practice as integrated across 10 years and stated programs do not focus on race. The MD 715 reported only one year of data but indicated all programs are integrated and employees in the FEVS perceive practices are integrated across three years. Nate strongly opposes his management's practices that appeared to violate hiring practices. Alena only identified two practices as integrated across 10 years and states programs focus on minority representation. Alena is one of the few informants with a program designed specifically to prepare minorities for SES positions. The MD 715 reported across six years that most but not all programs are integrated and employees in the FEVS perceive practices are integrated across 10 years. Researcher was unable to conduct a comparative analysis for Sergio. Sergio was unable to identify any practices and there were no MD 715 or FEVS data, but Sergio states their hiring team and staff are

diverse.

Overall, middle managers integrated practices to some degree. The inconsistencies between interview data and report/survey data are significant. Based on Dean, Lenny, Jose, Willa, Nate, and Alena's MD 715 and FEVS data, it seems unusual middle managers are unaware of more than one or two existing practices that address representation.

#### Senior Executive Service

Interviews, MD 715, and FEVS data were available for one out of three SES. Researcher was unable to conduct a comparative analysis for Nadine and Mitch. Nadine identified one practice, Mitch was unable to identify any practices and there were no MD 715 or FEVS data for either SES. Nadine states her agency struggles to find qualified minorities to fill their positions. Mitch states he does not focus on race but is considering creating a program to increase racial diversity amongst candidates. Alicia only identified one practice as integrated across 10 years and stated programs do not focus on race. The MD 715 reported only one year of data but indicated all programs are integrated. In 2015, employees did not perceive practices were integrated but did in 2016 through 2017 according to the FEVS. Alicia states they only have a Special Observances program and she has not seen any programs created for career development or recruiting for minorities.

Most SES did not integrate practices. Despite Alicia interview data being inconsistent with MD 715, it was consistent with the 2015 FEVS data when employee perception was practices were not integrated. Overall, Alicia gradually integrated practices.

### Summary of Analytic Category 3

Overall analysis indicate 14 of 18 leaders gradually integrate practices, three of 18 leaders did not identify practices, and one of 18 leaders identified one practice but there were no reports or surveys to use for a comparative analysis. Analyses indicate most EEO/diversity managers and middle managers identified and gradually integrate practices whereas less SES identified and integrate practices. Of the three levels of leaders, data does not indicate anyone reached full integration of practices.

Research suggests, instead of practices being identified as integrated or not integrated, integration may occur in stages (Junaid, Leung, Buono, 2015). Existing research suggest leaders are personally tied to the success and implementation of their programs (Kelly, Dobbin, 1998, Tilscik, 2010, Kim, Kalev, Dobbin, 2012). That explains how EEO/diversity professionals integrate equity and diversity practices. However, equity and diversity literature does not explain how middle managers have emerged in a new role as the professionals who integrate equity and diversity practices. With middle managers' emerging role of integrating practices, there are some inconsistencies between the interview data and reports/surveys.

Amongst the three levels of leaders, comparison of data for EEO/diversity manager is more consistent than middle managers and SES data. To clarify and paint a more accurate picture, the inconsistencies are mostly between practices identified during interviews and the claims made by the MD 715 data. Most, seven of eight middle managers had MD 715 reports whereas three of seven EEO/diversity managers, and one of three SES had MD 715 reports. Interview data for EEO/diversity managers is partly consistent with MD 715 and/or FEVS when reporting whether practices are integrated.

Conversely, interview data for middle managers and SES is significantly inconsistent with MD 715 and/or FEVS data. This may be due a difference between EEO/diversity managers and the middle managers and their awareness of practices. The middle manager does not work as closely with the MD 715, which identifies practices that must be adopted and integrated. This may or may not have an impact, since previous analyses indicate middle managers are responsible for integrating more practices than EEO/diversity manager, meaning middle managers should be aware of practices. It is unknown why interview data for SES is inconsistent with MD 715 and FEVS data since the executive level position should be most aware of their EEO and diversity programs and practices. Researcher suggests the MD 715 data may be symbolically integrated and not translated into practices integrated within the agencies. It is the agency head that signs the MD 715 report indicating the data is accurate. If there is symbolic integration of practices reported on the MD 715, which is submitted to Congress, then legitimacy with political constituents is attained by the agency head.

**Analytic Category 4: The Degree to Which Practices Were Integrated – Representation**

*The fourth research question sought to understand how minority representation at the SES level influenced the degree practices integrated.*

Representation at the SES level of agencies did not appear to influence the degree practices are integrated. Two (Lilly and Nadine) of 18 leaders had minority representation as agency head for five to six years. Lilly's agency minority representation at the senior level was from 2004 through 2006 and again 2016 through 2017. There were no practices integrated, according to Lilly, and the priority is the Presidential Management Fellowship. This program focuses on career progression for college students within the agency, not minority representation. Nadine's agency minority representation at the senior level was from 2012 through 2017. One practice, diversity training, was identified by Nadine as being integrated. Nadine admits adopting and integrating practices are challenging due to their specialized staffing requirements. Often, they are unable to locate qualified minority candidates to fill positions. Three of 18 leaders' agency minority representation at the senior level was for one year. Two (Lenny and Agnes) of the three leaders stated practices focused on race and reported positive working relationships with their SES when integrating practices. Lenny works closely with the SES to identify and address barriers to creating a diverse workforce, as well as creating policies to ensure the barrier does not exist the following year. Agnes describes the agency head as progressive in their approach to serve a diverse community by establishing practices to ensure their staff represents the community they serve. Based

on Lenny and Agnes, minority representation at the agency head may impact the integration of practices. Since the practices Lenny and Agnes identified as integrated existed 10 more years, minority representation at the senior level for one year may have insignificantly influenced integration. Furthermore, Nate's agency minority representation at the senior level was for one year (2017). Nate stated practices do not focus on race and that the agency made progress under the Obama Administration but progress slowed under the Trump Administration, stating EEO laws are not established in the agency.

The remaining 13 of 18 leaders' agency senior level were non minority during the period of this research (2004 through 2017). Eleven of the 13 leaders' agencies integrate practices to varying degrees, six did not focus on race while five focused on race. Isabel senior leaders are responsible for working groups, establish goals, and timelines for outcomes of equity and diversity practices. Senior leaders also establish policies and track accountability and implementation of policies. Ophelia considered the agency head as the most influential in integrating their practice, while Ingrid identifies numerous practices, similar to a hamster on a wheel, Ingrid states there is a lot of activity but no results.

#### Summary – Analytic Category 4

Whether minority or non minority representation at the senior level, practices are similarly integrated and EEO/diversity managers appeared to have little influence if the senior leaders' priorities conflicted with the EEO/diversity goals. Consistent with research, minority representation at the senior level influences the integration of practices if EEO/diversity managers have significant clout and power within their programs

(Nishii, Gotte, Raver, 2007). Perhaps if the senior level fully supports the EEO/diversity programs and those who manage the programs, this gives them clout and power. This may be exhibited by giving EEO/diversity managers adequate authority to integrate practices. Middle managers may be added to the list of those who integrate the programs. It appears in some cases middle managers are given clout and power. An example is Lenny who works closely with the agency head by identifying barriers that impact minority advancement, subsequently creating policies to correct the issues. This may be key when integrating practices to address minority representation at the SES level. The collaboration between the middle manager with clout and agency head may impact successful integration and outcomes or may result in barriers to advancement for minorities, depending on the priority of the agency head and middle manager with clout.

In summary, how the three levels of leaders integrate practices differently is influenced by multiple factors. These factors include shift in leaders' responsibility and their perception of their responsibility, shifting pressures of legal mandates, influence of established professional entity of EEO and diversity practitioners, and agencies assimilating or copying other agencies. The factors all vary in how they impact the degree leaders integrate practices. Despite the varied impact, the majority of leaders integrate practices, some more than others. While the presence of minority representation as the agency head appeared to have little or no impact.

**Revisiting Assumptions from Chapter One**

Researcher will revisit the four assumptions that were a basis of this research.

The first assumption was EEO/diversity managers' influence over the integration of practices decreased across time while SES and middle managers' influence increased.

This assumption was partly true as the three levels of leaders attributes middle managers as responsible and having the greatest influence over integrating programs. SES did not view themselves as having a great influence yet EEO/diversity and middle managers did.

SES did view EEO/diversity and middle managers as equally influential. The second assumption was amongst the three levels of leaders, the EEO/diversity managers are more likely to integrate practices than SES and middle managers. This assumption did

not hold to be true in that most leaders integrated practices to some degree. The third assumption was institutional pressures shift across time to less regulatory when influencing how leaders integrate equity and diversity programs. This assumption is

partly true. Most leaders stated practices existed due to legal mandates but normative pressure influenced the continual existence EEO and Diversity professionals and

established offices. Leaders also copied one another as practices became less focused on representation and more inclusive for all employees. Lastly, the expectation is that

minority representation at the senior level increases the adoption and integration of equity and diversity practices. This assumption did not hold to be true in that minority and non-minority representation at the SES level integrate practices similarly.

### **Summary of Interpretation of Findings**

This chapter explores how internal and external factors influence the degree leaders integrate practices to address the representation of SES. In summary, this research reveals the pressures and challenges three levels of leaders face when adopting and integrating ambiguous EEO/diversity programs using a continuously moving target. The moving targets are the shifts in responsibility, shifts in laws, agency priorities, how representation is defined, and leaders responding to those shifts. The uniqueness of this research is when analyzing who is adopting and integrating practices, it includes three levels of leaders' perception, employees' perception, and what agencies report across time. This discussion explains how leaders perceive their roles and the roles of other leaders. Based on their perceptions, leaders respond differently based on what is most popular. What is most popular is the direction the "Head" (agency head) turns. Regardless of how the SES perceive their influence over these programs, there is one influence that remains steady, their influence over their employees. Employees will give attention to what the "Head" gives attention to, and will diminish what the "Head" diminishes.

These findings have four important theoretical implications that may or may not be specifically within context of federal agencies. The first theoretical implication is coercive pressures, when are exerted, leads to more symbolic implementation. Most informants identify legal mandates as the reason they adopt and integrate practices. Further research may provide understanding of the inconsistencies between programs informants identify and those identified on reports and surveys by discussing report and survey data with informants for clarification. A second theoretical implication is despite

legal mandates researcher finds senior leaders exert substantially more influence over leaders when integrating practices. Leaders within agencies will follow whether the head agency is legally, politically, or personally influenced. Further research to include the agency head may confirm or disconfirm if agency head and the three levels of leaders are in synch when addressing SES minority representation. The third theoretical implication is when middle managers are tasked with implementing equity and diversity practices they experience the same normative pressure and resemble EEO/diversity managers. Normative, which is usually exerted on those within a network or certain professional group (e.g. EEO/diversity managers), is also exerted on middle managers' and their response is similar to those within the profession. Further research is recommended to understand how middle managers outside of the professional network may be influenced and may influence as though a part of the professional network. Research should include analysis of a larger sample size of middle managers and EEO/diversity managers within agencies to understand how similar influences (e.g. normative) lead them to integrate equity and diversity practices. The fourth and last theoretical implication is ambiguity increases, making it more difficult to address minority representation at the SES level as the number of practices that focus on representation decrease and as diversity efforts redefine representation. Further research should include a comparative analysis of previous practices that existed to address representation with the number of practices used today. Analysis would include how SES representation has increased, decreased, or remained the same during that time period. Additional research should assess how representation is being defined how it impacts the practices adopted to minority representation at the SES level. Further research may add to existing neoinstitutional

research, diversity literature, and offer greater understanding how adopting and integrating practices various practices may or may not impact minority underrepresentation in SES.

Analysis of findings was to provide a multitiered yet holistic synthesis of all data. Data analysis and data collection overlapped and were completed in tandem, which was challenging due to the extensive amount of data. The purpose was to allow emerging patterns, while reducing volume but keeping significant information to frame what the data reveal in relation to this study. Analysis of within and across case revealed similarities, differences, and unexpected relationships amongst the three levels of leaders. Albeit, there are multiple ways to interpret the data and other researchers, given the same data may report a different story. This is the story of one researcher's interpretation.

Researcher cautions that analysis of findings revealed in this research include sampling bias and a small sample of interviews from 18 leaders. Some leaders were EEO/diversity managers who are the protectors of the practices and may have responded in defense of their programs. Separating EEO managers from diversity managers may provide an interesting dynamic whereby diversity managers may protect different practices, to include practices that do not address representation. Implications drawn are from the experiences of the sample of leaders interviewed, reports, and surveys.

These implications are also drawn from a human, the researcher, which is a strength and weakness in qualitative analysis studies. The researcher is aware of the subjectivity of and biases that are interjected into this study. As a former EEO and diversity practitioner, analyzing findings was sometimes limiting. Researcher challenged assumptions and biases throughout the data collection and analysis process by journaling,

consulting with committee chair, and non EEO/diversity colleagues. This story is presented as how the researcher understands the data, connective threads, themes, and patterns.

## **Conclusions and Recommendations**

The purpose of this multicase study is to analyze, through in-depth interviews with a sample of 18 agency leaders, how shifts in both leaders' responsibilities and institutional pressures influence the integration of equity and diversity practices. Researcher supplemented interviews with reports and surveys to analyze the degree to which leaders integrated EEO and diversity practices in federal agencies and how representation of minorities at the head of agencies influenced the integration of practices.

### Overview

When federal agencies address the issue of minority representation in Senior Executive Service (SES), the degree to which leaders institutionalize diversity and equity programs is inconsistent. Before 1980, Affirmative Action Officers, Affirmative Employment Program Managers, and Equal Employment Opportunity (EEO) Managers integrated these practices. After 1980, senior and middle leadership levels were given the responsibility to integrate practices. Since the establishment of the SES position in 1979 a lot has changed while one issue remains. Minorities remain underrepresented in SES positions. This research examines how pressures influence the extent to which leaders integrate practices to address representation. From a micro level view, this research introduces a three-tier-level of leadership and how they integrate practices differently. This study seeks to contribute to neoinstitutional theory, equity and diversity literature, and representative bureaucracy by extending the perspective beyond institutional pressures on organizations.

There's clearly been a shift in institutional pressures over time in the EEO and

diversity area as well as a shift in responsibility for the implementation of these practices. This research expands upon existing literature, providing an emphasis on the micro-level approach when looking at how coercive, normative, and mimetic mechanisms influence the adoption and integration of practices. Practices move through several stages before they are integrated, not integrated, or gradually integrated. First, coercive, mimetic, and/or normative mechanisms influence practices. Next, these shifting mechanisms influence leaders' response to adopt the practices. Once adopted, three-tier-level of leaders influence whether practices are integrated, not integrated, or gradually integrated.

This qualitative case study method is used to identify how shifts in leaders' roles and institutional pressures and SES representation influence the degree practices are integrated. Leaders vary in the degree they integrate practices. Researcher used convenience and snowball sampling when selecting the 18 informants. Data collected and triangulated included interviews, reports, and surveys. The analysis identifies findings from patterns, themes, and categories. Conclusions were drawn from a comparison of literature and analysis of data.

### Overall Findings

Although researcher cannot generalize on the basis of sampling bias, these are some tentative conclusions to consider. Researcher presents ten findings from this study. The first finding of this research, using a study from Edelman et al., is middle managers and EEO/Diversity managers respond similarly when integrating practices. Regardless of leaders' position, fewer leaders, one out of 18 (6%), used the Advocate strategy compared to Edelman et al. two out of five (40%). More, 12 out of 18 (67%), used the Team Player strategy compared to Edelman et al. one out of five (20%), when integrating

practices. The second finding is legal mandates continue to influence the integration of practices yet, unlike the research of Edelman et al., a second finding reveals an effort to distance programs from race-based initiatives has increased. The third finding is pressures exerted on and brought by middle managers to integrate practices closely resemble EEO/diversity managers. Normative pressure may influence others outside of the professional network to operate within the network. Middle managers appear to operate within the professionalism of EEO/diversity managers without EEO and/or diversity related certifications, which is outside of the framework of normative pressure. Whether middle managers, EEO/diversity managers, or SES, with the exception of the middle manager employing the Advocate strategy, all leaders appear to appease the agency head regardless of institutional pressure. This fourth finding may be an indicator that senior leaders and agency heads' response to influences may have a trickle down effect on the three levels of leaders and the degree practices are integrated. Political influence, personal motivation, and other pressures may influence agency heads instead of legal mandates or copying others.

The fifth finding is middle managers are viewed by all levels of leaders as responsible for the integration of practices. When viewing which leaders adopted, implemented, maintained, and integrated practices, middle managers integrated more practices (62%) than the EEO/Diversity managers (56%). EEO/Diversity managers were responsible for adopting, implementing, and maintaining most practices while SES did not adopt, implement, maintain, or integrate any practices identified in this study.

The sixth finding is practices, as in previous research, are adopted and integrated due to legal mandates. Of the 47 practices identified by leaders in this research, 55%

exist due to coercive, 30% (EEO and diversity offices) due to combined coercive and normative, 4% due to both coercive and mimetic, 11% due to mimetic pressures.

The seventh finding is MD 715 data is inconsistent with interview data provided by leaders. Few leaders provided interview data consistent with MD 715 data. Many leaders identified two or fewer practices as integrated while their MD 715 data indicated some or most practices were integrated. Because EEO/diversity and middle level leaders are expected to adopt and implement practices, they should be aware of most practices listed in their MD 715 report. Some of these inconsistencies may be due to symbolic integration of practices.

The eighth finding from the FEVS, similar to the MD 715 data, there are inconsistencies. There was a difference between FEVS scores and interview data. FEVS scores indicated employees view their leaders as integrating equity and diversity practices whereas leaders' interview data indicate practices are gradually integrated and some not integrated at all.

The ninth finding compared interview, MD 715, and FEVS data to assess to what degree practices are integrated. Of 18 leaders with MD 715 and FEVS data (11), nine out of 11 leaders' data are inconsistent and reflect varying degrees of integration of practices. Most leaders integrate practices to some degree.

The tenth finding is minority and non minority representation at the SES level do not influence the integration or lack of integration of practices. Leaders of five out of 18 had minority representation at the SES level ranging from one to six years during the research period. Minority and non minority representation integrate practices similarly at varying degrees. Minority and non minority representation without MD 715 reporting

requirements integrate practices. Conversely, there was minority representation at the SES level whose agency had MD 715 reporting requirements but did not integrate any practices.

### Research Questions Revisited

1) How do shifts in leaders' responsibilities influence the integration of practices?

The first finding this research reveals is the shifts in leaders responsibility influence the integration of practices by all levels of leaders to some degree, mostly gradual. The role shift has impacted the degree practices are integrated in that middle managers have emerged as a significant actor. This may be good news for other disciplines outside of EEO and diversity when introducing new programs or practices. Recommend other disciplines include middle managers when introducing new initiatives. Middle managers may be a catalyst for the integration of these practices. Researcher is also aware middle managers in some agencies are rated on how they implement and support equity and diversity programs. If this perhaps increase their influence, including adoption and integration of EEO/diversity practices on performance ratings may have impacted middle managers emerging role.

The emerging middle manager may be good news for other disciplines when implementing new programs but questionable news for existing EEO/diversity managers. While EEO/diversity managers' roles are significant, their dominant influence over practices has declined and may be limited to the degree their senior level allows. Since Edelman et al.'s research there are now three levels of leaders integrating practices. More actors influencing the integration practices is helpful for EEO/diversity managers. But it also means more actors influence whether practices are integrated. Middle

managers have taken on this responsibility and EEO/diversity managers' responsibilities seem to have diminished. There may be another shift in their position similar to when diversity practitioners became the new face. Eventually, both EEO and diversity managers should be prepared to reinvent or position themselves for possible changes.

## 2) How do shifts in institutional pressures influence the integration of practices?

Findings also indicate legal mandates, or coercive mechanisms, continue to be the overall influence but often combined with normative and mimetic when practices are integrated to varying degrees. The influence of legal mandates may never go away, but it may have shifted with increased mimetic pressures. This appears to be the issue when informants identify practices and state there is less focus on race. Perhaps as more agencies shifted their focus from race when adopting and integrating practices, other agencies copied and did the same. This may be due to diversity programs that were intended to introduce inclusion and move away from representation. To remain relevant, EEO/diversity managers must find ways to increase integration of equity and diversity practices through mimetic pressure. Similar to when diversity practitioners tied the use of these practices to the increased performance organizations (Nishii, Gotte, Raver, 2007).

### Other Consideration – Managers Integrate Without Consideration for Race

Middle managers and EEO/diversity managers view their responsibility to adhere to legal mandates seemingly to the degree of their agency leader. It's interesting how managers are constrained by law but they are also constrained by their agency head or SES. As seen in the four-part typology, the degree managers integrated practices overall,

aligned with their agency leader (all strategies except the Advocate). It is difficult to ignore the timing of the establishment of the SES position in 1979 and the dismantling of Affirmative Action programs in 1981. Through attrition, new SES lead agencies with little history of Affirmative Action and its impact on underrepresented groups. The new and resounding messages to agency heads became, “You have the oversight and decide the degree equity and diversity programs are integrated”. The legal message from the courts was racial preferences of certain groups over other groups is illegal and to avoid the appearance of Affirmative Action quotas (duRivage, 1985). This message, no doubt, was passed on to middle managers and EEO/diversity managers, which perhaps also contributes to their avoidance of integrating practices that address race.

### 3) To what degree are practices integrated by three levels of leaders?

Some leaders integrated most practices, others integrated some but not all practices, and others did not integrate practices. The degree practices are integrated varies, but how do we account for the inconsistency between what the informants state is integrated and what is reported on the MD 715? Perhaps what is reported on the MD 715 is symbolic. There is little accountability for the accuracy of this report. Equity and diversity practices are ambiguous and similar to my study, the MD 715 does not emphasize the efficacy of the practices but if they have been adopted. Therefore, the MD 715 data indicating practices are mostly or somewhat integrated may be accurate, even if symbolically. Perhaps further research that includes collecting supporting data of practices listed on MD 715 may be helpful. This may address any gaps in what the informant states is integrated and what is reported to EEOC through the MD 715 as

integrated. How do we account for the inconsistency between what the informants state is integrated and what is reported on the FEVS? It may be difficult to identify why these differences occur without interviewing employees to gain a better understanding.

4) How does representation of minorities at the SES level influence the integration of practices?

Lastly, whether minority or non-minority executives led agencies, they integrated or did not integrate practices similarly. Representation has no influence on the degree practices are integrated but there is little representation to compare the degree of influence. Further research increasing the number of minority agency heads sampled would provide more data to analyze. That may not be possible because the underrepresentation of minorities at the SES level is the issue. Other factors to consider are type of agency, political environment, personal conviction, or even the influence of their EEO/diversity manager. Additional research may reveal how and if these factors influence the degree practices are integrated to address SES representation.

### Theoretical Implications and Future Research

The four theoretical implications from findings may lead to further research. These implications may or may not be specifically within context of federal agencies. The first theoretical implication is coercive pressures, when are exerted, leads to more symbolic implementation. Informants identify legal mandates as the reason they adopt and integrate practices. This finding is consistent with extant neoinstitutional research. Further research may provide understanding of the inconsistencies between programs informants identify and those identified on reports and surveys by discussing report and survey data with informants for clarification.

The second theoretical implication is senior leaders exert substantially more influence over leaders when integrating practices than institutional pressures. Leaders within agencies will follow whether the head agency is legally, politically, or personally influenced. Further research to include interviews with the agency head may confirm or disconfirm if agency head and the three levels of leaders are in synch when implementing practices to address SES minority representation. The third theoretical implication is when middle managers are tasked with implementing equity and diversity practices they experience the same normative pressure and resemble EEO/diversity managers. Normative, which is usually exerted on those within a network or certain professional group (e.g. EEO/diversity managers), is also exerted on middle managers' and their response is similar to those within the profession. Further research is recommended to understand how middle managers outside of the professional network may be influenced and may influence as though a part of the professional network. Research should include analysis of a larger sample size of middle managers and EEO/diversity managers within

agencies to understand how similar influences (e.g. normative) lead them to integrate equity and diversity practices.

The fourth and last theoretical implication is the decreasing number of practices that focus on representation and as diversity efforts redefine representation, ambiguity increases, making it more difficult to address minority representation at the SES level. Further research should include a comparative analysis of previous practices that existed to address representation with the number of practices used today. Analysis would include how SES representation has increased, decreased, or remained the same during that time period. Additional research should assess how representation is being defined how it impacts the practices adopted to minority representation at the SES level. Further research may add to existing neoinstitutional research, diversity literature, and offer greater understanding how adopting and integrating practices various practices may or may not impact minority underrepresentation in SES.

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## Appendix A

### Content Analysis – Programs, Practices, and Initiatives

Before conducting this research it was important to first identify the programs, practices, and initiatives that, through coercive, mimetic, and normative pressures, were recommended for adoption and use by agencies to address minority representation in SES by using content analysis. Content analysis is defined as any data reduction and sense-making effort that takes a volume of material and attempts to identify core consistencies and meanings (Yanow, 1996) (Berg, 2001) (Zhang, Wildemuth, 2009). Advantages to this approach were the ability to examine trends over time in recommendation of practices and ascertain general patterns of use (Yanow, 1996, Berg, 2001). Primary data were documents from a seventeen year period (Appendix B), 1994 - 2011 which included two studies conducted for the federal government, 4 GAO reports, 4 Executive Orders, Senate and House Reports, and Committee Hearings, and 4 documents categorized as “other” for a total of 14 documents. Data included information from the Library of Congress, Federal Government websites for Office of Personnel Management, Government Accounting Office, Equal Employment Opportunity Commission, and studies found online. Using thematic analysis, every reference to a practice was identified with corresponding justification, if given, for use of that practice which may reveal the influence of coercive, mimetic or normative mechanisms (DiMaggio, Powell, 1983). This analysis included an evaluation of the convergence of frameworks across time which was critical during this analysis because there were practices discussed in one time frame that were not discussed in other timeframes (Yanow, 1996, Zhang, Wildemuth, 2009). For example, establishing a diversity and inclusion office was not in

the conversation prior to the implementation of Executive Order 13583 in 2011 (EO 13583, 2011). This EO reflected an unparalleled commitment to diversity from the current Administration (Berg, 2001, Patton, 2002, EO 13583, 2011).

### **Coding Process**

The coding scheme was designed to capture references to programs, practices, and initiatives recommended specifically to address the underrepresentation of minorities in SES positions. The following coding scheme was used (Appendix C): 1-Plans, 2-Targeted Recruitment & Hiring Efforts, 3-D&I office, 4-Task Force/Committee, 5-Legislation/Executive Order, 6-Conduct new study (e.g., survey) about the problem, 7-Workforce and Succession Planning Strategies, 8-Monitor Applicant/Promotion Hiring Ratio, 9-Performance Management Measurement/Accountability System (targeted to managers for working to promote a diverse and inclusive workforce), 10 - Mentoring/development, 11-Organizational time/resources, 12-Put on social gatherings, 13-Strengthen HR/employment practices in general (no specific reference made to recruitment, selection, development, etc.), 14- Leadership commitment, 15-Increased Oversight/Advisement, 16-Onboarding.

First, as stated earlier, 14 documents met the criteria for inclusion and were targeted for coding by myself and another researcher, Stephen Young, an outside expert with a Ph.D. in Industrial/Organizational Psychology. The unit of analysis was paragraph coded thematically. This decision was made given that certain documents (e.g., Senate reports) could cause higher word counts to result for certain practices due to oratory convention and speaker verbosity rather than true practice prevalence. Often, within the

same Senate or House Report, there were references to the same programs repeatedly by the same policymaker; these were counted once. If this were not done, the word count would not accurately represent a particular program's widespread selection in such cases. A code was used (see Appendix C) each time a practice was referenced and a requisite justification (if applicable) was given in a document. Additionally, this rule allowed for the same practice to be referenced multiple times in a document. However, a practice would only be counted a second time if either a different justification was given for the practice or if the practice represented a sub-category of the primary practice. If a practice was not referenced, it was not count based on implied or personal interpretation (Berg, 2001).

Second, a preliminary coding structure was created based on the documents under study using the constant comparative method. The constant comparative method is an inductive approach that involves reviewing the study's documents in detail, resulting in the formation of provisional categories or first order categories of practices (Weber, 1990) (Berg, 2001). This set of categories were reviewed and refined to reflect a mutually exclusive set of program categories. To ensure the consistency of coding among raters, a coding manual was created consisting of category names, definitions, and examples (Weber, 1990, Berg, 2001).

Third, the raters independently coded approximately one-third of the 14 articles under review using the following variables: Programs, year, person/agency referenced within document, and program justification. To determine if one program was selected more often than other programs, the raters identified how often programs were selected. The year of each document (or year referenced in within document) was identified to

determine if there was convergence over time for certain programs. During the initial coding of the documents, the raters agreed on 12 of 44 total codes put forth between both individually for an inter-rater agreement index of 27%.

There were a couple of reasons the inter-rater agreement was 27%. First, the documents often referenced programs without specific references to SES. The raters verified and agreed the focus of this content analysis was coding programs selected or recommended in reference to SES minority representation. Second, given that there was no agreed upon rule for determining how particular units were coded, discrepancies were discussed and changed to reflect 100% agreement based on clarification of the coding rules (Yanow, 1996, Berg, 2001). The coding manual was slightly adjusted to reflect one change to the program type variable such that two categories “Targeted Recruitment Efforts” and “Hire More Minorities” were combined to reflect one category “Targeted Recruitment and Hiring Efforts”.

The raters proceeded to code remaining documents individually to minimize but not eliminate researcher subjectivity in interpreting content (Yanow, 1996). The remaining documents resulted in 100% inter-rater agreement. During this process, one additional category was added and cited as “Onboarding” since it became apparent that instances of this category could not be absorbed into the original set of codes. As a last step, the contents were analyzed to make sense of the themes identified (Bradley, 1993) (Yanow, 1996, Berg, 2001). This involved exploring the dimensions of the categories and identifying relationships between categories and/or variables (Bradley, 1993, Berg, 2001).

**Results**

The practice most often identified or mentioned in the documents was workforce and succession planning strategies. The practices are listed in order of prevalence. To avoid using an excessive number of practices in this research, three practices were selected based on prevalence. The following influences were mentioned in the documents as justifications of why certain practices were recommended: private or public sector best practices, Representative Bureaucracy, social responsibility/justice, performance, and/or better problem solving. Out of the 128 practices coded, only 22 (17%) identified a justification for selection of that practice and 106 practices coded were not linked to a justification. Practices did not show a convergence across time. Practices that were recommended or selected over the 17 years of content did not show an increase, decrease, or concentrated use during any time period.

## Appendix B

### Documents by Date

<i>Document Title</i>	<i>Date</i>
HRM09-Reinventing Human Resource Management	9/1994
Federal Civilian Employment Affirmative Action	1995
EO 13171	10/12/2000
GAO-03-34	1/2003
GAO 04-123t Enhance Diversity in SES 2003	10/15/2003
GAO-08-609T	4/3/2008
HR 3774	6/4/2008
Senate Report 110-517	10/1/2008
Diversity SES Excel Conference-GAO 09-110-HR2721 2009(Senate 1180)	2009
HR 2721	6/4/2009
OMB OPM Memo - Senior Executive Service Initiative	2/18/2011
Hearing on Strengthening the Senior Executive Service- Subcommittee Session	3/29/2011
A Better, More Diverse SES 2050 Study	9/2011
OPM Strategic Plan	11/2011

## Appendix C

### Coding Scheme of Programs, Practices, and Initiatives

- 1-Plans
- 2-Targeted Recruitment & Hiring Efforts
- 3-D&I office, 4-Task Force/Committee
- 5-Legislation/Executive Orders
- 6-Conduct new study (e.g., survey) about the problem
- 7-Workforce and Succession Planning Strategies
- 8-Monitor Applicant/Promotion Hiring Ratio
- 9-Performance Management Measurement/Accountability System (targeted to managers for working to promote a diverse and inclusive workforce)
- 10 -Mentoring/development
- 11-Organizational time/resources
- 12-Put on social gatherings
- 13-Strengthen HR/employment practices in general (no specific reference made to recruitment, selection, development, etc.
- 14- Leadership commitment
- 15-Increased Oversight/Advisement
- 16-Onboarding

## Appendix D

### IRB Approval Letter



**Office of Research Compliance**  
 Institutional Review Board  
 North End Center, Suite 4120, Virginia Tech  
 300 Turner Street NW  
 Blacksburg, Virginia 24061  
 540/231-4606 Fax 540/231-0959  
 email [irb@vt.edu](mailto:irb@vt.edu)  
 website <http://www.irb.vt.edu>

#### MEMORANDUM

**DATE:** February 6, 2018  
**TO:** Matthew Martin Dull, Melvene A Lanier  
**FROM:** Virginia Tech Institutional Review Board (FWA00000572, expires January 29, 2021)  
**PROTOCOL TITLE:** A Comparative Analysis of Federal Agencies' Equity and Diversity Programs Addressing Minority Representation in Senior Executive Service  
**IRB NUMBER:** 17-752

Effective February 6, 2018, the Virginia Tech Institutional Review Board (IRB) approved the Amendment request for the above-mentioned research protocol.

This approval provides permission to begin the human subject activities outlined in the IRB-approved protocol and supporting documents.

Plans to deviate from the approved protocol and/or supporting documents must be submitted to the IRB as an amendment request and approved by the IRB prior to the implementation of any changes, regardless of how minor, except where necessary to eliminate apparent immediate hazards to the subjects. Report within 5 business days to the IRB any injuries or other unanticipated or adverse events involving risks or harms to human research subjects or others.

All investigators (listed above) are required to comply with the researcher requirements outlined at: <http://www.irb.vt.edu/pages/responsibilities.htm>

(Please review responsibilities before the commencement of your research.)

#### PROTOCOL INFORMATION:

Approved As: **Expedited, under 45 CFR 46.110 category(ies) 5,7**  
 Protocol Approval Date: **August 15, 2017**  
 Protocol Expiration Date: **August 14, 2018**  
 Continuing Review Due Date\*: **July 31, 2018**

\*Date a Continuing Review application is due to the IRB office if human subject activities covered under this protocol, including data analysis, are to continue beyond the Protocol Expiration Date.

#### FEDERALLY FUNDED RESEARCH REQUIREMENTS:

Per federal regulations, 45 CFR 46.103(f), the IRB is required to compare all federally funded grant proposals/work statements to the IRB protocol(s) which cover the human research activities included in the proposal / work statement before funds are released. Note that this requirement does not apply to Exempt and Interim IRB protocols, or grants for which VT is not the primary awardee.

The table on the following page indicates whether grant proposals are related to this IRB protocol, and which of the listed proposals, if any, have been compared to this IRB protocol, if required.

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## Appendix E

### RESEARCH INTERVIEW QUESTIONS

*I am conducting an interview on the use of equity and diversity practices to address Minority Underrepresentation in Senior Executive Service Positions as a part of research dissertation for a Virginia Tech PhD program.*

*This is an official interview and results will only be used in research of the dissertation topic. I will ensure confidentiality is maintained in the completion, process, and analysis of this interview. We do not require names of Interview Respondents and agencies will be identified. During the interview, the term “Minorities” is used. Minorities, for the sake of this interview, are defined as:*

**Definition of Minorities:** African-American, Hispanic/Latino, American Indian/Native American, Asian, Pacific Islander

**Definition of Non-Minorities:** Caucasian Females and Males

**Definition of Representation:** Representation of Minorities

If I use terminology you are unfamiliar with, please request I clarify, define, or explain.

The Dissertation Topic Is:

A Comparative Analysis of Federal Agencies’ Equity and Diversity Practices Addressing Minority Representation in Senior Executive Service

---

### QUESTIONS

1. What is your position title?

2. How many years have you worked in this position?

0 – 3 yrs

4 – 7 yrs

8+ yrs

3. Is your office responsible for SES minority representation for this agency (includes feeder groups of GS 14 and 15)?

Yes

No

4. Are multiple offices responsible for SES representation for this agency?

Yes            No

If the response to #4 is yes, what other offices are responsible for SES representation?

If the response to #4 is no, go to question #5

5. What programs do you have that addresses minority representation?

List programs:

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6. What programs were implemented due to legal mandates?

List programs:

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7. What programs were implemented as a best practice from other organization or know practice?

List programs:

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8. What offices or jobs were created to implement equity and diversity programs?

List programs:

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9. What office/s **introduced** the programs?

Senior leaders            Branch/Department lead            EEO and Diversity

List of programs and responses:  
(e.g. Mentoring – Branch/Department lead)

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---

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10. What office/s **implemented** the programs?

Senior leaders      Branch/Department lead      EEO and Diversity

List of programs and responses:

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11. What office/s **maintains** the programs?

Senior leaders      Branch/Department lead      EEO and Diversity

List of programs and responses:

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12. What office had/has the **greatest influence** in implementing the programs?

Senior leaders      Branch/Department lead      EEO and Diversity

List of programs and responses:

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13. How did the office/s influence implementation of the Programs?

List of programs and responses:

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14. How many years has each program existed?

0 – 2 yrs      3 – 5 yrs      6 – 9 yrs      10 + yrs

List of programs and responses:

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15. If the program is no longer used or has been replaced, enter:

1-Date ended\_\_\_\_\_

2-Date of replacement practice (if applicable)\_\_\_\_\_

3-Replacement practice (if applicable)\_\_\_\_\_

*Thank you for participating in this interview. Your time is greatly appreciated.*

## Appendix F

### Management Directive 715 and Federal Employee Viewpoint Survey

#### Management Directive 715 (EEOC Website)

The MD 715 “provides policy guidance and standards for establishing and maintaining effective affirmative programs of equal employment opportunity. Equal Employment Opportunity Management Directive 715 (MD-715), issued October 1, 2003, established standards for ensuring that agencies develop and maintain model EEO programs. These standards are used to measure and report on the status of the federal government’s efforts to become a model employer”. The responsibility of EEOC is to review and evaluate the operation of all agency’s EEO programs (MD 715 Annual Report).

#### 2017 Federal Employee Viewpoint Survey Methods (OPM Website)

The Federal Employee Viewpoint Survey (FEVS) measures employees’ perceptions of conditions within their agencies, which contribute to their organization’s success. The survey allows government employees to share their opinions about what matters most to them, and gives them the opportunity to let their leadership know how they feel about their job, their supervisor, and their agency. OPM and agency managers use these indicators in developing policy and planning actions to improve agency performance and evaluate individual agencies’ progress towards long-term goals. Federal employees have an intimate knowledge of the workings of the government at every level. The FEVS gives them the voice they need to point out inefficiencies and jobs well done. Senior managers can then use this information to make government more effective, and more responsive to the needs of the American people. Reports are offered to help managers at agency and sub agency levels, resulting in a greater potential to celebrate successes and identify opportunities for change across each agency.

#### Survey Items

The 98-item survey includes 84 items that measure Federal employees’ perceptions about how effectively agencies manage their workforce, as well as 14 demographic questions. The survey is grouped into eight topic areas: (1) Personal Work Experiences, (2) Work Unit, (3) Agency, (4) Supervisor, (5) Leadership, (6) Satisfaction, (7) Work/Life Programs, and (8) Demographics.

#### Who Participated?

Full-time and part-time, permanent, non-seasonal employees were eligible to participate in the survey. A total of 80 agencies (37 departments/large agencies and 43 small/independent agencies) participated in this year’s survey. Of the 1,068,151 employees who received the FEVS, 486,105 completed the survey for a governmentwide response rate of 45.5 percent.

**How Was the Survey Administered?**

The survey was a self-administered Web survey.

**When Were Employees Surveyed?**

Agency launch dates were organized in two waves this year, with approximately 6-week administration periods beginning May 2nd and May 9th.

**Data Weighting**

Data collected from the 2017 survey respondents were weighted to produce survey estimates that accurately represent the survey population. Unweighted data could produce biased estimates of population statistics. The weights developed for the 2017 FEVS take into account the variable probabilities of selection across the sample domains, nonresponse, and known demographic characteristics of the survey population. Thus, the final data set reflects the agency composition and demographic makeup of the Federal workforce within plus or minus 1 percentage point.

**Data Analysis**

In performing statistical analyses for this report, OPM employed a number of grouping procedures to simplify presentations. Most of the items had six response categories: Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree, and No Basis to Judge/Do Not Know. In some instances, these responses are collapsed into one positive category (Strongly Agree and Agree), one negative category (Strongly Disagree and Disagree), and a neutral category (Neither Agree nor Disagree). We conducted analyses on all survey items for the various agencies. Responses of Do Not Know/No Basis to Judge were removed before calculation of percentages. More detailed survey statistics are available in the published Federal Employee Viewpoint Survey Data volumes for this survey and can be downloaded from OPM's Federal Employee Viewpoint Survey website: [www.opm.gov/FEVS](http://www.opm.gov/FEVS).

## Appendix G

### Definition of Terms (EEOC website)

#### Title VII

Title VII prohibits discrimination based on race, color, religion, sex, or national origin. It also prohibits reprisal or retaliation for participating in the discrimination complaints process or for opposing any unlawful employment practice under Title VII.

#### Special Observances

Special observances were designed for the purpose of providing cultural awareness to everyone. Commemorative activities conducted for these observances should be educational and employment-related. Observances celebrate the birthday of Dr. Martin Luther King Jr.; African American Heritage; Women's History; Lesbian, Gay, Bisexual and Transgender (LGBT) equal rights; Asian Pacific Americans; Women's Equality Day; Hispanic Americans; People with Disabilities; and American Indian/Alaskan Native Heritage.

#### Special Emphasis

Special Emphasis Programs (SEP) are an integral part of the Equal Employment Opportunity and Civil Rights Program. The purpose of these programs is to ensure that agencies take affirmative steps to provide equal opportunity to minorities, women and people with disabilities in all areas of employment. The term, "Special Emphasis Programs," refers specifically to employment related programs which focus special attention on groups that are conspicuously absent or underrepresented in a specific occupational category or grade level in the agency's work force. These programs serve as a channel to management officials. The goals of the Special Emphasis Programs are to:

- Improve employment and advancement opportunities for minorities, women and people with disabilities in the Federal service;
- Identify systemic causes of discrimination against minorities, women and people with disabilities;
- Seek ways to help minorities, women and people with disabilities to advance by using their skills more fully;
- Monitor agency progress in eliminating discrimination and adverse impact on minorities, women and people with disabilities in employment and agency programs; and
- Educate Federal employees and managers about the extent of various forms of discrimination within the Federal Service.

### Prohibited Practices

Under the laws enforced by EEOC, it is illegal to discriminate against someone (applicant or employee) because of that person's race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age (40 or older), disability or genetic information. It is also illegal to retaliate against a person because he or she complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

The law forbids discrimination in every aspect of employment (recruitment, job assignments, promotions, discipline, pay, benefits, etc.)

## Appendix H

### SES Selection Process (OPM website)

Senior Executive Service Candidate Development Programs (SESCDPs) are OPM-approved training programs designed to develop the executive qualifications of employees with strong executive potential to qualify them for and authorize their initial career appointment to the SES.

Candidate Development Programs (CDPs) address the five Executive Core Qualifications (ECQs) that embody the leadership skills needed to succeed in the SES.

These skills apply to all SES positions and are in addition to the technical qualifications that agencies specify for particular positions. OPM's Guide to Senior Executive Service Qualifications describes these leadership skills (competencies) and the behaviors associated with the ECQs.

#### EXECUTIVE CORE QUALIFICATIONS (ECQS)

The Fed CDP complements Federal agency strategic human capital management and leadership development initiatives and is based on the five ECQs for SES entry. The ECQs describe the leadership skills needed to succeed in the SES.

#### Fundamental Competencies:

- Continual Learning
- Integrity/Honesty
- Interpersonal Skills
- Oral Communication
- Public Service Motivation
- Written Communication

#### ECQ 1: Leading Change

- Creativity/Innovation
- External Awareness
- Flexibility
- Resilience
- Strategic Thinking
- Vision

#### ECQ 2: Leading People

- Conflict Management
- Developing Others
- Leveraging Diversity
- Team Building

## ECQ 3: Results-Driven

- Accountability
- Customer Service
- Decisiveness
- Entrepreneurship
- Problem Solving
- Technical Credibility

## ECQ 4: Business Acumen

- Financial Management
- Human Capital Management
- Technology Management

## ECQ 5: Building Coalitions

- Influencing/Negotiating
- Partnering
- Political Savvy

Typically, CDPs are 18-24 months and are open to GS-14s/15s or employees at equivalent levels from within or outside the Federal Government.

Agencies use merit staffing procedures to select participants for their CDPs.

Most CDP vacancies are announced Government-wide.

After certification by an OPM-administered Qualification Review Board (QRB) CDP graduates, who competed at least government wide, are eligible for noncompetitive career appointment to any SES position for which they meet the professional/technical qualifications requirements. (Note that QRB certification does not guarantee placement in the SES.)

CDPs must include the following items required by 5 CFR 412.302(c):

- An Individual Development Plan (IDP), based on individual needs and competencies;
- At least 80 hours of formal training that addresses the ECQs and includes individuals from outside the candidate's agency;
- At least 4 months of developmental assignments outside the candidate's position of record; and
- An SES mentor.

## Appendix I

### Shifts in Leaders' Responsibilities

Table 4 Shifts in Leaders' Responsibilities Influence Integration of Practices  
Practices Identified by the Three Levels of Leaders

<b>Shifts in Leaders' Responsibilities Influence Integration of Practices (# is interview question)</b>						
<b>Case</b>		<b>#9-Introd Practice Y-Yes N- No S-Shared Responsibility</b>	<b>#10-Implem Practice Y-Yes N- No S-Shared Responsibility</b>	<b>#11-Maintain Prac Y-Yes N- No S-Shared Responsibility</b>	<b>#12-Most Influence Y-Yes N- No S-Shared Responsibility</b>	<b>Comments EEO/Div offices are not included as a practice in Table 4</b>
<b>EEO/DIV LEVEL LEADERS</b>						
<b>Isabel</b>						
	1-Barrier Analysis Wkg Gp	S	S	N	N	
	2-EEO Training	Y	Y	Y	Y	
	3-Climate Assessment	S	S	Y	S	
<b>Alex</b>						
	1-Special Observances	N	Y	Y	Y	
	2-EEO Training	Y	Y	Y	Y	
	3-MD 715	Y	Y	Y	Y	
<b>Ophelia</b>						
	1-Special Emphasis	N	N	Y	N	
	2-Training	N	N	Y	N	
	3-Diversity Councils	N	N	Y	N	
	4-MD 715	N	N	Y	N	
<b>Stan</b>						
	1-EEO Training	Y	Y	Y	Y	
	2-Climate Assessment	Y	Y	Y	Y	
	3-Customized Training	Y	Y	Y	Y	
<b>Ingrid</b>						
	1-Training	Y	Y	Y	Y	
	2-MD 715 Working Group	Y	Y	Y	Y	
	3-Special Observances	N	N	Y	N	
<b>Lilly</b>						
	No Programs			Prog req't but has not been adopted or implemented		
<b>Camille</b>						
	1-Training	N	N	N	N	
	2-Special	N	N	N	N	

	Emphasis Prog					
Totals	18 Practices Identified	56% (10 of 18) of practices introduced by EEO/Div leaders (incl shared resp).  7SL/3ML  73% (8 of 11) existed over 10 yrs	61% (11 of 18) of practices implemented by EEO/Div leaders (incl shared resp).  6SL/3ML  75% existed over 10 yrs	83% (15 of 18) of practices maintained by EEO/Div leaders (incl shared resp).  3SL  81% (13 of 16) existed over 10 yrs	56% (10 of 18) of practices influenced most by EEO/Div leaders (incl shared resp). 9SL  82% (9 of 11) existed over 10 yrs	Of the practices identified, some responsibilities (e.g. introduced, implemented, etc.) were shared by one or more leaders.
<b>MIDDLE MANAGER LEVEL LEADERS</b>						
<b>Dean</b>						
	1-Training	N	N	N	N	
<b>Lenny</b>						
	1-Target Recruiting	Y	Y	Y	N	
	2-EEO Training	N	N	N	Y	
	3-MD 715	N	N	N	Y	
	4-Succession Planning	Y	Y	Y	N	
<b>Jose</b>						
	1-Training	N	N	N	N	No dedicated EEO/Div office but representative
<b>Agnes</b>						
	1-Training	S	S	N	S	
	2-FEVS Analysis	N	N	N	N	
	3-Affinity Groups	S	S	S	S	
<b>Willa</b>						
	1-Training	Y	Y	N	Y	
<b>Nate</b>						
	1-Special Observances	Y	Y	Y	Y	
<b>Alena</b>						
	1-Training	N	N	S	S	
	2-Special Observances	N	N	S	S	
<b>Sergio</b>						
	N/A	N/A	N/A	N/A	N/A	Over 20 yrs with agency-no prog
Totals	13 Practices Identified	46% (6 of 13) of practices introduced by MM leaders (incl shared resp).  5EEO/4SL	46% (6 of 13) of practices implemented by MM leaders (incl shared resp).  4EEO/4SL	46% (6 of 13) of practices maintained by MM leaders (incl shared resp).  9EEO/1SL	62% (8 of 13) of practices influenced most by MM leaders (incl shared resp).  6EEO/4SL	Of the practices identified, some responsibilities (e.g. introduced, implemented, etc.) were shared by one or more

		67% (4 of 6) existed over 10 yrs	71% (5 of 7) existed over 10 yrs	67% (4 of 6) existed over 10 yrs	100% (8 of 8) existed over 10 yrs	leaders.
<b>SENIOR LEVEL LEADERS</b>						
Nadine						
	1-Diversity Training	N	N	N	N	No dedicated EEO/Div office, HR function
Alicia						
	1-Special Emphasis Prog	N	N	N	N	
Mitch						
	N/A	N/A	N/A	N/A	N/A	No programs to address minority rep
Totals	2 Practices Identified	0% of practices introduced by Senior leaders (incl shared resp)  1EEO/1MM	0% of practices implemented by Senior leaders (incl shared resp)  1EEO/1MM	0% of practices maintained by Senior leaders (incl shared resp)  1EEO/1MM	0%  1EEO/1MM	Of the practices identified, some responsibili- ties (e.g. introduced, implemented, etc.) were shared by one or more leaders.

### **Practices Identified by EEO and Diversity Level Leaders**

Isabel identified three practices: Barrier Analysis Working Group, EEO training, and climate assessments. Of the three practices, Isabel adopted and implemented all practices. Isabel maintained and had the most influence over integrating two out of three practices.

Alex identified three practices: Special Observances, EEO training, and MD 715. Of the three practices, Alex adopted and implemented two out of three practices. Alex maintained and had the most influence over integrating all practices.

Ophelia identified four practices: Special Emphasis, training, diversity councils, and MD 715. Of the four practices, Ophelia was not involved in adopting or implementing any of the practices. Ophelia maintained all practices but did not have the most influence over integrating all practices.

Stan identified three practices: EEO training, climate assessment, and customized training. Stan adopted, implemented, and maintained all practices and had the most influence over integrating all practices.

Ingrid identified three practices: training, MD 715 Working Group, and Special Observances. Of the three practices, Ingrid adopted and implemented two out of three practices. Ingrid maintained all practices and had the most influence over integrating the two out of three practices.

Lilly did not identify any existing practices.

Camille identified two practices: training and Special Emphasis Programs. Camille did not adopt, implement, maintain, or have the most influence over integrating the practices.

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### **Practices Identified by Middle Manager Level Leaders**

Dean identified one practice, training. Dean did not adopt, implement, maintain, or have the most influence over integrating the practices.

Lenny identified four practices: target recruiting, EEO training, MD 715, and succession planning. Lenny adopted, implemented, maintained, and had the most influence over integrating two out of four practices.

Jose identified one practice, training. Jose did not adopt, implement, maintain, or have the most influence over integrating the practice.

Agnes identified three practices: training, Federal Employee Viewpoint Survey Analysis, and Affinity Groups. Agnes was involved in adopting and implementing two out of three practices. Agnes maintained one out of three practices and had the most influence over integrating the two out of three practices.

Willa identified one practice, training. Willa adopted and implemented but did not maintain the practice. Willa had the most influence over integrating the practice.

Nate identified one practice, Special Observances. Nate adopted, implemented, maintained, and had the most influence over integrating the practice.

Alena identified two practices: training and Special Observances. Alena was not involved in adopting or implementing practices but maintained and had the most influence over integrating the practice.

Sergio was unable to identify any practices.

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### **Practices Identified by Senior Level Leaders**

Nadine identified one practice, diversity training. Nadine did not adopt, implement, maintain, or have the most influence over integrating the practice.

Alicia identified one practice, Special Emphasis Programs. Alicia did not adopt, implement, maintain, or have the most influence over integrating the practice.

Mitch was unable to identify any practices.

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## Appendix J

## Institutional Pressures Influence Integration of Practices

Table 5 Institutional Pressures Influence Integration of Practices  
Institutional Pressures Identified by the Three Levels of Leaders

<b>Institutional Pressures Influence Integration of Practices (# is interview question)</b>				
<b>Case</b>	<b>#5-Programs and Dedicated EEO/Div Ofc</b>	<b>#6-C-Coercive #7-M-Mimetic #8-N-Normative</b>	<b>#14-Years Prog Exist 5+ years-integrated</b>	<b>Comments</b>
<b>EEO/DIV LEVEL LEADERS</b>				
<b>Isabel</b>				
	1-Barrier Analysis Wkg Gp	C/M	0-2 yrs	
	2-EEO Training	C	10+ yrs	
	3-Climate Assessment	C	10+ yrs	
	4-EEO/Div Ofc	N	10+ yrs	
<b>Alex</b>				
	1-Special Observances	C	10+ yrs	
	2-EEO Training	C	10+ yrs	
	3-MD 715	C	10+ yrs	
	4-EEO/Div Ofc	N	10+ yrs	
<b>Ophelia</b>				
	1-Special Emphasis	C	10+ yrs	
	2-Training	C	10+ yrs	
	3-Diversity Councils	M	10+ yrs	
	4-MD 715	C	10+ yrs	
	5-EEO/Div Ofc	N	10+ yrs	
<b>Stan</b>				
	1-EEO Training	C	10+ yrs	
	2-Climate Assessment	C	10+ yrs	
	3-Customized Training	M	10+ yrs	
	4-EEO Ofc only	N	10+ yrs	
<b>Ingrid</b>				
	1-Training	C	10 + yrs	
	2-MD 715 Working Group	C/M	2 - 3 yrs	
	3-Special Observances	C	4 yrs	
	4-EEO/Div Ofc	N	10+ yrs	
<b>Lilly</b>				
	2-EEO/Div Ofc	N	10 + yrs	
<b>Camille</b>				
	1-Training	C	10 + yrs	
	2-Special Emphasis Prog	C	10 + yrs	
	3-EEO/Div Ofc	N	10 + yrs	
Sub total	18 Practices 7 EEO/Div Ofcs = 25 Prac	14-C/2-CM/ 2-M /7N	22-10+ yrs 3-0-4 yrs	
<b>MIDDLE MANAGER LEVEL LEADERS</b>				
<b>Dean</b>				
	1-Training	C	10 + yrs	
	2-EEO/Div Ofc	N	10 + yrs	
<b>Lenny</b>				
	1-Target Recruiting	M	1 yr	
	2-EEO Training	C	10 + yrs	
	3-MD 715	C	10 + yrs	

	4-Succession Planning	M	1 yr	
	5-EEO/Div Ofc	N	10 + yrs	
<b>Jose</b>				
	1-Training	C	10 + yrs	No dedicated EEO/Div office but representative
<b>Agnes</b>				
	1-Training	C	10 + yrs	
	2-FEVS Analysis	M	10 + yrs	
	3-Affinity Groups	C	10 + yrs	
	4-EEO/Div Ofc	N	10 + yrs	
<b>Willa</b>				
	1-Training	C	10 + yrs	
	2-EEO/Div Ofc	N	10 + yrs	
<b>Nate</b>				
	1-Special Observances	C	10 + yrs	
	2-EEO/Div Ofc	N	10 + yrs	
<b>Alena</b>				
	1-Training	C	10 + yrs	
	2-Special Observances	C	10 + yrs	
	3-EEO/Div Ofc	N	10 + yrs	
<b>Sergio</b>				
	n/a	n/a	n/a	Over 20 yrs with agency-no prog
Sub total	13 Practices 6 EEO/Div Ofcs = 19 Prac	10-C/6-N/3-M	17-10+ yrs 2 - 1 yr	
<b>SENIOR LEVEL LEADERS</b>				
<b>Nadine</b>				
	1-Diversity Training	C	6 - 9 yrs	No dedicated EEO/Div office, HR function
<b>Alicia</b>				
	1-Special Emphasis Prog	C	10 + yrs	
	2-EEO/Div Ofc	N	10 + yrs	
<b>Mitch</b>				
	n/a	n/a	n/a	No programs to address minority rep
Sub total	2 Practices 1EEO/Div Ofc = 3 Prac	2-C/1-N	2-10+ yrs 1- 6-9 yrs	
<b>TOTALS</b>				
	33 Practices	26 - Coercive	41 - 10+ yrs	
	14 EEO Offices	2 - Coer/Mim	1 - 6-9 yrs	
	47 Practices total	5 - Mimetic	5 - 0-4 yrs	
		14 - Normative		

## **Practices and Pressures Identified by EEO and Diversity Level Leaders**

### EEO and Diversity Level Leader

Isabel has an EEO/Diversity office and identified three practices: Barrier Analysis Working Group, EEO training, and climate assessments. All practices were influenced by legal mandates but the Barrier Analysis Working Group was influenced by mimetic

pressure also included elements that went beyond the required mandate and became a best practice used by other agencies. Of the three practices, two existed for 10 or more years, which is considered integrated and one existed between zero to two years.

Alex has an EEO/Diversity office and identified three practices: Special Observances, EEO training, and MD 715. All practices were influenced by legal mandates and existed for 10 or more years, which is considered integrated.

Ophelia has an EEO/Diversity office and identified four practices: Special Emphasis, training, diversity councils, and MD 715. Three practices were influenced by legal mandates and the diversity council was influenced by mimetic pressure. It was adopted from both government and private sector best practices. All practices existed for 10 or more years, which is considered integrated.

Stan has an EEO/Diversity office and identified three practices: EEO training, climate assessment, and customized training. Two practices were influenced by legal mandates and the customized training was influenced by mimetic pressure. This training was adopted from another agency. All practices existed for 10 or more years, which is considered integrated.

Ingrid has an EEO/Diversity office and identified three practices: training, MD 715 Working Group, and Special Observances. All practices were influenced by legal mandates but the MD 715 Working Group also included elements that went beyond the required mandate and became a best practice used by other agencies. Two practices existed for 10 or more years, which is considered integrated, two practices existed for four or less years.

Lilly has an EEO/Diversity office but has not adopted any practices.

Camille has an EEO/Diversity office and identified two practices: training and Special Emphasis Programs, which were influenced by legal mandates. Both practices existed for 10 or more years, which is considered integrated.

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### **Practices and Pressures Identified by Middle Manager Level Leaders**

#### Middle Manager Level Leader

Dean has an EEO/Diversity office and identified one practice, training, which was influenced by legal mandates. The practice existed for 10 or more years, which is considered integrated.

Lenny has an EEO/Diversity office and identified four practices: target recruiting, EEO training, MD 715, and succession planning. Two practices were influenced by legal mandates. Two practices, target recruiting and succession planning, included elements that went beyond the required mandate and became a best practice used by other

agencies. Those practices have existed for one year. The other two practices existed for 10 or more years, which are considered integrated.

Jose does not have an EEO/Diversity office but there is an EEO representative to assist with EEO programs. One program was identified, training, which was influenced by legal mandates. The practice existed for 10 or more years, which is considered integrated.

Agnes has an EEO/Diversity office and identified three practices: training, Federal Employee Viewpoint Survey Analysis, and Affinity Groups. Two practices were influenced by legal mandates. One practice, Federal Employee Viewpoint Survey Analysis, is an initiative created by the agency and may be identified as influenced by mimetic pressure. All practices existed for 10 or more years, which is considered integrated.

Willa has an EEO/Diversity office and identified one practice, training, which was influenced by legal mandates. The practice existed for 10 or more years, which is considered integrated.

Nate has an EEO/Diversity office and identified one practice, Special Observances, which was influenced by legal mandates. The practice existed for 10 or more years, which is considered integrated.

Alena has an EEO/Diversity office and identified two practices: training and Special Observances, which were influenced by legal mandates. Both practices existed for 10 or more years, which is considered integrated.

Sergio does not have an EEO/Diversity office and was unable to identify any practices.

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### **Practices and Pressures Identified by Senior Level Leaders**

#### Senior Level Leader

Nadine does not have a dedicated EEO/Diversity office. This is a part of the Human Resources Office function. One practice was identified, diversity training, which was influenced by legal mandates. The practice existed between 6 to 9 years, which is considered integrated.

Alicia has an EEO/Diversity office and identified one practice, Special Emphasis Programs, which was influenced by legal mandates. The practice existed for 10 or more years, which is considered integrated.

Mitch does not have an EEO/Diversity office and was unable to identify any practices.

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## Appendix K

### Practices Integrated Across Time – MD 715

Table 6 MD 715 Sections B and E – Practices Integrated Across Time

<b>MD 715 – Practices integrated across time (Section B and E)</b>			
<b>Case</b>	<b>MD 715 Section B</b>	<b>MD 715 Section E</b>	<b>Integrated</b>
	Integration of Programs into Agency Mission	Evaluate Impact and Effectiveness of EEO Programs	
<b>EEO/DIV LEVEL LEADERS</b>			
<b>Isabel</b>			
No Report			
<b>Alex</b>			
No Report			
Required			
<b>Ophelia</b>			
FY2012-2017	Agency began rpt in FY2012. FY2012-2017 EEO Officials are not present during deliberations prior to decisions on recruitment strategies, succession planning selections for career development, and other workforce changes. FY2012-2017 EEO Directors do not report directly to agency head. Insufficient resources allocated to EEO Program for self assessment and analysis according to MD715 requirements.	Agency began rpt in FY2012. FY2012-2017 inadequate staffing to complete analysis required by MD715	Most but not all programs integrated
<b>Stan</b>			
No Report			
<b>Ingrid</b>			
FY2004-2017	FY2004 EEO Officials do not have the knowledge, skills, and abilities to carry out the duties and responsibilities of their duties. FY2004, 2013 EEO Officials are not present during deliberations prior to decisions on recruitment strategies, succession planning, selections for career development, and other workforce changes. FY 2004-2006 policies and practices not examined regularly to identify impediments to equality for employees and applicants. FY2004-2008 EEO Director does not have authority or funding to ensure implementation of EEO action plans to improve EEO Program	FY2004-2006, 2015, 2016, 2017 has not implemented an adequate data collection and analysis systems to track information required by MD715. FY 2005-2006 inadequate staffing to complete analysis required by MD715.	Most but not all programs integrated

efficiency and eliminate barriers. FY2013 EEO Officials not included in strategic planning.

**Lilly**

Unable to access report

**Camille**

FY2012-2017	Agency began rpt in FY2012. FY2012-2017 EEO Officials are not present during deliberations prior to decisions on recruitment strategies, succession planning, selections for career development, and other workforce changes. FY2012-2017 EEO Directors do not report directly to agency head. Insufficient resources allocated to EEO Program for self assessment and analysis according to MD715 requirements.	Agency began rpt in FY2012. FY2012-2017 inadequate staffing to complete analysis required by MD715	Some but not all programs integrated
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**MIDDLE MANAGER LEVEL LEADERS**

**Dean**

FY2008-2016	FY2009-2010, 2016 insufficient resources to conduct barrier analysis, to include data collection and tracking systems. FY2016 EEO Directors does not report directly to agency head. FY2009-2010 EEO officials do not have the knowledge, skills, and abilities to carry out duties and responsibilities of their position. FY2010 EEO Director does not have regular official means to inform agency head and other top officials of effectiveness, efficiency, and legal compliance of EEO Program.	FY2008-2009 has not implemented an adequate data collection and analysis systems to track information required by MD715. FY2009-2010, 2016 EEO staff inadequate training and experience to conduct barrier analysis as required by MD715.	Most but not all programs integrated
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**Lenny**

FY2016	Yes	Yes	One year data
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**Jose**

FY2006,07,09,11	FY2004-2005, 2008, 2010, 2012-2015 no rpt. FY 2006-2007 insufficient resources to conduct barrier analysis, to include data collection and tracking systems (training budget reduced due to other priorities). FY2006-2007, 2009 State of the Agency's EEO Program not presented to agency head.	FY2004-2005, 2008, 2010, 2012-2015 no rpt. FY2006-2007 had not implemented an adequate data collection and analysis systems to track information required by MD715.	Most programs integrated
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**Agnes**

FY2014	FY2004-2013, 2016-2017	Yes	One year data
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no rpt. FY2014 policies and practices not examined regularly to identify impediments to equality for employees and applicants.

<b>Willa</b>			
FY2004-2017	FY2004 EEO Officials do not have the knowledge, skills, and abilities to carry out the duties and responsibilities of their duties. FY2004, 2013 EEO Officials are not present during deliberations prior to decisions on recruitment strategies, succession planning, selections for career development, and other workforce changes. FY 2004-2006 policies and practices not examined regularly to identify impediments to equality for employees and applicants. FY2004-2008 EEO Director does not have authority or funding to ensure implementation of EEO action plans to improve EEO Program efficiency and eliminate barriers. FY2013 EEO Officials not included in strategic planning.	FY2004-2006, 2015, 2016, 2017 has not implemented an adequate data collection and analysis systems to track information required by MD715. FY 2005-2006 inadequate staffing to complete analysis required by MD715.	Most but not all programs integrated
<b>Nate</b>			
FY2016	Yes	Yes	One year data
<b>Alena</b>			
FY2008-2016	FY2009-2010, 2016 insufficient resources to conduct barrier analysis, to include data collection and tracking systems. FY2016 EEO Directors does not report directly to agency head. FY2009-2010 EEO officials do not have the knowledge, skills, and abilities to carry out duties and responsibilities of their position. FY2010 EEO Director does not have regular official means to inform agency head and other top officials of effectiveness, efficiency, and legal compliance of EEO Program.	FY2008-2009 has not implemented an adequate data collection and analysis systems to track information required by MD715. FY2009-2010, 2016 EEO staff inadequate training and experience to conduct barrier analysis as required by MD715.	Most but not all programs integrated
<b>Sergio</b>			
No Report Required			
<b>SENIOR LEVEL LEADERS</b>			
<b>Nadine</b>			
No Report Required			

Alicia			
FY2014	Yes	Yes	One year data
Mitch			

No Report  
Required

<sup>3</sup>MD 715 reports

<sup>4</sup>No Report Required

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<sup>3</sup> MD 715 reports are available for the general public but some agencies moved reports from their public website to “employee access” websites. Other agencies removed their reports from both internet and intranet. Following numerous efforts to access or get copies of MD 715 reports through EEO and Diversity employees, EEOC websites, interviewees, and/or agency websites, researcher was able to access reports for some but not all leaders’ agencies.

<sup>4</sup> No report was required for some agencies due to agency size or not an agency requirement.

## Appendix L

### Degree Practices Integrated – MD 715

Table 7 Degree Practices are Integrated

<b>MD 715 - Degree practices are integrated based on agency reports (Sections A, C, D)</b>			
<b>Case</b>	<b>MD 715 Section A</b>	<b>MD 715 Section C</b>	<b>MD 715 Section D</b>
	Demonstrated Commitment from Agency Leadership	Manager and Supervisor Accountability	Self Assessment of Workforce Demographics
<b>EEO/DIV LEVEL LEADERS</b>			
<b>Isabel</b>			
No Report			
<b>Alex</b>			
No Report Required			
<b>Ophelia</b>			
FY2012-2017	Yes	Yes	Yes
<b>Stan</b>			
No Report			
<b>Ingrid</b>			
FY2004-2017	Yes	FY2004-2006 no process established to review if systemic barriers impeded representation from all groups. FY2007-2017 process established.	FY2004-2006 no analysis conducted to identify and remove barriers to employment. FY2007-2017 analysis conducted.
<b>Lilly</b>			
Unable to access report			
<b>Camille</b>			
FY2012-2017	Yes	Yes	Yes
<b>MIDDLE MANAGER LEVEL LEADERS</b>			
<b>Dean</b>			
FY2008-2016	Yes	FY2008-2016 no process established to review if systemic barriers impeded representation from all groups. FY2009-2010 EEO program officials did not advise, provide assistance, status of mgrs/spv's of EEO programs. FY2013-2014 did not explore whether disciplinary actions should be taken when findings of discrimination.	FY2008-2010 no analysis to identify and remove barriers to employment, which includes: senior leaders meet with or assist EEO reps to identify impeding barriers to EEO and develop and implement plans to eliminate barriers. Also senior managers do not incorporate EEO plan into agency strategic plan. FY2011-2016 analysis to identify and remove barriers to employment and senior managers incorporate EEO plan into agency strategic plan.
<b>Lenny</b>			
FY2016	Yes	Yes	Yes
<b>Jose</b>			
FY2006,07,09,11	Yes	FY2006 process not established to review systemic barriers that may	Yes

impede training opportunities for all groups. Mgrs/spv not disciplined or sanctioned when findings of discrimination. FY2007, 2009, 2015 process established to review systemic barriers. Mgrs/spv not disciplined or sanctioned when findings of discrimination.

<b>Agnes</b>			
FY2014	Yes	Yes	FY2014 no analysis of workforce grade level distribution conducted.
<b>Willa</b>			
FY2004-2017	Yes	FY2004-2006 no process established to review if systemic barriers impeded representation from all groups. FY2007-2017 process established.	FY2004-2006 analysis to identify and remove barriers to employment not conducted. FY2007-2017 analysis conducted.
<b>Nate</b>			
FY2016	Yes	Yes	Yes
<b>Alena</b>			
FY2008-2016	Yes	FY2008-2016 no process established to review if systemic barriers impeded representation from all groups. FY2009-2010 EEO program officials do not advise, provide assistance, status of mgrs/spv's of EEO programs. FY2013-2014 does not explore whether disciplinary actions should be taken when findings of discrimination.	FY2008-2010 no analysis to identify and remove barriers to employment, which includes: senior leaders meet with or assist EEO reps to identify impeding barriers to EEO and develop and implement plans to eliminate barriers. Also senior managers do not incorporate EEO plan into agency strategic plan. FY2011-2016 analysis to identify and remove barriers to employment and senior managers incorporate EEO plan into agency strategic plan.
<b>Sergio</b>			
No Report Required			
<b>SENIOR LEVEL LEADERS</b>			
<b>Nadine</b>			
No Report Required			
<b>Alicia</b>			
FY2014	Yes	Yes	Yes
<b>Mitch</b>			
No Report Required			

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### EEO and Diversity Level Leaders

Isabel – Due to the size of the agency, there was no report required. The agency had multiple sub agencies and was not required to combine sub agency reports to create one agency report.

Alex – There was no report required due to the size of the agency or federal requirement.

Ophelia – Agency reported data from FY 2012 through 2016. In Sections B and E, EEO agency leaders reported EEO officials were not present during deliberations before decisions on recruitment strategies, succession planning selections for career development, and other workforce changes. EEO Directors did not report directly to agency head. There were insufficient resources allocated to EEO Programs for self-assessment and analysis in accordance with MD715 requirements and inadequate staffing to complete analysis required by MD715. During FY 2012 through 2016, agency leaders reported they sustained practices across time in Sections A, C, and D. Based on Sections B and E data, there were many deficiencies indicating the agency did not integrate programs. Yet the data from Sections A, C, and D indicate commitment and accountability from agency leaders and middle managers. These sections also indicate agency head ensured there are systems to evaluate program effectiveness.

Report indicates some but not all programs are integrated. The results from this report appeared inconsistent in that there was commitment from agency leader yet EEO officials were not present during deliberations for critical workforce changes. EEO Director did not report to the agency head, which was a structural requirement that gave EEO direct access to the agency head. There was inadequate EEO staffing to assess and analyze the efficacy of programs.

Stan - Due to the size of the agency, there was no report required. The agency had multiple sub agencies and was not required to combine sub agency reports to create one agency report.

Ingrid - Agency reported data from FY 2004 through 2017. In Sections B and E, FY 2004 and 2013 EEO officials were not present during deliberations prior to decisions on recruitment strategies, succession planning, selections for career development, and other workforce changes. During FY 2013 EEO Officials were not included in strategic planning. FY 2004 through 2006, 2015, 2016, 2017, agency did not implement an adequate data collection and analysis systems to track information as required by MD715. Agency leaders reported in Section A from FY 2004 through 2017, practices were sustained across time. Agency leaders reported in Section C, FY 2004 through 2006 there were no processes established to review if systemic barriers impeded representation. Agency leaders reported in Section D, FY 2004 through 2006 there was no analysis conducted to identify and remove barriers to employment. From FY 2007 through 2017, agency leaders reported Section C and D practices were sustained across time.

Reports indicated most, but not all programs are integrated. In FY 2004 and 2013, EEO officials were not present during critical workforce changes and not included in strategic planning. This seemed to have been corrected from FY 2014 through 2017. Although processes to identify and remove barriers were not adopted from FY 2004 through 2006, processes were adopted and implemented from FY 2007 through 2017. Data collection and analysis systems to track information were not an integrated practice.

Lilly – Researcher could not access report.

Camille - Agency reported data from FY 2012 through 2016. In Sections B and E, EEO agency leaders reported EEO officials were not present during deliberations prior to decisions on recruitment strategies, succession planning selections for career development, and other workforce changes. EEO Directors did not report directly to agency head. There were insufficient resources allocated to EEO Programs for self-assessment and analysis in accordance with MD715 requirements and inadequate staffing to complete analysis required by MD715. During FY 2012 through 2016, agency leaders reported practices were sustained across time in Sections A, C, and D. Based on Sections B and E data, there were many deficiencies indicating programs were not integrated. Yet the data from Sections A, C, and D indicate commitment and accountability from agency leaders and middle managers. These sections also indicate agency head ensured there are systems to evaluate program effectiveness.

Report indicates some but not all programs are integrated. The results from this report appeared inconsistent in that there was commitment from agency leader yet EEO officials were not present during deliberations for critical workforce changes. EEO Director did not report to the agency head, which was a structural requirement that gave EEO direct access to the agency head. There was inadequate EEO staffing to assess and analyze the efficacy of programs.

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#### Middle Manager Level Leader

Dean - Agency reported data from FY 2008 through 2016. In FY 2009 through 2010, and 2016, agency leaders reported in Sections B and E there were insufficient resources to conduct barrier analysis, to include data collection and tracking systems. In FY 2016, the EEO Director did not report directly to agency head. In FY 2009 through 2010, and 2016 EEO staff possessed inadequate training and inexperience to conduct barrier analysis as required by MD 715. Agency leaders reported in Section A from FY 2008 through 2016, practices were sustained across time. Agency leaders reported in Section C, FY 2008 through 2016 there were no processes established to review if systemic barriers impeded representation. From FY 2009 through 2010, EEO program officials did not advise managers/supervisors, provide assistance to managers/supervisors, or provide status to managers/supervisor's of EEO programs. Agency leaders reported in Section D, FY 2013 through 2014 leaders did not explore whether disciplinary actions should be taken when there were findings of discrimination. From FY 2015 through 2016, agency leaders reported Section D practices were sustained across time.

Report indicates most but not all programs are integrated. Results from this report indicated programs that appeared to be integrated were no longer integrated and programs not integrated became integrated. From FY 2008 through 2015 the EEO Director reported to the agency head but not in FY 2016. In FY 2009 and 2010 EEO staff lacked training and experience to conduct barrier analysis and there was insufficient staffing to conduct analysis. The agency corrected these issues from FY 2011 through 2015, but they became an issue again in FY 2016. Also in FY 2009 through 2010, EEO officials did not advise managers and supervisors but this was corrected FY 2011 through 2016. In FY 2013 through 2014, there was an issue of addressing discrimination but was corrected in FY 2015 through 2016. However, the agency never established processes to assess if systemic barriers impeded representation.

Lenny - Agency reported data for FY 2016. In Sections B and E, agency leader reported EEO was integrated into the agency's strategic missions. Agency head ensured there were effective systems implemented to evaluate the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process. Agency leaders reported practices were sustained in FY 2016 in Sections A, C, and D.

Results from this report indicated practices are integrated.

Jose - Agency reported data for FY 2006, 2007, 2009, and 2011. Agency leaders reported in Sections B and E, FY 2006, 2007, 2009 State of the Agency's EEO Program was not presented to agency head. Section A and D FY 2006, 2007, 2009, and 2011, practices were sustained across time. Agency leaders reported in Section C FY 2006, agency did not establish processes to review systemic barriers that may impede training opportunities for all groups. Agency leaders reported FY 2006, 2007, 2009, and 2011, managers/supervisors were not disciplined or sanctioned when there were findings of discrimination.

Report indicates most programs are integrated. Results from this report indicated two practices were not integrated, EEO program was not presented to agency head and supervisors and managers were not disciplined when there were findings of discrimination. They integrated the remaining programs.

Agnes - Agency reported data for FY 2014. Agency leaders reported in Section B FY 2014 policies and practices were not examined regularly to identify impediments to equality for employees and applicants. Agency head ensured there were effective systems implemented to evaluate the impact and effectiveness of the agency's EEO Programs and an efficient and fair dispute resolution process. Agency leaders reported practices were sustained in FY 2014 in Sections A and C. Agency leaders reported in Section D FY 2014, there was no analysis of workforce grade level distribution conducted. They integrated the remaining programs.

Report indicates most programs are integrated. Results from this report indicated two practices were not integrated, policies and practices were not examined to identify barriers to equality and there was no analysis of workforce grade level distribution.

Willa - Agency reported data from FY 2004 through 2017. In Sections B and E, FY 2004 and 2013 EEO officials were not present during deliberations prior to decisions on recruitment strategies, succession planning, selections for career development, and other workforce changes. During FY 2013 EEO Officials were not included in strategic planning. FY 2004 through 2006, 2015, 2016, 2017 an adequate data collection and analysis systems to track information had not been implemented as required by MD715. Agency leaders reported in Section A from FY 2004 through 2017, practices were sustained across time. Agency leaders reported in Section C, FY 2004 through 2006 there were no processes established to review if systemic barriers impeded representation. Agency leaders reported in Section D, FY 2004 through 2006 there was no analysis conducted to identify and remove barriers to employment. From FY 2007 through 2017, agency leaders reported Section C and D practices were sustained across time.

Reports indicated most, but not all programs are integrated. In FY 2004 and 2013, EEO officials were not present during critical workforce changes and not included in strategic planning. This seemed to have been corrected from FY 2014 through 2017. Although processes to identify and remove barriers were not implemented FY 2004 through 2006, processes were implemented from FY 2007 through 2017. Data collection and analysis systems to track information were not an integrated practice.

Nate - Agency reported data for FY 2016. In Sections B and E, agency leader reported EEO was integrated into the agency's strategic missions. Agency head ensured there were effective systems implemented to evaluate the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process. Agency leaders reported practices were sustained in FY 2016 in Sections A, C, and D.

Results from this report indicated practices are integrated.

Alena - Agency reported data from FY 2008 through 2016. In FY 2009 through 2010, and 2016, agency leaders reported in Sections B and E there were insufficient resources to conduct barrier analysis, to include data collection and tracking systems. In FY 2016, the EEO Director did not report directly to agency head. In FY 2009 through 2010, and 2016 EEO staff possessed inadequate training and inexperience to conduct barrier analysis as required by MD 715. Agency leaders reported in Section A from FY 2008 through 2016, practices were sustained across time. Agency leaders reported in Section C, FY 2008 through 2016 there were no processes established to review if systemic barriers impeded representation. From FY 2009 through 2010, EEO program officials did not advise managers/supervisors, provide assistance to managers/supervisors, or provide status to managers/supervisor's of EEO programs. Agency leaders reported in Section D, FY 2013 through 2014 leaders did not explore whether disciplinary actions should be taken when there were findings of discrimination. From FY 2015 through 2016, agency leaders reported Section D practices were sustained across time.

Report indicates most but not all programs are integrated. Results from this report indicated programs that appeared to be integrated were no longer integrated and programs

not integrated became integrated. From FY 2008 through 2015 the EEO Director reported to the agency head but not in FY 2016. In FY 2009 and 2010 EEO staff lacked training and experience to conduct barrier analysis and there was insufficient staffing to conduct analysis. The agency corrected these issues from FY 2011 through 2015, but they became an issue again in FY 2016. Also in FY 2009 through 2010, EEO officials did not advise managers and supervisors but this was corrected FY 2011 through 2016. In FY 2013 through 2014, there was an issue of addressing discrimination but was corrected in FY 2015 through 2016. However, the agency never established processes to assess if systemic barriers impeded representation.

Sergio - There was no report required due to the size of the agency or federal requirement.

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Senior Level Leader

Nadine - There was no report required due to the size of the agency or federal requirement.

Alicia - Agency reported data for FY 2014. Agency leaders reported in Sections B and E that EEO was integrated into the agency's strategic missions. Agency head ensured there were effective systems implemented to evaluate the impact and effectiveness of the agency's EEO Programs as well as an efficient and fair dispute resolution process. Agency sustained practices in FY 2014 in Sections A, C, and D.

Results from this report indicated practices are integrated.

Mitch - There was no report required due to the size of the agency or federal requirement.

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## Appendix M

### Degree Practices Integrated – FEVS

Table 8 FEVS Degree Practices Are Integrated

FEVS 2008-2017 - Degree practices are integrated based on agency surveys				
2015-2017 Best Places to Work in Support of Diversity 1-Lower Quartile (0-25%) 2-Below Median (25-50%) 3-Above Median (50-75%) 4-Uppoeer Quartile (75-100%)			*Of the 18 leaders, researcher used agency data for nine leaders from sub agencies because their individual sub agency data was not available.	
<b>Case</b>	<b>#34-Policies and programs promote diversity in the workplace.</b> Note: No FEVS in 2009	<b>#38-Prohibited Personnel Practices are not tolerated.</b> Note: No FEVS in 2009	<b>#45-My supervisor is committed to a workforce representative of all segments of society.</b> Note: No FEVS in 2009	<b>#55-Supervisors work well with employees of different backgrounds.</b> Note: No FEVS in 2009
EEO/DIV LEVEL LEADERS				
<b>Isabel</b>				
Agency Score: 2015-Above Median 55-59% 2016-Above Median +1% 2017-Above Median +2%	In 2008 over 60% agreed but the response rates dropped significantly (by 6%) in 2010 and declined through 2014 remaining over 50%. From 2015-2017 response rates of those who agreed increased, remaining over 50%. In 2008 response rates for those who disagreed was about 10% but increased in 2010 and remained between 12 and 14% through 2016 and decreased slightly to 11% 2017. From 2008-2013 response rates for those who neither agreed nor disagreed increased from over 20% to over 30% and declined from 2015-2017 with rates over 20%.	2008-2015 response rates of those who agreed remained steady over 60% with an increase to over 70% in 2017. From 2008-2014 response rates of those who disagreed remained between 19-20% and began to decline from 2015-2017 from 18% to 17%. In 2008 response rates for those who neither agreed nor disagreed decreased slightly and remained between 18-20% until 2017 when it decreased to 17%.	This question was not included in the 2008 survey. In 2010-2011 response rates of those who agreed was over 60% and remained steady until 2012-2013 when it declined slightly. From 2015-2016 response rates of those who agreed slightly increased and increased to over 70% in 2017. From 2009-2016 response rates of those who disagreed remained 9-10% and decreased to 8% in 2017. From 2010-2013 response rates of those who neither agreed nor disagreed remained between 24 and 25% but decreased from 2014-2017 down to 21% in 2017.	2008-2015 response rates of those who agreed declined from 68% steadily (remaining over 60%) and increased 2016-2017 to over 70%. From 2008-2013 response rates of those who disagreed increased from 11-13% and declined 2014 and remained steady at 12% through 2016 then declined in 2017 to 10%. In 2008 response rates of those who neither agreed or disagreed was at 20% and slightly increased to remain between 21 and 22% until 2015 when response rates decreased and in 2017 decreased to 18%.
<b>Alex – *Agency data</b>				
Agency Score: 2015-2016 – N/A 2017-Above Median 55-59%				
<b>Ophelia – *Agency data</b>				
Agency Score: 2015-Above Median				

50-54%  
2016-Above Median  
+8%  
2017-Above Median  
+1%

#### Stan

Agency Score: Agency Score: 2015-Above Median 55-59% 2016-Above Median +1% 2017-Above Median +2%	In 2008 over 60% agreed but the response rates dropped significantly (by 6%) in 2010 and declined through 2014 remaining over 50%. From 2015-2017 response rates increased but remained over 50%. In 2008 response rates for those who disagreed was about 10% but increased in 2010 and remained between 12 and 14% through 2016 and decreased slightly to 11% 2017. From 2008-2013 increased from over 20% to over 30% and declined from 2015-2017 with rates over 20%.	2008-2015 response rates of those who agreed remained steady over 60% with an increase to over 70% in 2017. From 2008-2014 response rates of those who disagreed remained between 19-20% and began to decline from 2015-2017 from 18% to 17%. In 2008 response rates for those who neither agreed nor disagreed decreased slightly and remained between 18-20% until 2017 when it decreased to 17%.	This question was not included in the 2008 survey. In 2010-2011 response rates of those who agreed was over 60% and remained steady until 2012-2013 when it declined slightly. From 2015-2016 response rates slightly increased and increased to over 70% in 2017. From 2009-2016 response rates of those who disagreed remained 9-10% and decreased to 8% in 2017. From 2010-2013 response rates of those who neither agreed nor disagreed remained between 24 and 25% but decreased from 2014-2017 down to 21% in 2017.	2008-2015 response rates of those who agreed declined from 68% steadily (remaining over 60%) and increased 2016-2017 to over 70%. From 2008-2013 response rates of those who disagreed increased from 11-13% and declined 2014 and remained steady at 12% through 2016 then declined in 2017 to 10%. In 2008 response rates of those who neither agreed or disagreed was at 20% and slightly increased to remain between 21 and 22% until 2015 when response rates decreased and in 2017 decreased to 18%.
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#### Ingrid – \*Agency data

Agency Score:  
2015-Above Median  
60-64%  
2016-Above Median  
+3%  
2017-Above Median  
+3%

#### Lilly

Agency Score: 2015-Above Median 50-54% 2016-Above Median +3% 2017-Above Median +4%	In 2008 response rates of those who agreed was over 50% but dropped significantly (8%) in 2010 to over 40%. From 2010-2015 response rates remained between 48-50%. In 2016-2017 response rates increased to just over	2008-2014 response rates of those who agreed was over 60% but dropped to over 50% in 2015. Response rates returned to over 60% 2016-2017. In 2008 response rates of those who disagreed was at 14% but experienced a steady	This question was not included in the 2008 survey. From 2010-2017 response rates of those who agreed showed no pattern of increase or decrease but rates remained between 65-70%.	In 2008 response rates of those who agreed was over 60% but dropped by 5% in 2010. In 2011 response rates increased by 4% but began to decline through 2015 the response rates were 10% less than in 2011.
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50%. In 2008 response rates of those who disagreed was 14% but increased and remained between 18-20% from 2010-2017. In 2008 response rates of those who neither agreed nor disagreed was 28% but increased from 2010-2015 in the range of 30-33%. In 2016 response rates returned to over 20% with a slight increase in 2017.	increase until 2015 when it reached over 20%. In 2016-2017 response rates declined by 4%. From 2008-2013 response rates for those who neither agreed nor disagreed declined from over 20% to 20%. 2014-2015 response rates slightly increased but declined by 4% in 2016 and increased by 4% in 2017.	From 2009-2017 response rates of those who disagreed remained around 11% and showed an increase in 2015 but returned to 11% in 2016-2017. 2010-2017 response rates for those who neither agreed nor disagreed decreased gradually from over 20% to under 20% in 2017.	In 2016 response rates rose slightly but increased by over 8% in 2017. In 2008 response rates of those who disagreed increased from 12% by 4% and was up and down by 1 to 3% from 2010-2017. From 2008-2014 response rates of those who neither agreed nor disagreed increased and decreased slightly between 21 and 22%. In 2015 response rates increased by 4% but slightly decreased in 2016 and decreased by almost 5% in 2017.
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**Camille – \*Agency data**

Agency Score:  
 2015-Above Median  
 50-54%  
 2016-Above Median  
 +8%  
 2017-Above Median  
 +1%

**MIDDLE  
 MANAGER LEVEL  
 LEADERS**

**Dean**

Agency Score: 2015-Above Median 55-59% 2016-Above Median +1% 2017-Above Median +3%	In 2008 response rates of those who agreed were over 60% but declined in subsequent years. In 2012 response rates were under 60% and slightly inclined from 2015-2017 to just over 60%. Response rates in 2008 of those who disagreed increased from under 10% and remained over 11 and 12% from 2010-2017. Response rates in 2008 of those who neither agreed nor disagreed was at	In 2008 response rates of those who agreed were at 67% and increased gradually from 2010-2013. There was a slight decrease 2014-2015 before the rates increased again and were over 70% in 2017. Response rates of those who disagreed remained between 11 and 12% from 2008-2016 and decreased to under 11% in 2017. Response rates of those who neither agreed nor disagreed	This question was not included in the 2008 survey. In 2010 response rates of those who agreed remained at 65% with a slight decrease in 2014. Response rates increased steadily through 2017 to over 70%. Response rates of those who disagreed fluctuated between 7 and 9% from 2010-2017. Response rates of those who	In 2008 response rates of those who agreed were at 69% but fluctuated from 2010-2015. Response rates rose in 2016 and to over 70% in 2017. Response rates of those who disagreed fluctuated between 9 and 11% from 2010-2016 and decreased to under 9% in 2017. Response rates of those who neither
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<p>25% but increased in subsequent years to reach 29% in 2013-2014. Rates gradually declined to between 26 and 27% from 2015-2017.</p>	<p>fluctuated in 2008-2013 between 19 and 20%. Rates declined to 16% in 2017.</p>	<p>neither agreed nor disagreed remained between 25 and 26% from 2010-2013. In 2014 response rates declined steadily in subsequent years to under 22% 2017.</p>	<p>agreed nor disagreed fluctuated between 20 and 22% from 2008-2016 but dropped to 18% in 2017.</p>
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#### Lenny - \*Agency data

Agency Score:  
 2015-Above Median  
 55-59%  
 2016-Above Median  
 +2%  
 2017-Above Median  
 +4%

#### Jose

<p>Agency Score:        2015-Above Median        50-54%        2016-Above Median        +1%        2017-Above Median        +4%</p>	<p>In 2008 response rates of those who agreed were over 60%. In 2010 response rates declined by sharply by 7% and continued to from 2010-2014 when the rate dropped to 51%. In 2015-2017 the rates increased but remained under 60% in 2017. Response rates for those who disagreed from 2008-2014 fluctuated between 10 -13% but increased by in 2015-2016 to 17%. Response rates dropped to 14% in 2017. Response rates of those who neither agreed or disagreed in 2008 was 25% but increased by 5% in 2010. From 2011-2015 response rates fluctuated between 30-31% and declined to under 30% 2016-2017.</p>	<p>In 2008 response rates of those who agreed were between 66 and 65% until 2012. Response rates in 2013-14 dropped by 4% and began a gradual increase from 2015-2016 with a significant increase by 5% to 69% in 2017. Response rates of those who disagreed fluctuated between 11 and 13% from 2008-2011. In 2012 response rates gradually increased through 2016 then decreased by 4% in 2017 to 12%. Response rates of those who neither agreed nor disagreed fluctuated from 2008-2015 between 20-22% but declined in 2016 to 18% and remained steady in 2017.</p>	<p>This question was not included in the 2008 survey. In 2010 response rates of those who agreed increased sharply from 60 to 67% in 2011. From 2012-2016 response rates fluctuated between 63 and 65% and increased to 68% in 2017. Response rates of those who disagreed remained between 9 and 11% from 2010-2015. Response rates increased slightly in 2016 to 12% and decreased slightly to 10% in 2017. Response rates of those who neither agreed nor disagreed remained steady between 25 and 26% from 2010-2013 with a slight gradual decrease from 2014-2017 to 21% in 2017.</p>	<p>In 2008 response rates of those who agreed was 69% and began to decline down to 62% by 2013 where it remained steady through 2015. In 2016 responses rates rose slightly and in 2017 rose significantly by 6% to 69%. Response rates of those who disagreed remained steady at 11% from 2008-2011 and increased in 2012 and 2013. Response rates remained steady at 14% and increased slightly in 2016 and decreased in 2017 to 11%. Response rates of those who neither agreed nor disagreed in 2008 increased from 18% to 21% in 2010 and remained steady through 2012. In 2013 response rates increased slightly and remained steady at 23% through</p>
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2015 then decreased slightly in 2016. In 2017 response rates decreased to 19%.

#### Agnes - \*Agency data

Agency Score:  
2015-Above Median  
60-64%  
2016-Above Median  
+3%  
2017-Above Median  
+3%

#### Willa - \*Agency data

Agency Score:  
2015-Above Median  
60-64%  
2016-Above Median  
+3%  
2017-Above Median  
+3%

#### Nate - \*Agency data

Agency Score:  
2015-Above Median  
55-59%  
2016-Above Median  
+2%  
2017-Above Median  
+4%

#### Alena

<p>Agency Score: 2015-Above Median 55-59% 2016-Above Median +1% 2017-Above Median +3%</p>	<p>In 2008 response rates of those who agreed were over 60% but declined in subsequent years. In 2012 response rates were under 60% and slightly increased from 2015-2017 to just over 60%. Response rates in 2008 of those who disagreed increased from under 10% and remained over 11 and 12% from 2010-2017. Response rates in 2008 of those who neither agreed nor disagreed was at 25% but increased in subsequent years to reach 29% in 2013-2014. Rates gradually declined to between 26 and 27% from 2015-2017.</p>	<p>In 2008 response rates of those who agreed were at 67% and increased gradually from 2010-2013. There was a slight decrease 2014-2015 before the rates increased again and were over 70% in 2017. Response rates of those who disagreed remained between 11 and 12% from 2008-2016 and decreased to under 11% in 2017. Response rates of those who neither agreed nor disagreed fluctuated in 2008-2013 between 19 and 20%. Rates declined to 16% in 2017.</p>	<p>This question was not included in the 2008 survey. In 2010 response rates of those who agreed remained at 65% with a slight decrease in 2014. Response rates increased steadily through 2017 to over 70%. Response rates of those who disagreed fluctuated between 7 and 9% from 2010-2017. Response rates of those who neither agreed nor disagreed remained between 25 and 26% from 2010-2013. In 2014 response rates declined steadily in subsequent years to under 22% 2017.</p>	<p>In 2008 response rates of those who agreed were at 69% but fluctuated from 2010-2015. Response rates rose in 2016 and to over 70% in 2017. Response rates of those who disagreed fluctuated between 9 and 11% from 2010-2016 and decreased to under 9% in 2017. Response rates of those who neither agreed nor disagreed fluctuated between 20 and 22% from 2008-2016 but dropped to 18% in 2017.</p>
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#### Sergio

No report required

**SENIOR LEVEL**

**LEADERS**

Nadine

No report

Alicia - \*Agency data

Agency Score:

2015-Below Median

45-49%

2016-Below Median

-1%

2017-Above Median

+3%

Mitch

No report required

## Appendix N

## Combined Data: Interviews, Reports, and Surveys

Table 9 Combined Data - Degree Practices Integrated

<b>Combined Data: Interviews, Reports, and Surveys</b>				
<b>Case</b>	<b>Consistencies and Inconsistencies</b>	<b>Practices Integrated (Interview Data)</b>	<b>MD 715</b>	<b>FEVS Note: No FEVS in 2009</b>
<b>EEO/DIV LEVEL LEADERS</b>				
<b>Isabel</b>				
Inconsistent	Interview with leader indicated two practices integrated. Survey index score indicate practices integrated.	1-EEO Training 2-Climate Assessment	No report req'd	2008-2017-Above median <b>Some but not all programs integrated</b>
<b>Alex</b>				
Consistent	Interview with leader indicated three practices integrated. Survey index score indicate practices integrated.	1-Special Observances 2-EEO Training 3-MD 715 (data from parent agency)	No report req'd	2017-Above median One year of data <b>Some but not all programs integrated</b>
<b>Ophelia</b>				
Consistent	MD 715 indicated practices gradually integrated. Interview with leader indicated practices were integrated. Survey index score indicate practices integrated.	1-Special Emphasis 2-Training 3-Diversity Councils 4-MD 715	Rpt 2012-2016 <b>Some but not all programs integrated</b>	2015-2017-Above median
<b>Stan</b>				
Consistent	Interview with leader indicated four practices integrated. Survey index score indicate practices integrated.	1-EEO Training 2-Climate Assessment 3-Customized Training	No report req'd	2008-2017-Above median <b>Some but not all programs integrated</b>
<b>Ingrid</b>				
Inconsistent	MD 715 indicated practices integrated. Interview with leader indicated one practice (training) integrated. Survey index score indicate practices integrated.	1-Training	Rpt 2004-2017 2004-2006 practices not integrated. 2007-2017 <b>Most but not all programs integrated</b>	2015-2017-Above median
<b>Lilly</b>				
Unable to do comparison	Interview with leader indicated no practices integrated.	No Programs	No report	2008-2017-Above median

Survey index score indicate practices integrated.

Camille				
Inconsistent	Interview inconsistent with MD 715 report, indicated practices gradually integrated.	1-Training 2-Special Emphasis Prog	Rept 2012-2016 <b>Some but not all programs integrated</b>	2015-2017-Above median
Prog offered at field of but not confirmed if used. Prog not offered at HQ where leader works	Survey index score indicate practices integrated.			
MIDDLE MANAGER LEVEL LEADERS				
Dean				
Inconsistent	MD 715 indicated most practices integrated in 2011-2016. Interview with leader indicated one practice integrated. Survey index score indicate practices integrated.	1-Training	Rpt 2008-2016 Fluctuation of practices integrated. Most practices integrated. In 2016 some practices no longer integrated. Practices not integrated before 2011 were integrated 2011-2016. <b>Most but not all programs integrated</b>	2008-2017-Above median
Programs do not focus on race				
Lenny				
Inconsistent	MD 715 data for one year indicated practices integrated. Interview with leader indicated two practices integrated. Survey index score indicate practices integrated.	1-EEO Training 2-MD 715	Rpt 2016 One year data <b>Some but not all programs integrated</b>	2015-2017-Above median
Practices focus on race				
Jose				
Inconsistent	MD 715 data indicated practices integrated. Interview with leader indicated one practice integrated. Survey index score indicate practices integrated.	1-Training	Rpt 2006, 2007, 2009, 2011 <b>Most programs integrated</b>	2008-2017-Above median
Practices do not focus on race				
Agnes				
Consistent	MD 715 data for one year indicated practices integrated. Interview with leader indicated three practices integrated. Survey index score	1-Training 2-FEVS Analysis 3-Affinity Groups	Rpt 2014 One year data <b>Some but not all programs integrated</b>	2015-2017-Above median
Practices focus on race				

		indicate practices integrated.			
<b>Willa</b>					
Inconsistent	MD 715 data	1-Training	Rpt 2004-2017	2015-2017-Above median	
Practices to address minority rep	indicated practices integrated. Interview with leader indicated one practice integrated. Survey index score indicate practices integrated.		2004-2006 practices not integrated. 2007-2017 <b>Most but not all programs integrated</b>		
<b>Nate</b>					
Inconsistent	MD 715 data for one year indicated	1-Special Observances	Rpt 2016	2015-2017-Above median	
Practices do not focus on race	practices integrated. Interview with leader indicated one practice integrated. Survey index score indicate practices integrated.		One year data <b>Some but not all programs integrated</b>		
<b>Alena</b>					
Inconsistent	MD 715 indicated most practices integrated in 2011-2016. Interview with leader indicated two practices integrated. Survey index score indicate practices integrated.	1-Training 2-Special Observances	Rpt 2008-2016	2008-2017-Above median	
Practices to address minority rep			Fluctuation of practices integrated. Most practices integrated. In 2016 some practices no longer integrated. Practices not integrated before 2011 were integrated 2011-2016. <b>Most but not all programs integrated</b>		
<b>Sergio</b>					
No practices address rep	Unable to complete comparison	No programs	No rpt req'd	No report req'd	
<b>SENIOR LEVEL LEADERS</b>					
<b>Nadine</b>					
	Unable to complete comparison	1-Diversity Training	No rpt req'd	No report	
<b>Alicia</b>					
Inconsistent	MD 715 data for one year indicated	1-Special Emphasis Prog	Rpt 2014	Below median	
Practices do not focus on race	practices integrated. Interview with leader indicated one practice integrated. Survey below/above median.		One year data <b>Some but not all programs integrated</b>	2015 and 2016. Above median 2017.	
<b>Mitch</b>					
	Unable to complete comparison	No programs	No report req'd	No report req'd	

## Appendix O

### Representation of Agency Head

Table 10 Representation of the Agency Head

<b>Influence of Representation of the Agency Head</b>				
Influence of minority representation at the SES level on the integration of practices Used MD 715 reports, agency websites, and other online sources for agency representation.				
<b>Case</b>	<b>SES Representation</b>	<b>Practices Integrated</b>	<b>MD 715</b>	<b>FEVS</b> Note: No FEVS in 2009
<b>EEO/DIV LEVEL LEADERS</b>				
<b>Isabel</b>				
Inconsistent	Non minority	1-EEO Training 2-Climate Assessment	No report req'd <b>Some but not all programs integrated</b>	2008-2017-Above median
<b>1b-Professional</b>				
Consistent	Non minority	1-Special Observances 2-EEO Training 3-MD 715	No report req'd <b>Some but not all programs integrated</b>	2017-Above median
<b>Ophelia</b>				
Consistent	Non minority	1-Special Emphasis 2-Training 3-Diversity Councils 4-MD 715	Rpt 2012-2016 <b>Some but not all programs integrated</b>	2015-2017-Above median
<b>Stan</b>				
Consistent Programs for minority rep "bottom of the list" Programs for all	Non minority	1-EEO Training 2-Climate Assessment 3-Customized Training	No report req'd <b>Some but not all programs integrated</b>	2008-2017-Above median
<b>Ingrid</b>				
Inconsistent  Activities-no impact Div Ofc alignment under HR weakens prog	Non minority	1-Training	Rpt 2004-2017 2004-2006 practices not integrated. 2007-2017 <b>Most but not all programs integrated</b>	2015-2017-Above median
<b>Lilly</b>				
Unable to do comparison	Minority 2004-06 Minority 2016-17	No Programs	No report	2008-2017-Above median
<b>Camille</b>				
Inconsistent  Prog offered at field of but not confirmed if used. Prog not offered at HQ where leader works	Non minority	1-Training 2-Special Emphasis Prog	Rept 2012-2016 <b>Some but not all programs integrated</b>	2015-2017-Above median
<b>MIDDLE</b>				

<b>MANAGER LEVEL LEADERS</b>				
<b>Dean</b>				
Inconsistent  Programs do not focus on race	Non minority	1-Training	Rpt 2008-2016 Fluctuation of practices integrated. Most practices integrated. In 2016 some practices no longer integrated. Practices not integrated before 2011 were integrated 2011-2016. <b>Most but not all programs integrated</b>	2008-2017-Above median
<b>Lenny</b>				
Inconsistent  Practices focus on race	Minority 2017	1-EEO Training 2-MD 715	Rpt 2016 One year data <b>Some but not all programs integrated</b>	2015-2017-Above median
<b>Jose</b>				
Inconsistent  Practices do not focus on race	Non minority	1-Training	Rpt 2006, 2007, 2009, 2011 <b>Most programs integrated</b>	2008-2017-Above median
<b>Agnes</b>				
Consistent  Practices focus on race	Minority 2017	1-Training 2-FEVS Analysis 3-Affinity Groups	Rpt 2014 One year data <b>Some but not all programs integrated</b>	2015-2017-Above median
<b>Willa</b>				
Inconsistent  Practices to address minority rep	Non minority	1-Training	Rpt 2004-2017 2004-2006 practices not integrated. 2007-2017 <b>Most but not all programs integrated</b>	2015-2017-Above median
<b>Nate</b>				
Inconsistent  Practices do not focus on race	Minority 2017	1-Special Observances	Rpt 2016 One year data <b>Some but not all programs integrated</b>	2015-2017-Above median
<b>Alena</b>				
Inconsistent  Practices to address minority rep	Non minority	1-Training 2-Special Observances	Rpt 2008-2016 Fluctuation of practices integrated. Most practices integrated. In 2016 some	2008-2017-Above median

			practices no longer integrated. Practices not integrated before 2011 were integrated 2011-2016. <b>Most but not all programs integrated</b>	
<b>Sergio</b>				
Unable to complete comparison  No practices address rep	Non minority	No programs	No rpt req'd	No report req'd
<b>SENIOR LEVEL LEADERS</b>				
<b>Nadine</b>				
Unable to complete comparison	Minority 2012-2017	1-Diversity Training	No rpt req'd	No report
<b>Alicia</b>				
Inconsistent  Practices do not focus on race	Non minority	1-Special Emphasis Prog	Rpt 2014 One year data <b>Some but not all programs integrated</b>	Below median 2015 and 2016. Above median 2017.
<b>Mitch</b>				
Unable to complete comparison	Non minority	No programs	No report req'd	No report req'd