

holders, approximately 48 percent held degrees in science and engineering. This indicates that a lower percentage of Asian Americans would tend to fit the degree profile of the current management workforce.

It is also important to note another point which the constituent's analysis glosses over: while educational attainment and degree field play a role in determining management opportunity, the EEO category 1 includes a wide variety of management positions. As such, some of these positions would not be considered an advancement opportunity among those currently holding professional positions, which forms the basis of the constituent's analysis.¹⁰ The Government Accountability Office has pointed out the limitations of applying the Census Bureau's Current Population Study (CPS) to studies involving managerial positions¹¹: "There are two major limitations on the use of CPS data. First, the CPS occupational classifications do not distinguish between supervisory and nonsupervisory employees, which is important for the long and short duties tests under the Fair Labor Standards Act (FLSA). Therefore, one job title, 'managers and administrators,' could include the President of General Motors, but it may also include a receptionist. Second, CPS respondents self-identify their duties which raises questions of accuracy and could result in overestimates of the number of management employees and, consequently, may overestimate the number of exempt employees." Many management positions, such as those in construction, may have no or a negative relation to higher education. Moreover, those holding certain degrees, especially advanced degrees, may not seek out such positions.

We also note that the constituent presents data on the age profiles of the different classes (also not considered in his calculations) to suggest that an underlying age differential is relevant to understanding the alleged problem. In contrast, based on the Census Bureau report, "The Asian and Pacific Islander Population in the United States," Asians are only slightly younger than the population as a whole (26% are under age 18, vs. 23% for the general population). Age, therefore, is not a significant factor in exploring this issue. These types of overall comparisons may mask potential relationships or highlight ones that do not exist in the presence of more detailed information. A more comprehensive study would be required to identify any influence age may have on the opportunity for Asian Americans to enter into management positions.

In sum, the constituent's "study" fails to account for educational differences that exist among the classes and the broad nature of the different management positions included in the EEO-1 management category. The factors discussed herein likely represent only a fraction of all the factors that in reality influence an individual's opportunity to enter into a management position. In order to conduct a more meaningful study, the constituent would need to conduct a thorough review of the literature available on these topics to identify key factors and considerations involved in conducting analyses of this type. With regard to available data sources, we recommend that such a researcher contact the Census Bureau and other agencies to identify

¹⁰ EEOC has recently changed the EEO-1 form to split this category into two levels to segment lower and middle management from the upper levels. See - <http://www.eeoc.gov/press/1-27-06.html>.

¹¹ (GAO/HEHS-99-164, pg. 42)