



October 2, 2002

Mr. Frank Hanna
Co-Chairman
White House Commission on
Educational Excellence for Hispanic Americans

Dear Mr. Hanna:

The Council of Federal EEO and Civil Rights Executives is composed of EEO professionals at different Federal agencies throughout the Washington Metropolitan Area. As such, we would like to offer our observations on the Report on Executive Order 13230 (the Report) that agencies submitted to the White House Initiative on Educational Excellence for Hispanic Americans (the Initiative) on September 30, 2002.

Following is a list of our concerns:

- 1) The letter requesting the Report, which was dated August 29, 2002, was delivered to the Federal agencies during the first week of September. Considering that the Report was due to the Initiative on September 30, this gave agencies less than thirty days to collect the data—an unrealistic goal for agencies like the Department of Defense and the Treasury Departments, which have large workforces and oversea personnel. In the future, the Initiative should give agencies a minimum of two months to compile this Report.
- 2) The requested data was for fiscal year 2002, and yet the letter from the Initiative was sent to Federal agencies before the end of fiscal year 2002. The last Report issued by the Initiative covered fiscal year 2000. Thus, although Executive Order 13230 stipulated that the Initiative had to submit a report to the President by September 30, 2002, it did not have to be a report with fiscal year 2002 data. Instead, the Initiative should have collected data for the fiscal year 2001 Report, and still be able to meet the September 30, 2002 due date of the Executive Order.
- 3) Since the Initiative gave Federal agencies until September 30, 2002, to submit their Reports, it did not allow itself time to edit the agencies' Reports and generate a Report for the entire Federal Government. We don't think that the intent of the Executive Order was for the Initiative

to submit a plethora of Reports to the President. Instead, we believe that the White House intended for the Initiative to generate one report for the Federal Government.

4) By generating its own unique form for this Report, the Initiative made it impossible to compare the participation rate of Hispanic in Federal education programs and services with that of African Americans and Native Americans. At a time of shrinking federal funds, it is essential that Federal funds be spent wisely. Thus, if an agency wanted to know whether there was an equitable distribution of its funds to the different minority serving institutions, it would not be able to do it based on the form developed by the Initiative. Consequently, an agency could be overspending its educational funds in minority serving institutions that graduated students who belonged to minority groups that were overrepresented in that agency's workforce, when it should have been spending more of its educational funds in institutions that graduated students belonging to minority groups who were underrepresented in that agency's workforce. In addition, if an agency wanted to know which Hispanic Serving Institutions received its funds and how much, it would not be able to get this important information from the Initiative form. We suggest that the Initiative use the same report format as the one used by the White House Initiative on Historically Black Colleges and Universities.

For your convenience and comparison purposes, we have enclosed the HBCU forms, as well as the one developed by the White House Initiative on Educational Excellence for Hispanic Americans.

Sincerely,

Jorge E. Ponce
Co-Chair

Delia Johnson
Co-Chair

Enclosures

cc: Octavio Visiedo
Chairman of the Government
Accountability Workgroup

Charles Patrick Garcia
President's Commission on Educational
Excellence for Hispanic Americans

Rod Paige
Secretary
U.S. Department of Education

Leslie Sanchez
Executive Director
White House Initiative

