

# Job Validation: The Library of Congress Experience

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I am particularly pleased to have the opportunity to share with you the Library of Congress' experience on job validation. There will be no attempt on my part to delve into the legal and legislative history of Title VII and the ensuing decisions made by the courts and such administrative bodies as the Equal Employment Opportunity Commission, the United States Civil Service Commission, and others. This has been covered elsewhere. I will be speaking from the point of view of a management official in a Federal agency that happens to be the largest library in the world. Our organizational set up and personnel system may be more rigid or structured than many of your own, although you may wonder how this could be possible.

For the sake of convenience and form, I am going to divide the topic into three segments: (1) background information on the Library's Affirmative Action Program which laid the groundwork for the Library's validation study; (2) the "mechanics" of the study (for this section, I draw heavily on the contractor's report); and (3) the results and the impact of the study.

The topics of minimum qualifications and job validation are subject to emotional response. The responses include acceptance of the fact that qualifications *should* be job related and that they should *not* have adverse impact on the protected classes defined under Title VII as well as feelings that such moves are attacks on library professionalism, will dilute services, will impact adversely on the quality of Library X's staff, etc. The June 1, 1978, issue of *Library Journal* stated that this program "could be a hot one."

The word "hot" brings me back to the hot summer of 1971 that marked the beginning of the Library of Congress' "Time of Troubles" which took place in the early 1970's. Several of the Library's personnel practices came under fire. During this period, the Library of Congress was put under the Equal Opportunity Act of 1972 with the specific statutory responsibility for equal employment opportunity implementation vested in the Librarian of Congress (the Library is in the Legislative Branch and is not subject to many personnel procedures of the Civil Service Commission which oversees the Executive Branch agencies).

In order to discharge the Library's responsibility under the law, the Librarian requested positions and funds from the Congress. The Library's affirmative action program, which had been in existence on a more informal basis for many years, was formally structured. Eugene Walton was selected to direct the Library's new Affirmative Action Office. Dr. Walton had several years of Federal experience in the EO area. One of the first areas of concern was the use of tests (defined in the more narrow terms of paper/pencil, performance, etc., rather than the broader definition used by psychologists).

After an extensive 1973 study by Lawrence Johnson and Associates, the Director of Personnel, Robert W. Hutchison, issued a memorandum department directors and division chiefs which, in effect, suspended 24 of tests which were found to be non-objective. On April 20, 1978, I issued a memorandum which centralized the responsibility for the development and approval of tests in the Personnel and Labor Relations Office. I will mention the validation of tests later.

Another area to receive attention was the Library's qualification standards for its positions. In 1974 Carolyn Payton, a psychologist at Howard University, conducted a study of 2,500 plus announcements of job vacancies or postings. Dr. Payton's May 1975 report, *A Survey of the Origin of Job Postings and Derivation of Required Position Qualifications in the Library of Congress*, concluded that the Library's posted qualifications were inconsistent for families of positions and, often times, for the same position.

About the same time that the Payton Report was being discussed, the Library was in the process of selecting a firm to study and validate job qualification requirements for three positions in the Library of Congress. The positions included descriptive catalogers, subject catalogers and reference librarians. As a result of a request for proposal, seven firms submitted plans for the validation study. A contract committee, chaired by Tommy Shaw, the Library's research psychologist, reviewed the proposals. On June 19, 1978, the Library awarded the contract to PRC Systems Sciences Company (PRC).

## Mechanics of a Validation Study

Before I describe the mechanics of the validation study, it is necessary to nail down the concept of a "minimum qualification." A minimum qualification is a pass-fail hiring criterion which can be evaluated for all applicants on the basis of information obtained from the application blank. These devices are usually the first step in the selection process and serve as a fast and inexpensive way to screen out applicants who will not be hired; thus one can see the importance.

As you recall I mentioned three librarian positions: descriptive catalogers, subject catalogers, and reference librarians. Actually these three positions include career ladders (promotion plans) generally including GS-7, GS-9, GS-11 and GS-12 "rungs." The GS-13 level is a supervisory level. The GS refers to the general pay schedule used in the Federal government; the numbers refer to grades (on a 1-18 scale) and are derived through the position classification process. The higher the grade, the higher the salary. Thus GS-7 has a present starting salary of \$12,336 per year, GS-9—\$15,090, GS-11—\$18,258, GS-12—\$21,883 and GS-13 has a starting salary of \$26,022. The grades are based upon levels of duties and responsibilities. At the time of the PRC study, the three positions were filled by 414 incumbents.

As a first step, PRC compiled a preliminary list of job tasks after an analysis of the jobs in question by reviewing existing position descriptions, job postings or vacancy announcements, brochures about the Library of Congress, etc., and a survey of 18 section heads who were asked to name what they felt were the most important job duties of the librarian position.

they supervised and what they felt were the most important worker characteristics (i.e., knowledge, skills, and abilities) needed for successful job performance. In addition, the preliminary list of job tasks and worker characteristics collected from the various sources served as the basis for "brainstorming" sessions with groups of two to eight librarians from each of the 13 job title/GS-level combinations represented in the sample. A final review of the job tasks was made by the management of the then Processing and Reference departments to add more items and make other refinements as needed before the list of job tasks was put into questionnaire form for evaluation. The final result was a task analysis questionnaire custom designed for the three librarian positions.

In addition to the 316 job tasks which formed the bulk of the questionnaire, a number of more global questions about the work performed were included to summarize the time spent on various activities which cut across many job tasks (e.g., the percentage of time spent reading in languages other than English). Although each questionnaire was anonymous, the last section asked for descriptive information about the survey respondents (e.g., GS-level, job title, educational background, etc.).

The questionnaire was sent to the 414 librarians. Ninety-two percent (383/414) of the questionnaires were returned in usable form. The results were tabulated and keypunched. On the basis of their analysis of the critical job tasks and an independent review of all job tasks by recognized authorities in library science from two universities, the PRC contractors developed qualification requirements which they believed would satisfy all legal and technical requirements for job relatedness and minimization of adverse impact in accord with the then established *Guidelines on Employee Selection Procedures* of the Equal Employment Opportunity Commission. The qualifications proposed by PRC are summarized in Table I. The results are self-explanatory.

## Impact of Study

Before I discuss the impact of the study, I draw your attention to Table II which presents a statistical analysis of the 1,083 Library of Congress staff members who are in professional librarian positions. The figures suggest that for the professional librarian series, there is no adverse impact on the protected classes (the figures do not speak to minority representation at the higher grade levels, a topic discussed later). To put the data into some perspective, the national professional librarian work force is approximately 6 1/2% black (according to an article on black librarians in the February 1978 issue of *American Libraries*.) LC's professional librarian work force is almost 13% black. The ARL salary survey covering 1976-1977 states that the average overall percentage of minority professional librarians in 83 research libraries is approximately 9%. Minorities hold approximately 23% of LC's professional librarian positions. Information in Table II also demonstrates one important fact—the Library of Congress has not had a positive educational requirement for the master's degree (I use master's degree rather than MLS because many of our positions require educational background in a specific topic or area). As

**TABLE I**  
**Summary of Proposed Minimum Qualifications for Descriptive Cataloger, Subject Cataloger, and Reference Librarian**

GS-Level	Descriptive Cataloger	Subject Cataloger	Reference Librarian
7	No positions	36 semester hours or equivalent of course work in specified area relevant to job vacancy	36 semester hours or equivalent of course work in specified area relevant to job vacancy
9	<ul style="list-style-type: none"> <li>• Survey course in librarianship (3 semester hours or equivalent)</li> <li>• The organization of knowledge (3 sem. hrs. or equiv.)</li> <li>• Reference and information sources (3 sem. hrs. or equiv.)</li> <li>• Cataloging and classification of library materials (3 sem. hrs. or equiv.)</li> </ul>	1 year related work experience at GS-7; or following course work: <ul style="list-style-type: none"> <li>• Survey course in librarianship (3 sem. hrs. or equiv.)</li> <li>• The organization of knowledge (3 sem. hrs. or equiv.)</li> <li>• Reference and information sources (3 sem. hrs. or equiv.)</li> <li>• Cataloging and classification of library materials (3 sem. hrs. or equiv.)</li> <li>• Course work in specified subject area relevant to job vacancy (36 sem. hrs. or equiv.)</li> </ul>	1 year related work experience at GS-7; or following course work: <ul style="list-style-type: none"> <li>• Survey course in librarianship (3 sem. hrs. or equiv.)</li> <li>• Reference and information sources (3 sem. hrs. or equiv.)</li> <li>• Technical services in libraries (3 sem. hrs. or equiv.)</li> <li>• Library systems analysis (3 sem. hrs. or equiv.)</li> <li>• Course work in specified subject area relevant to job vacancy (36 sem. hrs. or equiv.)</li> </ul>
11	1 year relevant work experience at GS-9 level at LC	1 year relevant work experience at GS-9 level at LC	1 year relevant work experience at GS-9 level at LC
12	2 years relevant work experience at GS-9 or GS-11 level at LC <sup>1</sup>	2 years relevant work experience at GS-9 or GS-11 level at LC	2 years relevant work experience at GS-9 or GS-11 level at LC
13	No additional MQ's—use test battery instead	No additional MQ's—use test battery instead	No positions

<sup>1</sup> See page 25 of each test administration kit for details.

TABLE II  
Breakdown of LC Employees in 1410 (Librarian) Series by Race and Education

Classification	Total Number/Percent	Excess of Master's Degree or in	Number Having Master's Degree or in	Number Not Having Master's Degree/Percent	Total Percent
Black	137	12.7% <sup>1,2</sup>	39	98	71.5%
Spanish Surnamed	18	1.7% <sup>2</sup>	12	6	33.0%
Oriental	91	8.4% <sup>2</sup>	77	14	15.4%
Other	837	77.2%	578	259	31.0%
Totals:	1,083	100.0%	706	377	34.8%
					100.0%

<sup>1</sup>The national professional librarian work force is approximately 6½% black (*American Libraries*, February 1978, page 81)

<sup>2</sup>Figures add up to 22.8%. The average overall percentage of minority professional librarians in 83 research libraries is approximately 9% (ARL Salary Survey, 1976-1977)



a result, many of our staff members who do not have master's degrees have been successful in moving into professional librarian positions, including substantial numbers from the protected classes. There has been, however, a problem in communicating this fact through our present job announcement (posting) procedures. The present form, unless one reads the "fine print," does not make it clear that our minimum educational qualifications are not positive requirements. You will hear the solution to this problem in a few minutes.

As far as the impact of the report is concerned, there is a mix of pro and con. As of this date, the Library has not formally adopted the recommendations of the PRC study. Why? The report and recommendations contain some flaws: (1) Although it is not a serious problem and was not part of the contract, the PRC did not determine if there were adverse impact under the present qualifications standards. (2) PRC made an assumption that the master's degree was a positive educational requirement, thus a minimum qualification—this is not the case. (3) If the Library adopted the proposed PRC minimum qualifications, the possibility of upward mobility, in my opinion, would be seriously hampered for a year or two because the probability of anyone, outside the master's degree holder, having the required course work would be slight. In addition, the American educational system may work against individuals who would wish to pick and choose the specific course work. This is a serious drawback. (4) The PRC proposal equates two years of work experience at the GS-9 level as sufficient qualification for the GS-12 level. (See Table I) In addition to the legal problems, the proposal seems to suggest that GS-9 level work equates to GS-11 level work. If the Library were to agree to this, the Library's rather generous career ladder (promotion plan) system in the professional librarian series would be in serious question, thus jeopardizing the status of the series.

The PRC study has had positive effects. In May 1976, the Personnel and Labor Relations Office recommended validation of qualification standards for all positions in the Library, using a three-phase program which culminates in a job or task analysis. The first stage which corrects the faults found in the Payton report, has been implemented. The Library will soon embark on the second stage, which will result in codification of our qualification standards. In addition, there is all likelihood that this effort will be accelerated. To our knowledge there is no other Federal agency undertaking such a program. Through negotiations with the various labor organizations, the Library will be replacing its twenty-five year old selection system with a system which can be validated. On June 14, 1978, the Library signed contracts with Locals 2477 and 2910 of the American Federation of State, County, and Municipal Employees (AFSCME). The two locals represent over 3,000 LC staff members; the contract article covering the new selection procedure will be implemented in December of this year. It also includes a subsection which limits the Library's use of tests to those which have been or are being validated. Our office has developed a recruitment list of over 340 sources which will enable us to increase our recruitment of minorities and women for consideration for high level positions throughout the library.

I mentioned earlier the problem of clarifying the minimum education requirements on our job announcements or postings as we call them. I am

pleased to announce that effective the end of this year, announcements of position vacancies will carry specific information for the substitution of experience for education or education for experience, thereby clarifying to a greater degree the Library's present practice (i.e., minimum qualifications will not contain positive education requirements). This provision was also negotiated with AFSCME.

The Library of Congress experience in job validation proved to be only the first of many to come. The spin-off of that experience has opened new roads as well as new problems. The Library has taken positive steps to meet both the requirement and challenge of job validation. The Library's position on the PRC recommendations is that the substance of those recommendations, that is the validity of our qualification standards, has been built into the labor contracts and adopted through negotiations between the parties. This approach, along with approval of the May 1976 recommendation to validate our qualification standards and the expected increase in our validation pace, has, in effect, fulfilled the PRC study.