

fide system under the law. More recently, promotion systems have been studied to see if they relate to the glass ceiling effect and the kinds of barriers that have been found to stifle the rise of minorities and women upward in organizations.

Affirmative Action Programs Regulations

Regulations on Affirmative Action Programs from the Office of Federal Contract Compliance Programs (OFCCP) require promotion placement goals where there are discrepancies between percentages of minorities and women employed and available internally in job groups. Accompanying these goals must be an identification of problem areas and action-oriented programs to correct these areas. As the case of external recruitment, the regulations are virtually silent on indicators of specific steps the organization might take to correct promotion system problems. Previous (now expired) regulations provided many useful ideas, including the following:

- Post or otherwise announce promotion opportunities.
- Make an inventory of current minority and female employees' academic skill, and experience levels.
- Initiate necessary remedial job training and work-study programs.
- Develop and implement formal employee evaluation programs.
- Make certain that "worker specifications" have been validated on job performance-related criteria (neither minority nor female employees should be required to possess higher qualifications than those of the lowest-qualified incumbent).
- When apparently qualified minority or female employees are passed over for upgrading, require supervisory personnel to submit written justification.
- Establish formal career counseling programs to include attitude development, education aid, job rotation, buddy systems, and similar programs.
- Review seniority practices and seniority clauses in union contracts to ensure such practices or clauses are nondiscriminatory and do not have a discriminatory effect.

As can be seen, the previous regulations contained a broad range of suggestions for reviewing and improving promotion systems. In terms of recruitment itself, the previous regulations appeared to favor developing KSAO-based information about employees as well as an open promotion system characterized by job posting and cautious use of seniority as a basis for governing upward mobility.

Bona Fide Seniority Systems

Title VII (see Chapter 2) explicitly permits the use of bona fide seniority systems as long as they are not the result of an intention to discriminate. This position presents the organization with a serious dilemma. Past discrimination in external