PROPOSED ORGANIZATION AND MISSION CONCEPT
FOR THE
USATSRCOM
EQUAL EMPLOYMENT OPPORTUNITY OFFICE

BY

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DISPOSITION

Destroy this study when no longer required. Do not return it to the originator.
This study investigates the EEOO requirements as set forth by Public Law and implementing Agency regulations. It also establishes the resources required to effectively accomplish the required program under optimal staffing. Under less than optimum staffing, those elements of the program which must be deleted or accomplished only in part are delineated. The effect of program degredation on costs and the risk of class action suits is also explored.
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I. INTRODUCTORY STATEMENT.

The mission of the Equal Employment Opportunity Office is to advise and assist the Commander, TSARCOM, on all matters relating to the development, execution, refinement and evaluation of the Command's EEO Affirmative Action Program. At TSARCOM, the EEO Office services approximately five thousand civilian employees.

A. PROBLEM. Under its current TDA structure it is impossible for the EEO Office to effectively function to accomplish the goals prescribed by public laws and regulations. With the EEO staff currently authorized, EEO resources have been mostly geared toward crisis management; consequently, many essential EEO functions have "fallen by the wayside."

B. OBJECTIVE OF THE STUDY. The objective of this study is to identify the resources needed to effectively accomplish EEO Affirmative Action Program goals at TSARCOM.

C. BACKGROUND. Under title VII of the Civil Rights Act as amended by the EEO Act of 1972 (PL 92-261), at Appendix A, many EEO actions are required to be either performed or monitored by each government agency. In the Department of Defense, these actions are delegated by commanders to EEO Officers and their staff. These actions include responsibility for publication of an EEO Plan of Action (POA),
review and evaluation of the agency's EEO programs, monitoring the Upward Mobility Program (UMP), training for managers and supervisors as well as for EEO officials and counselors, along with timely and procedurally correct processing of discrimination complaints, to name a few. Further tasks are set forth in DARCOM Pamphlet 690-4, which is a compilation of CPR 713 and DA and DARCOM EEO program management (Appendix B).

As the EEO Office operates on the staff level, there are also numerous suspenses, commander's notes and everyday office administration.

The resources of the present staff permit only handling discrimination complaints, suspenses, and "must see" contacts with managers and supervisors, while affirmative action goals are pursued on a "catch as catch can" basis. Therefore, the EEO Office (as well as the commander himself) is open to dissent from individuals and civil rights-oriented groups who feel that regulations are not being complied with.

II. METHODOLOGY. This study was based upon the actions taken by the EEO staff over the period 1 January - 31 May 1979 in the performance of their assigned tasks. By developing a method to accurately forecast the required EEO resources it will be possible to track (by workhours)
the amount of tasks that can reasonably be assumed to be performed in one workyear given the present staff allocations and the minimum staff required to fulfill total EEO obligations. This data was then sorted into various pertinent categories of EEO work.

A. COLLECTION OF DATA. The data collected covered the areas of EEO complaints and affirmative actions, including the special emphasis programs.

B. COMPILATION OF DATA. These data were then compiled by category and extrapolated on a linear basis to cover a total year. The workhours in each category were distributed according to appropriate staff member as determined by the EEOO. This determination was based upon nine year's Federal EEO employment experience at both the operational level (4500 employees) and the major subordinate command level (23,000 employees). The categories pertaining to complaints and affirmative action were developed mainly through perusal of FY 1979 TSARCOM EEO Plan of Action (Appendix C), a similar study done by the Military District of Washington (Appendix D), and aided by a local form, EEO Program Decision Package Item for Zero-Base Planning and Budgeting (Appendix E). The form, presently under revision, allows each individual providing input to the POA to project resources needed in terms of hours, cost, personnel, travel, and
tuition. It is a method by which measurable targeted goals are established on which an individual or an EEO management program can be judged.

C. ANALYZATION OF DATA. These data were compiled, tabulated, and analyzed to verify the degree of validity of the estimates as shown in the two examples cited below.

Example 1. Precomplaint counseling was checked by determining the number of precomplaints handled during three months of calendar year 1979, which came to twenty-four. An average number of contacts for each precomplaint between collateral EEO counselors and the Senior EEO Specialist was obtained (four contacts per precomplaint), and the time spent in each contact was averaged at approximately ninety minutes. This equates to one hundred forty-four hours per quarter, or five hundred seventy-six hours per year. To this five hundred seventy-six hours was added thirty minutes weekly for preparation for these counseling sessions (reviewing the cases, etc.) which came to approximately twenty-five hours per year. It was determined that approximately twelve percent of these visits would require the presence of the EEO Officer, while another sixteen percent would require the assistance of the leader of the complaints' area. Consequently, seventy-six hours was determined to be adequate for the GS-13 in this area, with one hundred hours and four hundred twenty-five hours for the GS-12 Senior EEO Specialist and the GS-09 counselor, respectively.

1. Presently, the GS-12 EEO Specialist is handling the complaint area with the help of twenty-five part-time collateral EEO counselors. This part-time counselor resource is not adequate, as twenty percent of the time the GS-12 spends on
complaints is spent contacting counselors involved in pre-complaint inquiries.

At various times there have been as many as eighteen precomplaints in process, with the result that there has been conflict with part-time counselors' full-time duty requirements. Part-time counselors should not have any more than one case at a time, however, at the present some counselors are handling three or four cases simultaneously.

Naturally, this drastically reduces counselor ability to process these complaints in a timely manner. Out of thirty precomplaints, only six were resolved in the prescribed twenty-one calendar days, and some have gone as high as eighty days. Reasons for the extended amount of time used by counselors to complete informal inquiries include their work schedule, TDY, emergency leave, difficulty in completing interviews and exhaustion of the means to effect an informal resolution.

2. To handle the volume of precomplaints, it will be necessary to increase the number of collateral EEO counselors to thirty-five. However, it would cost more to have this many part-time counselors than to have one full-time GS-09 counselor.
Other advantages of a full-time counselor are as follows:

a. Part-time counselors cannot be expected to be as experienced as a full-time counselor; hence, much of a part-time counselor's time is non-productive (such as searching for information, trying to get guidance on how to proceed on a case, etc.).

b. A full-time counselor would become known to managers, supervisors and personnel specialists and would establish a rapport, thereby expediting precomplaint processing.

c. The relatively more inexperienced part-time EEO counselor's effectiveness is sometimes vulnerable because of a lack of objectivity and/or the counselor does not always search out relevant data when called for.

d. Most importantly, the EEO Officer is not the full-time administrative supervisor of these collateral counselors, which prevents the exercise of control needed to obtain maximum results for the counseling function.

Example 2. An estimate of the division of time spent by the present EEO staff over the last five months is as follows:

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<tr>
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<th>Supervisory</th>
<th>Complaints</th>
<th>Suspenses</th>
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<td>15</td>
<td>35</td>
<td>50</td>
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<td>GS-12</td>
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<td>GS-11</td>
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<td>50</td>
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<tr>
<td>GS-11</td>
<td>0</td>
<td>0</td>
<td>100</td>
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<tr>
<td>GS-04</td>
<td>0</td>
<td>50</td>
<td>50</td>
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</table>
III. RESULTS. The results of the study (Figure 1a through 1o inclusive) substantiate the proposed organizational structure presented in Figure 2. It should be noted that EEO Specialists Liaison depicted in the phantom block under the Special Emphasis Program specialists (GS-11) shows their interface with the EEO Counseling Program.

A. MINIMUM STAFF NEEDED TO ACCOMPLISH GOAL. To summarize the findings, the workload in work hours per year of the proposed EEO staff is as follows:

1 GS-13 EEO Officer
1 GS-12 Leader, Complaints Area
1 GS-12 Leader, Affirmative Action Area
4 GS-11 EEO Specialists
1 GS-09 EEO Counselor
1 GS-08 EEO Assistant
1 GS-06 Secretary-Steno
1 GS-04 Clerk-Typist

Total hours equal 25,251 - an average of 2296 for each.
As can be seen by the total yearly work hours allocated to each staff member, a proposed staff of eleven employees is extremely conservative. However, based on current hiring restrictions, etc., the actual viable number needed, fourteen, was reduced to eleven. With the staff of fourteen average hours for each would be 1804.
B. CONSEQUENCES OF FAILURE TO PROVIDE FOR INCREASE

(IN TERMS OF ITEMS NOT COMPLETED). In addition to the hours shown to substantiate each task, a column has been provided to indicate which items can and cannot be accomplished given the present EEO Office staff. (Key: X = can be accomplished, 0 = cannot be accomplished). The Appendix F Manpower Comments, paragraph 2e & f, addresses the DA minimum staffing guidance. At the time these comments were written it was understood that more EEO resource data must be collected before a conclusion on TSARCOM EEO adequate staffing requirements could be made. This study has been the end result of the Appendix F, paragraph 3 requirement for: "Each supervisor must determine his or her manpower requirements, based on logic, experience, and meaningful accurate work load data." Of course, the DA guidance is for minimum resources requirements only. Further, we must take into consideration that at TSARCOM the work force is composed of 50 percent women, and the Standard Metropolitan Statistical Area stands at 17 percent minority. Therefore, as can be readily observed, such vital functions as implementation of the POA, monitoring of the special emphasis programs, career counseling of employees and special emphasis recruitment—all critical elements of the EEO program—cannot be performed under present staffing limitations.
## EEO Organization and Resources

<table>
<thead>
<tr>
<th>Work Projects</th>
<th>Pres T DA</th>
<th>HRT</th>
<th>Admin</th>
<th>Projected Resource Requirements</th>
<th>Discrimination Complaints Program</th>
<th>EEO Affirmative Action Program</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>EEO</td>
<td>SCI</td>
<td>STENO</td>
<td>CLERK</td>
<td>LIAISON COMPLAINTS</td>
<td>LIAISON AFFIRMATIVE ACT</td>
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### Complaints

1. Counsel with and provide information to aggrieved employees on matters that are not directly related to EEO.

   - **X**
   - 30
   - 75
   - 350
   - 125

2. Prepare monthly reports.

   - **X**
   - 54
   - 142
   - 284
   - 76
   - 152
   - 76

3. Supervise EEO counselors to include:
   - a. Precomplaint counseling
     - **X**
     - 66
     - 100
     - 825
   - b. Counselor training and development
     - 20
     - 20
     - 20
   - c. Changes in regulation and policy
     - 5
     - 10
     - 20
   - d. Precomplaint reporting system
     - **X**
     - 25

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*Figure 1a*
### EEO Organization and Resources

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<thead>
<tr>
<th>EEO</th>
<th>SECY</th>
<th>CLERK</th>
<th>Typist</th>
<th>Liaison Complaints</th>
<th>Liaison Affirmative Act</th>
<th>Leader of Complaints Program</th>
<th>EEO Assistant Complaints</th>
<th>Leader Affirmative Act Program</th>
<th>FWP</th>
<th>REP</th>
<th>Rep</th>
<th>Other Special Program</th>
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**COMPLAINTS cont**

4. Process X formal EEO complaints to include:

   a. Reviewing complaints and subsequent correspondence and reports from the complainant, investigator, CFO, legal, EEOC, OPM, Philadelphia activity commander, and in some cases the complainant's attorney, Congressmen and Union representatives.

   b. Prepare correspondence and reports to the above persons.

   **Figure 1b**
<table>
<thead>
<tr>
<th>WORK PROJECTS</th>
<th>PRES</th>
<th>T D A</th>
<th>MGT</th>
<th>ADMIN</th>
<th>PROJECTED RESOURCE REQUIREMENTS</th>
<th>DISCRIMINATION COMPLAINTS PROGRAM</th>
<th>EEO AFFIRMATIVE ACTION PROGRAM</th>
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</table>

COMPLAINTS cont

- c. Coordinate in person with directors/office chiefs, representatives, and commanders.

- d. Interview appropriate persons.

- e. Brief subordinate commanders, directors, and office chiefs.

- f. Set up chair and prepare minutes for adjustment meetings.

- g. Provide advice to aggrieved persons and supervisors.

- h. Travel to other activities.

Figure 1c
## EEO Organization and Resources

<table>
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<tr>
<th>Work Projects</th>
<th>Pres T D A</th>
<th>EEO</th>
<th>SRCT</th>
<th>STENO</th>
<th>CLERK</th>
<th>TYPIST</th>
<th>Limahon</th>
<th>Limahon</th>
<th>Leader of Complaints Program</th>
<th>Leader of Affirmative Act Program</th>
<th>Counselor</th>
<th>EEO Assistant</th>
<th>Leader Affirmative Act Program</th>
<th>FVP</th>
<th>REP</th>
<th>REP</th>
<th>Other Special Program</th>
</tr>
</thead>
</table>

**COMPLAINTS cont.**

1. Maintain intrasource tracking/reporting system.

3. Conduct inquiries and prepare the report on complaints of reprisal.

6. Conduct briefings and orientations on the EEO complaint system.

7. Provide administrative and logistical support for investigators and complainants.

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*Figure 1d*
### EEO Organization and Resources

<table>
<thead>
<tr>
<th>WORK PROJECTS</th>
<th>PRES TDA</th>
<th>MGT</th>
<th>ADMIN</th>
<th>PROJECTED RESOURCE REQUIREMENTS</th>
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**COMMENTS cont.**

8. Compile statistical data on EEO complaints.

9. Inform employees and management of changes in EEO regulations and policy through briefings, newspaper articles, memos, etc.

10. Provide input to EEO bulletins, regulations, and special reports.

11. Answer routine telephone requests for information.

![Figure 1e](image-url)
## EEO Organization and Resources

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### Complaints

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<thead>
<tr>
<th>Complaint</th>
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<tbody>
<tr>
<td>12.</td>
<td>Provide administrative (lira) and logistical support for EEO specialists.</td>
</tr>
<tr>
<td>13.</td>
<td>Supervise and direct activities of complaint program.</td>
</tr>
<tr>
<td>15.</td>
<td>Attend staff meetings.</td>
</tr>
<tr>
<td>16.</td>
<td>Travel in association with duties.</td>
</tr>
<tr>
<td>17.</td>
<td>Provide EEO assistance effort.</td>
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**Figure 1f**
### EEO Organization and Resources

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<tr>
<th>Work Projects</th>
<th>Pres</th>
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**COMPLAINTS cont**

18. Attend conferences.

| SUBTOTAL      | 999  | 1,047 | 1,123 | 1,227 | 0         | 2,376 | 1,379 | 1,600 | 0     | 236 | 0 | 0 | 0 | 0 |

Figure 19
| PROJECTED | RESOURCES ESTABLISHED | 2022 APPROPRIATED | APPROPRIATION | ACCOUNTANT'S | ADJUSTMENTS | APPROPRIATION | ACCOUNTANT'S | ADJUSTMENTS | APPROPRIATION | ACCOUNTANT'S | ADJUSTMENTS | APPROPRIATION | ACCOUNTANT'S | ADJUSTMENTS | APPROPRIATION | ACCOUNTANT'S | ADJUSTMENTS | APPROPRIATION | ACCOUNTANT'S |
|-----------|----------------------|------------------|--------------|--------------|-------------|--------------|--------------|-------------|--------------|--------------|-------------|--------------|--------------|-------------|--------------|-------------|--------------|--------------|--------------|-------------|--------------|
| DESCRIPTION | PURPOSE | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING | FUNDING |
| 1. Program | 0 | 90 | 80 | 20 | 20 |
| 2. Monitor | 0 | 90 | 20 | 20 |
| 3. Evaluate | 0 | 90 | 20 | 20 |

Figure 1h
### EEO Organization and Resources

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#### Affirmative Action Program cont

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<tr>
<th>Activity Description</th>
<th>Hours</th>
<th>Rate</th>
<th>Cost</th>
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<tbody>
<tr>
<td>4. Counsel managers and supervisors.</td>
<td>40</td>
<td>3</td>
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<tr>
<td>5. Conduct briefings and orientations.</td>
<td>40</td>
<td>3</td>
<td>120</td>
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<td>6. Attend briefings, orientations, and training sessions.</td>
<td>1/2</td>
<td>3</td>
<td>32</td>
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<td>7. Prepare correspondence, replies, and policy papers.</td>
<td>3/4 (late)</td>
<td>3</td>
<td>96</td>
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<td>8. Research data.</td>
<td>0</td>
<td>3</td>
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<td>9. Compile and analyze data and provide feedback.</td>
<td>1/2</td>
<td>3</td>
<td>80</td>
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|  | 8 | 8 | 8 | 8 | 16 | 50 | 50 | 50 | 50 | 64 | 64 | 64 | 64 | 64 |

**Figure 11**
### EEO Organization and Resources

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#### AFFIRMATIVE ACTION PROGRAM (cont)

10. Prepare 1/2 EEO bulletins and articles for other media.

11. Participate 1/4 24 in community efforts to improve conditions which affect minorities and women.

12. Plan and coordinate X 10 special events (BEP week, Black History, PWP).

13. Prepare X 20 24 budget estimates and perform supply actions.

14. Perform X 20 24 edit tasks of regulatory directives.

Figure 1j
### EEO Organization and Resources

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#### Affirmative Action Program cont

15. Travel in association with duties.

16. Supervise and direct activities if AAF and Evaluation Branch.

17. Answer routine telephone request for information.

18. Provide administrative and logistical support for EEO specialist.

**Subtotal**

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**Figure 1k**
### EEO Organization and Resources

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**Special Emphasis Program**

1. Assist in establishing, implementing, and monitoring the UNF.

2. Assess the effectiveness of directors in identifying factors and problems bearing on EEO.

3. Write affirmative action plans, establish goals, objective timetables.

4. Prepare work force evaluation, compile statistical analysis.

Figure 11
### EEO Organization and Resources

<table>
<thead>
<tr>
<th>Work Projects</th>
<th>Pres</th>
<th>Mgt</th>
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### Special Emphasis Program cont.

5. Provide leadership, administrative support to implement and monitor affirmative actions.

6. Conduct training briefings, orientations on FWP, HEP, and EEO.

7. Prepare and staff all (late) correspondence.

8. Provide guidance on the establishment of FWP/HEP/EEO advisory committee, etc.

9. Provide career counseling to employees.

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Figure 1a
## EEO Organization and Resources

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### Special Emphasis Program cont

10. Provide guidance to collateral EEO personnel in the handling of informal complaints.

11. Act as a focal point for serviced agencies to insure program implementations.

12. Establish relations with community (government and nongovernment organizations) who goals are in consonance with affirmative action.

13. Attend professional meetings, seminars, workshops, etc.

Figure in
## EEO Organization and Resources

<table>
<thead>
<tr>
<th>WORK PROJECTS</th>
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### Special Emphasis Program

14. Serve as EEO representative on various committees/panels, i.e., promotion, career program, training, awards, etc. for handicapped.

15. Responsible for program publicity.

16. Recruitment of females and minorities.

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| TOTAL    | 2,217    | 2,120  | 2,022 | 1,227 | 1,732  | 2,376  | 1,379  | 1,680    | 1,113  | 2,369  | 1,771  | 1,771  | 1,751    | 1,723  |

Present GPA = 9.8

Proposed GPA = 11 employees, 9.8

Projected Resource Requirement GPA = 10.1

Figure 10
STAFF ORGANIZATION FOR TSARCOM
EQUAL EMPLOYMENT OPPORTUNITY OFFICE

EEO Officer
GS-13

Leader
Complaints Area
GS-12

EEO Assistant
GS-08

Leader
Affirmative Action
GS-12

EEO Counselor
GS-09

Collateral
EEO Counselors

EEO Specialists
Liaison
GS-11

FWPM
GS-11

BETM
GS-11

HEPM
GS-11

OSPM
GS-11

Figure 2
ALTERNATE
STAFF ORGANIZATION FOR TSARCOM
EQUAL EMPLOYMENT OPPORTUNITY OFFICE

Secretary-Steno
GS-06

EEO Officer
GS-13

Clerk-Typist
GS-04

Affirmative Action
Analyst
GS-12

Leader
Complaints Area
GS-12

EEO Assistant
GS-08

EEO Counselor
GS-09

Collateral
EEO Counselors

EEO Specialists
Liaison
GS-11

FWFM
GS-11

BEFM
GS-11

HEFM
GS-11

OSFM
GS-11

Figure 2a
IV. CONCLUSIONS. At the present, a one-year POA would take approximately three years to implement. The present pattern of operation is resulting in the frustration and demoralization of four key groups: top managers and supervisors, concerned individuals in the work force, interested organizations and groups and the EEO staff.

It is entirely possible that there will be a cyclic effect that the perception that adequate resources are not being expended for an effective EEO Affirmative Action Program with the possible concomitant result of individual or class action discrimination complaints. It might be concluded that with the resources to manage an effective EEO Affirmative Action Program, we would find that we have fewer precomplaints as well as formal complaints. Further, with additional resources we can become much more involved with affirmative action objectives designed to overcome work force imbalances for minorities and women.

A fully staffed EEO operation, shown at Figure 2, would cost $200,000 annually. Present staffing cost is $123,000—additional wages would be only $77,000. In 1975 the US Civil Service Commission (now OPM) stated that an individual complaint carried to a hearing could cost an agency $45,000. It can be estimated that a complaint carried only to investigation costs $10,000.
A class action suit would probably cost TSARCOM well over $200,000. Therefore, although it is difficult to predict tangible savings—and who can evaluate the personal cost of inequities as related to an employee's health or productivity because he or she is a demoralized worker—we can conclude such savings could run into the hundreds of thousands at a 5000-employee major subordinate command.

The findings of this study are in consonance with a statement of Mr. Joseph S. Bennett, Director of Equal Employment Opportunity, Department of the Army, Office of the Assistant Secretary. The pertinent thought extracted from this statement is that at present there is "...no way to carry out the EEO program that the Commander requires and which provides the legal entitlements that employees are guaranteed without devoting sufficient resources to accomplish these tasks."

(Refer to Appendix G.)
APPENDIX A

TITLE VII OF CIVIL RIGHTS ACT

representatives of State and local agencies engaged in furthering equal employment opportunity, (4) representatives of private agencies engaged in furthering equal employment opportunity, and (5) representatives of employers, labor organizations, and employment agencies who will be subject to this title.

NON DISCRIMINATION IN FEDERAL GOVERNMENT EMPLOYMENT

Sec. 717. (a) All personnel actions affecting employees or applicants for employment (except with regard to aliens employed outside the limits of the United States) in military departments as defined in section 102 of title 5, United States Code in executive agencies (other than the General Accounting Office) as defined in section 105 of title 5, United States Code (including employees and applicants for employment who are paid from nonappropriated funds), in the United States Postal Service and the Postal Rate Commission, in those units of the Government of the District of Columbia having positions in the competitive service, and in those units of the legislative and judicial branches of the Federal Government having positions in the competitive service, and in the Library of Congress shall be made free from any discrimination based on race, color, religion, sex, or national origin.

(b) Except as otherwise provided in this subsection, the Civil Service Commission shall have authority to enforce the provisions of subsection (a) through appropriate remedies, including reinstatement or hiring of employees with or without back pay, as will effectuate the policies of this section, and shall issue such rules, regulations, orders and instructions as it deems necessary and appropriate to carry out its responsibilities under this section. The Civil Service Commission shall—

(1) be responsible for the annual review and approval of a national and regional equal employment oppor-
ed in this subsection to the Civil Service Commission shall be exercised by the Librarian of Congress.

(c) Within thirty days of receipt of notice of final action taken by a department, agency, or unit referred to in subsection 717(a), or by the Civil Service Commission upon an appeal from a decision or order of such department, agency, or unit on a complaint of discrimination based on race, color, religion, sex or national origin, brought pursuant to subsection (a) of this section, Executive Order 11478 or any succeeding executive orders, or after one hundred and eighty days from the filing of the initial charge with the department, agency, or unit or with the Civil Service Commission on appeal from a decision or order of such department, agency, or unit until such time as final action may be taken by a department, agency, or unit, an employee or applicant for employment, if aggrieved by the final disposition of his complaint, or by the failure to take final action on his complaint, may file a civil action as provided in section 706, in which civil action the head of the department, agency, or unit, as appropriate, shall be the defendant.

(d) The provisions of section 706 (f) through (k), as applicable, shall govern civil actions brought hereunder.

(e) Nothing contained in this Act shall relieve any Government agency or official of its or his primary responsibility to assure nondiscrimination in employment as required by the Constitution and statutes or of its or his responsibilities under Executive Order 11478 relating to equal employment opportunity in the Federal Government. (As amended)

SPECIAL PROVISION WITH RESPECT TO DENIAL TERMINATION AND SUSPENSION OF GOVERNMENT CONTRACTS

Sec. 718. No Government contract, or portion thereof, with any employer, shall be denied, withheld, terminated, or suspended, by any agency or officer of the United States under any equal employment opportunity law or order, where such employer has an affirmative action plan which has previously been accepted by the Government for the same facility within the past twelve months without first according such employer full hearing and adjudication under the provisions of title 5, United States Code, section 554, and the following pertinent sections: Provided, That if such employer has deviated substantially from such previously agreed to affirmative action plan, this section shall not apply: Provided further, That for the purposes of this section an affirmative action plan shall be deemed to have been accepted by the Government at the time the appropriate compliance agency has accepted such plan unless within forty-five days thereafter the Office of Federal Contract Compliance has disapproved such plan. (As added)
APPENDIX B

CHAPTER 1

INTRODUCTION

1-1. Purpose. This pamphlet provides policy guidance for US Army Materiel Development and Readiness Command (DARCOM) commanders and managers at all levels to insure that employment practices in DARCOM fully adhere to the letter and spirit of Federal policy guaranteeing equal employment opportunity to all persons without regard to race, color, religion, sex, national origin, age, or physical handicap. It is meant to supplement CPR 713 in the implementation of Public Law 92-261 of 1972.

1-2. Scope. a. This pamphlet applies to all elements of DARCOM.

b. The guidance contained herein is applicable to all aspects of employment and represents the pledge and commitment of the Commanding General, DARCOM, that there will be equal opportunity in all actions affecting employees and applicants for employment, and that all personnel actions will be accomplished absolutely free from discrimination.

1-3. Program Modification and Expansion. a. In recent years a variety of forces have evolved resulting in significant changes in the climate relating to employment practices in the United States. These forces have included legislation, executive orders, and court decisions banning discrimination in educational opportunities, housing, employment, and the use of public facilities. Another force has been articulate and sometimes militant action by those who have been victims of discrimination. Finally, there has been a developing awareness and acceptance by society in general, of a new role for minority groups and women, as required by law and demanded by those who have been subjected to acts of discrimination. These forces have not ended discrimination; however, they have provided an atmosphere conducive to cessation of discriminatory practices. They also form an environment which fosters full equality of opportunity in employment within each element of DARCOM.

b. Currently the mandate of Equal Employment Opportunity has become reality and has ascended to a place among the nation's cherished ideals. Yet, even though it is universally accepted as a goal, the means of actually achieving the goal remains a challenge and a task to be accomplished. In recognition of this fact, DARCOM employment programs will be administered in such a manner to assure optimum equality of opportunity in employment. Every effort will be made to correct inequities, to revise existing policies and practices not fully supportive of Federal policies, and to promote a climate of social harmony within the total workforce of DARCOM. To this end, the policies and guidance contained in this pamphlet are designed to be practical in approach and application and to encourage innovative techniques that show promise of producing effective results in reaching the ultimate
APPENDIX B

objectives of creating a positive awareness of people - their needs, motivations, and aspirations - so that each employee may realize optimum equality of opportunity and achievement in one's career pursuits.
APPENDIX B

The Equal Employment Opportunity Officer (EEOO).

(1) The two main areas of concentration within the EEO Program are:

(a) Affirmative action and;

(b) The EEO complaint process. A positive EEO Program is one carried out under a written plan of action which requires and provides for an effective system for analysis of the program, identification of significant problems, development, and implementation of specific and realistic action plans and effective follow up at all levels. The positive implementation of the EEO Program is initiated by top management and involves the continuing support of managers, supervisors and staff officials at all levels in plans and actions designed to reach both short and long range objectives for achieving definite and measurable progress toward the employment status of minorities and women in all aspects of employment policy and practice. In addition, equal employment opportunity is provided through effective administration of all civilian personnel programs and through full adherence to regulations and the merit principles governing those programs.

(2) The EEO Officer is responsible for total EEO Program administration and management including the Federal Women's Program and the Hispanic Employment Program. Under the direction of the Commander, who retains responsibility and accountability for the EEO Program, the EEO Officer provides program leadership and management to assure equal employment opportunity for all persons without regard to race, color, national origin, sex, religion, age, or physical handicap. The EEO Officer is the Administrator of the EEO Complaint Processing procedure. In carrying out EEO Program responsibilities, at a minimum, the EEO Officer will:

(a) Serve as the primary Advisor to the Commander in the areas of equal employment opportunity.

(b) Administer the EEO complaint process including class action complaints, within the regulatory and procedural framework of the most current USCSC, DA, and DARCOM regulations, guidance, policies, and directives. Accept formal complaints, taking expedient action to process them.

(c) Provide all aspects of program management related to the EEO Program to include problem identification, program development, planning, operating, control and evaluation and recommendations for program improvement.

(d) Provide active leadership to the EEO Program especially in the development and implementation of the local EEO action plan. With the assistance of the CPO, Special Emphasis Coordinators (FWPC and HEPIC), managers and supervisors, develop a specific and realistic EEO
APPENDIX B

Plan of Action including both short and long range objectives, with priorities and target dates for achieving definite and measurable progress. Staff and publish the EEO Plan of Action.

(e) Identify program or problem areas requiring study or attention. Initiate and/or participate in objective and in-depth reviews or studies of the existing employment situation to identify out-of-balance areas or inequitable management practices.

(f) Gain and maintain effective working relationships with all staff and line elements concerned in developing and carrying out program objectives.

(g) Maintain EEO Program visibility via special events such as Black History Month, Federal Women's Week, Hispanic Heritage Week, and educating and increasing the awareness of managers, supervisors and employees toward their EEO Program responsibilities. Publicize EEO Program via available media and public speaking engagements. Publish an EEO newsletter or bulletin.

(h) Furnish technical guidance and supervision to EEO Counselors in informal complaint processing procedures.

(i) Exercise managerial and supervisory skill in EEO Program management to include providing program leadership that will ensure a cohesive EEO staff working in harmony toward EEO Program goals, and delegation of program responsibilities.

(j) Insure the sufficient allocation of time and resources to provide the emphasis necessary in Federal Women's Program and Hispanic Employment Program visibility and effectiveness.

(k) Delegate the special emphasis program management responsibilities to the Special Emphasis Coordinators with full accountability to the EEOO for performance in consonance with total EEO Program goals and operations.

(l) Advise the commander and managers of equal employment conditions in the community that affect employability of minorities and women.

(m) As a representative of the Commander, participate at the local level with schools and universities and other public and private groups in cooperative action to improve employment opportunities for minorities and women.

(n) Provide continuous evaluation of program progress in relation to the objectives established with provisions for feedback and followup actions where required.

(o) Maintain intimate familiarity with conditions and circumstances affecting equal employment opportunity.
(p) Maintain contact and participate with special interest groups, community leaders, and EEO officials of DOD, DA, and other Federal agencies to provide information concerning program status, coordinated activities, pooling of resources, etc.

(q) Analyze discrimination complaints to identify problem areas and develop information for use in designing more effective program plans and actions.

(r) Provide reports in a timely fashion as required by the USCSC, DA, and DARCOM.

(s) Take necessary immediate action to adjudicate discrimination complaints after US Army Civilian Appellate Review Agency (USACARA) investigation and to carry out the Commander's proposed decision to accept, modify or reject USACARA recommendations.

(t) Develop and maintain the essential interface and close working relationship with the Civilian Personnel Officer in identifying and resolving problems related to equal employment opportunity.

(u) Develop and conduct EEO Program training for all managers, supervisors and employees on an annual basis.

(v) Serve on Boards and Committees with assigned functions that directly or indirectly affect women and minorities.

(w) Interpret and apply the most current USCSC, DA and DARCOM regulations, policies, and directives. Establish and maintain a reference library of all current guidance and regulations pertinent to the EEO Program.

(x) Insure an Individual Development Plan (IDP) is developed for all EEO Officials.

f. Federal Women's Program Coordinator (FWPC). The FWPC serves under the supervision of the Equal Employment Opportunity Officer to insure coordination of the total EEO Program. As a minimum FWPC responsibilities should cover the areas listed below. The priority and degree of emphasis given will vary depending upon local needs and will be affected by the amount of time and resources available to the FWPC.

(1) Serves as the primary staff advisor to commanders and EEO Officers and as a resource person on the unique concerns of women, with the authority to cross organizational lines.

(2) Program Management. The FWPC has responsibility for all aspects of program management related to the Federal Women's Program to include problem identification, program development, planning, operating, control and evaluation and recommendations for program improvement. NOTE: The FWPC will consult with the EEO Officer and will keep the EEOO advised of FW activities.
APPENDIX B

(3) Assesses local recruitment, placement, classification, promotion, training and disciplinary patterns to determine whether or not inequity or lack of affirmative action exists in the employment of women overall and minority women when compared to men.

(4) Maintains liaison with employees, management and members of the Civilian Personnel Office to develop and recommend means of eliminating inequities in employment.

(5) Participates in the recruitment process through contact with and visits to educational institutions and other recruitment sources.

(6) Develops programs of instruction and participates in new employee and supervisory EEO training to insure that managers, supervisors and all employees understand the goals and objectives of the Federal Women's Program.

(7) As a representative of the commander, participates in local and national meetings and conferences conducted by civic groups and other organizations that are concerned with eliminating discrimination against women and minorities and in promoting the employment and advancement opportunities for minorities and women.

(8) Assures continuing contact with Federal Women's Program Coordinators and other EEO officials from other DOD activities and other Federal agencies to acquire and share knowledge of effective methods and procedures to meet the objectives of the EEO Program.

(9) Reviews the issues involved in complaints of sex discrimination in order to identify those substantive matters which reflect patterns of practice, supervisory attitudes, or other problem areas which result in denial of equal opportunity to women and minorities in employment, promotion, training, status and recognition. Note. The FWPC is authorized to receive EEO complaints and upon receipt will take the required action to insure that the complaint processing continues in accordance with CPR 700 (C13 and C16) 713B, Appendix B. Assisting the EEO Officer or EEO Counselor, as appropriate, in the informal resolution and adjudication of complaints of discrimination.

(10) Interfaces with the EEO Officer, Civilian Personnel Officer and the CPO staff in identifying positions (by type, job family and organizational location) that lend themselves to job restructuring and career ladders to assure that the Upward Mobility Program is alleviating the problem areas surrounding the concentration of women in lower level, dead-end positions.

(11) Develops affirmative action goals related to women to eliminate the factors within the work force that limit equality of opportunity for women and minorities and assessment of accomplishment of EEO Plan of Action goals. The FWPC will evaluate FWP progress on a regular basis.
(12) Serves on boards and committees as a member or in an 
advisory capacity where the functions either directly or indirectly 
affect the status of women.

(13) Works closely with the Hispanic Employment Program Coordinator 
in areas of special concern to Hispanic women or when the Spanish 
language is spoken.

(14) Functions and participates as a member of the EEO staff 
and as such assists the EEO Officer in meeting the total EEO program 
goals and priorities, being responsive to changing workload requirements.

(15) Performs all program management functions related to the 
Federal Women's Program to include problem identification, development, 
planning, operation, control and evaluation and recommendations for 
program improvement.

(16) Provides visibility to the FWP by conducting Lunch and 
Learn Sessions on a quarterly basis minimum and conducting Federal 
Women's Week activities on an annual basis; in addition, emphasizes 
the FWP utilizing available news media, radio and television 
interviews, acceptance of speaking engagements, etc., not limited to 
concentrating on program innovations and accomplishments, and use of 
statistics.

(17) Provides leadership, guidance and training in FWP re-
 sponsibilities to the FWP Committee. In addition, the FWPC keeps 
the committee informed of the most current issuances, i.e., regulations, 
pamphlets, directives, policy statements, and other data related to 
FWP planning, operation and evaluation. The FWPC requests actions 
from the committee identified with FWP priorities.

(18) Recommends and participates in special studies such as 
surveys of employment patterns in various occupations, organizational 
units and levels or downgrading of secretarial positions, to ascertain 
whether there are systemic barriers that limit opportunities for 
women. Questionnaires directed to women may also be developed and 
analyzed to determine the educational backgrounds, career goals, years 
of service, rate of progression, amount of training, etc. (Note. Union 
officials should be contacted prior to issuing a questionnaire when 
there is an exclusive bargaining unit within the command.)

(19) Assures familiarity with the union contract(s) in effect 
at the respective commands, to avoid being charged with unfair labor 
practices. When in doubt, consult with the Management-Employee 
Relations representatives in the Civilian Personnel Office.

(20) Interfaces with other management officials across organizational 
lines at all levels, in all areas that affect women, as a fully participating 
member of the managerial team.

(21) Interprets and applies the most current US Civil Service 
Commission, Department of the Army and DARCOM regulations, policies 
and directives. Maintains a reference library of most current guidance 
and regulations pertinent to the FWP.
(22) Participates in development and publicizing career counseling sources for employees at all levels throughout his/her command. Because many women have an acute need for improved career planning, the FWPC should work with the Civilian Personnel Office, other EEO officials, supervisors and managers to assure that adequate occupational information and guidance are readily available to employees.

(23) Should be alert to whether equal opportunity exists for women to attend all types of training courses, whether long term or short term, apprentice or upward mobility, technical, professional, managerial, executive or supervisory, clerical, or administrative.

g. Hispanic Employment Program Coordinator. The HEPC serves under the supervision of the Equal Employment Opportunity Officer to insure coordination of the total Equal Employment Opportunity Program. The specific duties of the HEPC depend upon the size and mission of the activity or command and the demographic composition of the community and work force. The following duties are the minimum expected of an HEPC.

(1) To assist in assessing local recruitment, placement, promotion, training, and disciplinary patterns to determine whether or not inequity or lack of affirmative action exists in the employment of Hispanics.

(2) Through liaison with employees, management, and members of the civilian personnel office to develop and recommend means of eliminating inequities in employment.

(3) To participate in the recruitment process through contact with, and visits to, educational institutions and other recruitment sources.

(4) Through coordination with responsible officials, to insure the full participation of Hispanics in Upward Mobility Programs.

(5) Through active participation in training courses, to insure that information on the Hispanic Employment Program is provided to all supervisors and managers.

(6) As a representative of the commander, to participate in local and national meetings and conferences conducted by civic groups and Hispanic organizations with the objective of implementing a program of positive community relations.

(7) Through continuing contact with Hispanic Employment Program Coordinators from other DOD activities and other Federal agencies, to acquire and share knowledge of effective methods and procedures to meet the objectives of the Equal Employment Opportunity Program.
APPENDIX C

PART D

REPORT OF OBJECTIVES AND ACTION ITEMS
OBJECTIVES/ACTION ITEMS

1 Area of Concern: Organization and Resources

1.1 Problem Statement: Maximum utilization of part-time EEO officials is not fully accomplished.

1.1.1 Objective: To assure all full- and part-time program personnel are effectively utilized to achieve maximum efficiency.

Responsible Official: EEOO

Target Date: 31 Mar 79

Affirmative Actions: Responsible Official Target Date

1.1.1.1 Review EEO counselor's appointments to determine need for replacements or additions.

 EEOS 31 Jan 79

1.1.1.2 Make all EEO collateral duties a part of the employee's job description.

 C, P&PM 31 Mar 79
OBJECTIVES/ACTION ITEMS

1 Area of Concern: Organization and Resources

1.2 Problem Statement: The EEO office is understaffed.

1.2.2 Objective: To fill vacant EEOO and EEOS (HEPC) positions.

Responsible Official: EEOO
Target Date: 31 January 1979

Affirmative Actions: Responsible Target
Official Date

1.2.2.1 Select best qualified (BQ) candidate for EEOO position.

1.2.2.2 Submit selection and referral register of BQ candidates for EEOS (HEPC) position to the EEOO.

1.2.2.3 Select BQ candidate.

CDR 31 Oct 78
C, R&P 15 Jan 79
EEOO 15 Feb 79
OBJECTIVES/ACTION ITEMS

1 Area of Concern: Organization and Resources

1.3 Problem Statement: The heavy administrative and clerical workload in the EEO office requires an increase in staffing.

1.3.3 Objective: To maximize EEO office efficiency by releasing EEO officer from routine tasks to manage overall EEO program; to respond to directives from the commander, higher headquarters and outside sources; and to provide more time in which to place greater emphasis on special programs by EEO specialists.

Responsible Official: EEOO

Target Date: 30 March 1979

Affirmative Actions: Responsible Target
Official Date

1.3.3.1 Review administrative and clerical workload and authorize additional position. C, FD 30 Apr 79

1.3.3.2 Establish position. C, P&PM 15 May 79

1.3.3.3 Initiate recruitment action to fill position. C, R&P 15 May 79

1.3.3.4 Select BQ applicants for position. EEOO 31 Jul 79
## OBJECTIVES/ACTION ITEMS

1 Area of Concern: Organization and Resources

### 1.4 Problem Statement: EEO staff members and CPD staff members require in-house cross-training in respective specialized subject matter areas.

### 1.4.4 Objective: To cross-train EEO specialists and CPD specialists so as to increase their respective knowledge and understanding of CPD/EEO requirements and responsibilities.

Responsible Official: EEOO

Target Date: 30 September 1979

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4.4.1 Finalize plans for cross-training of EEO specialists and CPD specialists.</td>
<td>CPD</td>
<td>31 Mar 79</td>
</tr>
<tr>
<td>1.4.4.2 Accomplish cross-training of one EEO specialist and one CPD specialist.</td>
<td>CPD</td>
<td>30 Sep 79</td>
</tr>
</tbody>
</table>
**OBJECTIVES/ACTION ITEMS**

1. **Area of Concern**: Organization and Resources

1.5 **Problem Statement**: A TSARCOM EEO committee must be established.

1.5.5 **Objective**: To assess the effectiveness of TSARCOM EEO program as it relates to people awareness and to recommend changes considered desirable or necessary to assure affirmative action, improve program elements, and achieve program goals and objectives.

   **Responsible Official**: EEOO

   **Target Date**: 30 June 1979

**Affirmative Actions**: | **Responsible Official** | **Target Date**
--- | --- | ---
1.5.5.1 Solicit membership from directors, office chiefs and the union. | EEOO | 15 Mar 79
1.5.5.2 Develop proposed committee regulation. | EEOO | 30 Apr 79
1.5.5.3 Submit to commander for approval. | EEOO | 15 May 79
1.5.5.4 Establish TSARCOM EEO committee. | EEOO | 31 Mar 79
APPENDIX C

OBJECTIVES/ACTION ITEMS

1 Area of Concern: Organization and Resources

1.6 Problem Statement: With a small EEO staff, EEO resources have been mostly geared toward crisis management.

1.6.6 Objective: To develop systems so as to more effectively use available EEO resources.

Responsible Official: EEO
Target Date: 30 September 1979

Affirmative Actions: Responsible Target
Official Date

1.6.6.1 Distribute an EEO assistance EEOO 30 Mar 79 visit schedule to all directorates/offices for FY 79/80.

1.6.6.2 Develop EEO program assessment guidelines for use by directors/office chiefs for self-assessment and for EEO staff use during assistance visits.
OBJECTIVES/ACTION ITEMS

1 Area of Concern: Organization and Resources (continued)

1.6 Problem Statement:

1.6.6 Objective:

Responsible Official:
Target Date:

Affirmative Actions: Responsible Target
Official Date

1.6.6.3 Convert the EEO plan of action to the commander's review and analysis format.
EEOO 31 Mar 79

1.6.6.4 Write new job descriptions and develop performance standards for all EEO officials, including EEO counselors.
EEOO 30 Sep 79

1.6.6.5 Prepare an EEO regulation, and update TSARCOMR 10-1 on mission and functions.
EEOO 30 Sep 79
## APPENDIX C

### OBJECTIVES/ACTION ITEMS

1. **Area of Concern:** Organization and Resources (continued)

1.6 **Problem Statement:**

1.6.6 **Objective:**

**Responsible Official:**

**Target Date:**

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
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</thead>
<tbody>
<tr>
<td>1.6.6.6 Design a system for developing EEO plan of action items that can be used by any supervisor or employee in alignment with the zero-based budgeting concept.</td>
<td>EEOO</td>
<td>31 May 79</td>
</tr>
<tr>
<td>1.6.6.7 Study the possibility for using word processing capability for typing the plan of action, standard-format complaint letters and other reports to relieve the constant typing backlog.</td>
<td>EEOO</td>
<td>30 Jun 79</td>
</tr>
</tbody>
</table>
### OBJECTIVES/ACTION ITEMS

1. **Area of Concern:** Organization and Resources (continued)

1.6 **Problem Statement:**

1.6.6 **Objective:**

Responsible Official:

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.6.6.8 Publish a quarterly TSARCOM EEO bulletin.</td>
<td>EEOO</td>
<td>31 May 79</td>
</tr>
<tr>
<td>1.6.6.9 Review job labor codes to assure that all areas of EEO management resources are tracked.</td>
<td>EEOO</td>
<td>31 Jul 79</td>
</tr>
<tr>
<td>1.6.6.10 Develop a 1979 Calendar of EEO Events for publication in the Gateway Reporter.</td>
<td>HEPC</td>
<td>30 Mar 79</td>
</tr>
</tbody>
</table>
OBJECTIVES/ACTION ITEMS

2 Area of Concern: Discrimination Complaints

2.1 Problem Statement: Some EEO counselors experienced unnecessary delay in receiving required training; therefore, utilization of their services was delayed.

2.1.1 Objective: To provide basic EEO counseling training to newly appointed counselors.

Responsible Official: EEO
Target Date: 30 March 1979

Affirmative Actions: Responsible Target
Official Date

2.1.1.1 Nominate all newly appointed EEO counselors to attend USCSC basic EEO counseling.

Responsible Official: SUPV
Target Date: 30 Mar 79

2.1.1.2 Conduct monthly meetings with EEO counselors to advise them of current trends, evaluate their performance, increase abilities to resolve complaints informally.

Responsible Official: EEOS
Target Date: 28 Feb 79 (and monthly thereafter)
OBJECTIVES/ACTION ITEMS

2 Area of Concern: Discrimination Complaints

2.2 Problem Statement: EEO counselors have not received letters of appreciation or other type recognition for their counseling services.

2.2.2 Objective: Evaluate and document the performance of EEO counselors to credit their performance and grant appropriate recognition.

Responsible Official: EEOO

Target Date: 31 January 1979

Affirmative Actions: Responsible Official Target Date

2.2.2.1 Establish procedures for rating counselors. EEOO 31 Jan 79

2.2.2.2 Notify EEOO 30 calendar days before performance rating due date. CPD 31 Jan 79 (and continuing)

2.2.2.3 Include counselors' ratings in annual performance ratings. EEOO 31 Jan 79

2.2.2.4 Develop an EEO Complaint Timetable to track complaint progression and analyze processing effectiveness. EEOO 30 Mar 79
OBJECTIVES/ACTION ITEMS

3 Area of Concern: Recruitment

3.1 Problem Statement: Minorities and women are underrepresented in grades GS-11 to GS-15.

3.1.1 Objective: To achieve a balanced representation of minorities and women in grades GS-11 to GS-15.

Responsible Official: EEOO

Target Date: 30 July 1979

Affirmative Actions: 

3.1.1.1 Review job referral lists C, R&P 31 Oct 78 (Continuos) to determine career fields/ grades to which insufficient numbers of minority and women candidates are being referred.

3.1.1.2 Publicize anticipated job opportunities in grades GS-11 and above, in the Federal Times, La Mesa Redonda and Women In Action publications, and with the Urban League and other organizations with sizable minority and women memberships.

3.1.1.3 [Further actions listed, but not fully transcribed in this image]
OBJECTIVES/ACTION ITEMS

3 Area of Concern: Recruitment (continued)

3.1 Problem Statement:

3.1.1 Objective:

Responsible Official:
Target Date:

Affirmative Actions: Responsible Official Target Date

3.1.1.3 Publicize TSARCOM employment opportunities at military personnel separation centers. C, R&P 30 Apr 79

3.1.1.4 Maintain close coordination with CPD (R&P) in the achievement of organizational goals shown at Appendix 1 to this part. DIRs 30 Nov 78 (continuous)

3.1.1.5 Report to the EFOO the status of accomplishing the organization goals shown at Appendix 1 to this part. DIRs 15 Apr 79 (Quarterly)
OBJECTIVES/ACTION ITEMS

3 Area of Concern: Recruitment (continued)

3.1 Problem Statement:

3.1.1 Objective:

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1.1.6 Analyze assessment outlined in Part &quot;C&quot; of this plan.</td>
<td>DIRs</td>
<td>15 Apr 79</td>
</tr>
<tr>
<td>3.1.1.7 Analyze work force composition, make assessment of progress made during FY 79 and establish realistic goals to reduce or eliminate imbalances during FY 80. (See Appendix I to Part D.)</td>
<td>DIRs</td>
<td>31 Jul 79</td>
</tr>
</tbody>
</table>
OBJECTIVES/ACTION ITEMS

3 Area of Concern: Recruitment

3.2 Problem Statement: Hispanics are underrepresented in the work force.

3.2.2 Objective: To improve the employment profile of Hispanics.

Responsible Official: EEOO

Target Date: 30 September 1979

Affirmative Actions: Responsible Target
Official Date

3.2.2.1 Seek assistance from local Hispanic organizations in identifying and encouraging applicants to apply for job vacancies.

HEPC 28 Feb 79

3.2.2.2 Use a CO-OP agreement as a means to place Hispanics in the work force.

HEPC 31 Mar 79
APPENDIX C

OBJECTIVES/ACTION ITEMS

3 Area of Concern: Recruitment

3.3 Problem Statement: Though patterns of progression have been developed within most major directorates, a very limited number of local intern positions have been established in career program series.

3.3.3 Objective: To establish local intern positions with a view to (1) meeting future manpower requirements, (2) creating additional avenues of progression, and (3) providing opportunities for TSARCOM employees.

Responsible Official: CPO

Target Date: 30 September 1979

Affirmative Actions:  

<table>
<thead>
<tr>
<th>Action</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3.3.1 Initiate and complete survey of DIRs/OCs/CDRs on establishment and use of local intern positions (CPR 950-1, Chapter 4-4d).</td>
<td>CPO</td>
<td>30 Apr 79</td>
</tr>
<tr>
<td>3.3.3.2 Report survey findings to CDR.</td>
<td>CPO</td>
<td>15 May 79</td>
</tr>
<tr>
<td>3.3.3.3 Develop and finalize plan to implement a local intern program in compliance with CPR 950-1, Chapter 4-4d, and as supplement to the DARCOM intern program.</td>
<td>CPO</td>
<td>30 Apr 79</td>
</tr>
<tr>
<td>3.3.3.4 Encourage positive participation by minorities and women so that DARCOM goals for recruitment/placement in local intern career programs may be met as follows:</td>
<td>CDRs/DIRs/OCs</td>
<td>31 May 79</td>
</tr>
</tbody>
</table>

- Non-Engineer & Scientist Career Series
  - Minorities 17%
  - Women 30%

- Engineer & Scientist Career Series
  - Minorities 12%
  - Women 10%
## OBJECTIVES/ACTION ITEMS

### Area of Concern:

### Problem Statement:

### Objective:

<table>
<thead>
<tr>
<th>Objective</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3.3.5 Identify positions, advertise and select the best qualified employees.</td>
<td>CPO</td>
<td>30 Jun 79</td>
</tr>
<tr>
<td>3.3.3.6 Provide for a continuing input into local intern positions.</td>
<td>CDRs/ DIRs/ OCs</td>
<td>30 Mar 79/ 30 Sep 79</td>
</tr>
<tr>
<td>3.3.3.7 Incorporate consideration of local intern positions in deliberations of the TSARCOM Hiring Review Board.</td>
<td>Chair, Compt</td>
<td>30 Apr 79</td>
</tr>
</tbody>
</table>
## APPENDIX C

### OBJECTIVES/ACTION ITEMS

4 Area of Concern: Full Utilization of Skills and Training

4.1 Problem Statement: No determination has been made as to whether differentials exist relative to time-in-grade by minority status and sex.

4.1.1 Objective: To determine whether there are differentials in time-in-grade by minority status and sex.

Responsible Official: EEOO

Target Date: 31 July 1979

<table>
<thead>
<tr>
<th>Affirmative Actions:</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1.1.1 Conduct surveys to determine the average time-in-grade and determine if variance exists between minorities, women and nonminority employees.</td>
<td>HEPC</td>
<td>30 Jun 79</td>
</tr>
<tr>
<td>4.1.1.2 Brief the commander on findings.</td>
<td>EEOO</td>
<td>31 Jul 79</td>
</tr>
<tr>
<td>4.1.1.3 Provide results of survey to CPD, DIRs/OCs for appropriate action as required.</td>
<td>EEOO</td>
<td>31 Jul 79</td>
</tr>
</tbody>
</table>
OBJECTIVES/ACTION ITEMS

4 Area of Concern: Full Utilization of Skills and Training

4.2 Problem Statement: A full range of career counseling service, particularly for noncareer employees, should be provided.

4.2.2 Objective: To provide noncareer employees with an understanding of various career opportunities and how best to prepare themselves for these opportunities.

Responsible Official: CPD
Target Date: 31 May 1979

Affirmative Actions: Responsible Target
Official Date

4.2.2.1 Conduct special training classes for managers and supervisors in career counseling.

4.2.2.2 Conduct career program orientation sessions for noncareer employees (for each career program) in which there are 50 or more career registrants.
APPENDIX C

OBJECTIVES/ACTION ITEMS

4

Area of Concern: Full Utilization of Skills and Training

4.3

Problem Statement: Training statistics must be maintained to determine if training opportunities are available to all employees.

4.3.3

Objective: To ensure that training opportunities are available on an equitable basis to minorities and women.

Responsible Official: EEOO

Target Date: 31 July 1979

Affirmative Actions:

<table>
<thead>
<tr>
<th>Action Item</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.3.3.1</td>
<td>Study training data to determine the minority status, sex and grade level of employees who have received training, and determine reasons for any differentials between employee groups.</td>
<td>EEOO</td>
</tr>
<tr>
<td>4.3.3.2</td>
<td>Provide DIRs/OCs with evaluation analyses for appropriate action where necessary.</td>
<td>EEOO</td>
</tr>
</tbody>
</table>
4. Area of Concern: Full Utilization of Skills and Training (continued)

4.3 Problem Statement:

4.3.3 Objective:

Responsible Official:

Target Date:

Affirmative Actions: Responsible Target
Official Date

4.3.3.3 Provide developmental DIRs/OCs 31 Jan 79 opportunities to minorities and women in grade
GS-12 so that they may qualify for consideration for MARED or other high-level positions.

4.3.3.4 Develop a plan of action PT&FD 30 Jun 79 to continue focus on improving TSARCOM participation in the MARED program in 1979.

4.3.3.5 Counsel and encourage each SUPV eligible employee to participate in the MARED program.

28 Feb 79
APPENDIX C

OBJECTIVES/ACTION ITEMS

4 Area of Concern: Full Utilization of Skills and Training

4.4 Problem Statement: The Federal Women's program needs greater emphasis.

4.4.4 Objective: To increase emphasis on the FWP through informational and awareness-type training.

Responsible Official: FWPM
Target Date: 31 March 1979

Affirmative Actions:

4.4.4.1 Present monthly "Lunch and Learn" training/informational sessions during the fiscal year.

4.4.4.2 Sponsor at least one DIRs/OCs "Lunch and Learn" session during the fiscal year through each TSARCOM FWP committee representative.

Responsible Official
Target Date
4 Area of Concern: Full Utilization of Skills and Training (continued)

4.4 Problem Statement:

4.4.4 Objective:

Responsible Official:

Target Date:

Affirmative Actions: Responsible Official Target Date

4.4.4.3 Research availability of materials needed, cost and employee interest in and use of a TSARCOM Federal Women's Program Library. FWPM 31 Jan 79

4.4.4.4 Submit proposal to EEOC and commander for approval. FWPM 15 Apr 79

4.4.4.5 Assure that FWP committee representatives have valid input into development of DIR's/OC's EEO action plans and direct access to DIRs/OCs. FWPM 1 Mar 79 (monthly thereafter)
APPENDIX C

OBJECTIVES/ACTION ITEMS

4 Area of Concern: Full Utilization of Skills and Training

4.5 Problem Statement: Complete training statistics and costs (including TDY costs) are not readily available to fulfill reporting requirements.

4.5.5 Objective: To fully comply with reporting requirements of form RCS-1046-CSC-SA, Report of EEO Program Progress.

Responsible Official: CPD

Target Date: 31 May 1979

Affirmative Actions:

<table>
<thead>
<tr>
<th>Action</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.5.5.1 Contact appropriate DA office to clarify distribution of the nine-part DA report and use of percentages, and identify if costs portion includes TDY.</td>
<td>C, T&amp;D</td>
<td>30 Mar 79</td>
</tr>
<tr>
<td>4.5.5.2 Coordinate with DA to obtain a full set of DA reports on a quarterly basis.</td>
<td>C, T&amp;D</td>
<td>30 Apr 79</td>
</tr>
<tr>
<td>4.5.5.3 Seek to have information developed from Comptroller or T&amp;D records, if available, should TDY costs not be available from DA reports.</td>
<td>C, T&amp;D</td>
<td>31 May 79</td>
</tr>
</tbody>
</table>
### OBJECTIVES/ACTION ITEMS

#### 4 Area of Concern: Full Utilization of Skills and Training

4.6 Problem Statement: Action is needed to increase representation of minority and women in the HQDA and DARCOM administered Long-Term Training (LTT) and Selected Educational Programs for Civilian Employees.

4.6.6 Objective: To increase participation in LTT by encouraging eligible minorities and women to participate in subject program.

<table>
<thead>
<tr>
<th>Affirmative Actions:</th>
<th>Responsible Official:</th>
<th>Target Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.6.6.1 Contact each eligible employee, including minorities and women, inform them of the program and encourage submission of applications.</td>
<td>D, PT&amp;FD</td>
<td>30 Sep 79</td>
</tr>
</tbody>
</table>
OBJECTIVES/ACTION ITEMS

4 Area of Concern: Full Utilization of Skills and Training

4.7 Problem Statement: Action is needed to insure that all employees fully understand how to complete the DRSTS Form 1050, Supplemental Experience Statement, along with how the form is used in the rating process.

4.7.7 Objective: To provide understanding of the rating process to supervisors, employees and promotion panel raters.

Responsible Official: D, PT&FD
Target Date: 30 June 1979

Affirmative Actions: Responsible Official Date

4.7.7.1 Conduct employee briefings C, R&P Br 30 Jun 79
to explain how to complete the DRSTS Form 1050 and its use in the rating process.

4.7.7.2 Provide a brief narrative definition for each SKAP as well as instructions on how to fill out the DRSTS Form 1050 on job vacancy announcements.
### OBJECTIVES/ACTION ITEMS

<table>
<thead>
<tr>
<th>Area of Concern: Full Utilization of Skills and Training (continued)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4.7 Problem Statement:</strong></td>
</tr>
<tr>
<td><strong>4.7.7 Objective:</strong></td>
</tr>
<tr>
<td>Responsible Official:</td>
</tr>
<tr>
<td>Target Date:</td>
</tr>
<tr>
<td><strong>Affirmative Actions:</strong></td>
</tr>
<tr>
<td>C, R&amp;P Br</td>
</tr>
<tr>
<td><strong>4.7.7.3 Conduct briefing sessions in the supervisor's role in completing the DRSTS Form 1050.</strong></td>
</tr>
<tr>
<td><strong>4.7.7.4 Prepare written instructions to panel raters for use during the rating process and require panel raters to resolve or completely document any differences in ratings applied.</strong></td>
</tr>
<tr>
<td>C, R&amp;P Br</td>
</tr>
</tbody>
</table>
APPENDIX C  

OBJECTIVES/ACTION ITEMS

4 Area of Concern: Full Utilization of Skills and Training

4.8 Problem Statement: There is an inability to readily impanel subject matter experts for personnel rating/ranking panels which are representative of a broad spectrum of the workforce.

4.8.8 Objective: Insure that personnel rating/ranking panel include minorities and women.

Responsible Official: D, PT&FD

Target Date: 30 April 1979

Affirmative Actions: Responsible Target
Official Date

4.8.8.1 Submit proposed list of subject matter experts to serve on rating/ranking panels upon request of staffing specialist.
OBJECTIVES/ACTION ITEMS

5 Area of Concern: Upward Mobility

5.1 Problem Statement: The number of employees presently in the Upward Mobility Program (UMP) does not significantly contribute to meeting overall affirmative action goals and objectives.

5.1.1 Objective: To increase the total number of employees in the Upward Mobility Program to a minimum of 40.

Responsible Official: CPD
Target Date: 30 September 1979

Affirmative Actions: Responsible Target
Official Date

5.1.1.1 Analyze current and projected needs in order
projected needs in order to determine the number
of occupational series

5.1.1.2 Identify current and projected position
vacancies which are appropriate for UMP,
and re-engineer or restructure, as appropriate.

5.1.1.3 Develop plan for pertinent on-the-job and formal
development and training experiences required for
progression, as necessary, and budget accordingly.

108
## OBJECTIVES/ACTION ITEMS

**Area of Concern: Upward Mobility (continued)**

### 5.1 Problem Statement:

### 5.1.1 Objective:

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1.1.4 Develop plan for pertinent on-the-job and formal development and training experiences required for progression, as necessary, and budget accordingly.</td>
<td>C, T&amp;D</td>
<td>31 Mar 79</td>
</tr>
<tr>
<td>5.1.1.5 Submit recruitment actions.</td>
<td>DIRs</td>
<td>15 May 79</td>
</tr>
<tr>
<td>5.1.1.6 Develop pertinent crediting plans for selection of employees, and announce positions.</td>
<td>C, R&amp;P</td>
<td>15 May 79</td>
</tr>
<tr>
<td>5.1.1.7 Make selections and submit to EEO office for review.</td>
<td>DIRs</td>
<td>30 Jun 79</td>
</tr>
</tbody>
</table>
OBJECTIVES/ACTION ITEMS

5 Area of Concern: Upward Mobility (continued)

5.1 Problem Statement:

5.1.1 Objective:

Responsible Official:
Target Date:

Affirmative Actions: Responsible Target
Official Date

5.1.1.8 Prepare individual DIRs 15 Jul 79
training plans.

5.1.1.9 Prepare DIRs quarterly 80 to 100 days
evaluations of trainee from selec-
activities and progress, tion or
submit reports through from previous
the EEOO and UMP report
coordinator to C, T&D.

5.1.1.10 Review records, progress UMP Coord
and assess overall 30 Sep 79
program status.
OBJECTIVES/ACTION ITEMS

5 Area of Concern: Upward Mobility

5.2 Problem Statement: There is no booklet which provides specific guidance to employees on Upward Mobility.

5.2.2 Objective: To develop a booklet on Upward Mobility which will provide a comprehensive guide to career planning for employees.

Responsible Official: CPD

Target Date: 30 June 1979

Affirmative Action: Responsible Official Target Date

5.2.2.1 Develop, reproduce and distribute an employee booklet on Upward Mobility. UMPC 30 Jun 79
OBJECTIVES/ACTION ITEMS

6 Area of Concern: Supervisory and Management Commitment

6.1 Problem Statement: A new approach to EEO training is needed for FY 1979.

6.1.1 Objective: To create a new training approach.

Responsible Official: EEOO
Target Date: 30 September 1979

Affirmative Actions:

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1.1 Develop new EEO training course for supervisors.</td>
<td>EEOO</td>
<td>31 Mar 79</td>
</tr>
</tbody>
</table>
APPENDIX C  TSARCOM PAM 690-2

OBJECTIVES/ACTION ITEMS

6 Area of Concern: Supervisory and Management Commitment

6.2 Problem Statement: Limited efforts are being made toward resolution of complaints of discrimination at the informal stage.

6.2.2 Objective: To timely and properly consider employee complaints of discrimination and resolve at the informal stage.

Responsible Official: EEOO
Target Date: 30 September 1979

Affirmative Actions: Responsible Official Target Date

6.2.2.1 Cooperate with EEO counselors and employees by discussing problems in a nonthreatening, nondefensive manner, and offer solution(s) to the employee and management. SUPV 1 Oct 78 (& continuing thereafter)

6.2.2.2 Cooperate with USACARO investigators and USCSC complaints examiners by providing employee/organization/record data requested and/or attendance at complaints examiner's hearings. SUPV 1 Oct 78 (& continuing thereafter)
OBJECTIVES/ACTION ITEMS

6 Area of Concern: Supervisory and Management Commitment (continued)

6.2 Problem Statement:

6.2.2 Objective:

Responsible Official:
Target Date:

Affirmative Actions: | Responsible Official | Target Date
---|---|---
6.2.2.3 Review effectiveness of above actions, report accomplishments at quarterly Review & Analysis, and provide report to the EEOO. | DIRs/OCs | 30 Apr 79 (& quarterly thereafter)
APPENDIX C

OBJECTIVES/ACTION ITEMS

6

Area of Concern: Supervisory and Management Commitment

6.3

Problem Statement: Supervisory and managerial personnel are not sufficiently involved in problem identification and establishing of objectives in the directorate and office EEO affirmative action plans.

6.3.3

Objective: To involve all managers and supervisors in affirmative action planning for their respective directorate and office.

Responsible Official: EEOO

Target Date: 31 July 1979

Affirmative Actions: Responsible Target

6.3.3.1 Analyze work force, DIRs/OCs 31 Mar 79
identify problems, and (quarterly submit specific actions in thereafter)
support of affirmative action (section, branch and division chiefs).

6.3.3.2 Provide report on DIRs/OCs 30 Apr 79
directorate/office AAP at the Review & Analysis, with copy to the EEOO.
OBJECTIVES/ACTION ITEMS

6 Area of Concern: Supervisory and Management Commitment (continued)

6.3 Problem Statement:

6.3.3 Objective:

Responsible Official:

Target Date:

Affirmative Actions: Responsible Official Target Date

6.3.3.3 Arrange training for all directors, managers, supervisors, EEO advisory group, and committees in "EEO Affirmative Action Planning", sponsored by the USCSC.

C, T&D 30 Apr 79

6.3.3.4 Interview supervisors during EEO assistance visits to determine supervisory involvement in developing/monitoring the AAP.

EEOO 31 Jul 79
APPENDIX C

OBJECTIVES/ACTION ITEMS

6 Area of Concern: Supervisory and Management Commitment

6.4 Problem Statement: Special recognition of deserving individuals for their EEO contributions should be increased.

6.4.4 Objective: To recognize outstanding contributions and support given to the TSARCOM EEO Program.

Responsible Official: CPD

Target Date: 31 July 1979

Affirmative Actions: Responsible Target

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Official</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.4.4.1 Provide supervisory personnel with updated guidance on how to effectively utilize awards to acknowledge outstanding contributions to the TSARCOM EEO Program.</td>
<td>C, MER</td>
<td>15 May 79</td>
</tr>
<tr>
<td>6.4.4.2 Recognize those supervisors DIRs/OCs who have contributed significantly to the concept of assuring EEO to all.</td>
<td>DIRs/OCs</td>
<td>31 Jul 79</td>
</tr>
</tbody>
</table>
OBJECTIVES/ACTION ITEMS

6 Area of Concern: Supervisory and Management Commitment

6.5 Problem Statement: Minority employees are not receiving performance awards in proportion to their representation in the work force.

6.5.5 Objective: To increase the percentage of performance awards granted to minority employees in proportion to work force representation.

Responsible Official: CPD
Target Date: 30 September 1979

Affirmative Actions: Responsible Target
Official Date

6.5.5.1 Review and evaluate performance award nominations made by subordinate managers and supervisors to insure that deserving minority employees are included.

6.5.5.2 Develop comparative progress reports on awards in the quarterly Review & Analysis, and submit copy to the EEOO.

6.5.5.3 Affirmative Actions: Responsible Target
Official Date

6.5.5.4 Affirmative Actions: Responsible Target
Official Date

6.5.5.5 Affirmative Actions: Responsible Target
Official Date
## APPENDIX C

### OBJECTIVES/ACTION ITEMS

**6**  
**Area of Concern:** Supervisory and Management Commitment

**6.6**  
**Problem Statement:** Minority (6.1%) and female (4.2%) employees are underrepresented in managerial and supervisory positions at grades GS-12 and above.

**6.6.6**  
**Objective:** To increase minority and female workforce representation in supervisory/managerial positions by .6% (2) and .9% (3), respectively.

**Responsible Official:** EEOO

**Target Date:** 31 August 1979

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.6.6.1 Determine if a sufficient number of minorities and women are developed to assume supervisory/managerial positions, and registered in DA Career Programs to increase their opportunities.</td>
<td>DIRs/OCs</td>
<td>15 Apr 79 31 Aug 79</td>
</tr>
<tr>
<td>6.6.6.2 Maximize use of pre-executive development opportunities to reflect qualified high potential minorities and women.</td>
<td>DIRs/OCs</td>
<td>31 Mar 79</td>
</tr>
</tbody>
</table>
OBJECTIVES/ACTION ITEMS

6.7 Area of Concern: Supervisory and Management Commitment

6.7.7 Problem Statement: No specific standards have been developed and approved for rating TSARCOM managers and supervisors in EEO.

6.7.7 Objective: To develop standards so that the rating of managers and supervisors in EEO may be uniformly applied throughout TSARCOM.

Responsible Official: EEOO
Target Date: 30 September 1979

Affirmative Actions: Responsible Official Target Date

6.7.7.1 Develop EEO standards for managers and supervisors which will meet DARCOM guidance and coordinate action with CPO. EEOO 30 Apr 79

6.7.7.2 Brief command group. EEOO 15 Jun 79

6.7.7.3 Staff standards for review by directors and office chiefs. EEOO 30 Jun 79
OBJECTIVES/ACTION ITEMS

6 Area of Concern: Supervisory and Management Commitment (continued)

6.7 Problem Statement:

6.7.7 Objective:

Responsible Official:

Target Date:

Affirmative Actions: Responsible Target

Official Date

6.7.7.4 Review comments from staff elements and finalize EEO standards. EEOO 31 Jul 79

6.7.7.5 Publish standards with pertinent instructions on their use under the new DA Performance Appraisal System. EEOO 30 Sep 79
OBJECTIVES/ACTION ITEMS

Area of Concern: Community Outreach

7.1 Problem Statement: Some available special employment programs are not used at TSARCOM.

7.1.1 Objective: To provide special employment and training opportunities for persons who are economically or educationally disadvantaged.

Responsible Official: D, PT&FD
Target Date: 30 September 1979

Affirmative Actions:

<table>
<thead>
<tr>
<th>Action Description</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Establish a Worker-Trainee Opportunities Program for the command.</td>
<td>D, PT&amp;FD</td>
<td>1 Apr 79</td>
</tr>
<tr>
<td>Review the needs for lower level positions and fully utilize the Worker-Trainee Opportunities Program.</td>
<td>SUPV</td>
<td>30 Apr 79</td>
</tr>
</tbody>
</table>
APPENDIX C

OBJECTIVES/ACTION ITEMS

7 Area of Concern: Community Outreach (continued)

7.1 Problem Statement:

7.1.1 Objective:

Responsible Official:

target Date:

Affirmative Actions: Responsible Target
Official Date

7.1.1.3 Make use of the worker-trainee registers to
assure that minorities and women are hired into
developmental GS-01 and GS-02 positions with
specified target jobs. (These are not considered
upward mobility positions.)

7.1.1.4 Construct individual
development plans for
each worker-trainee to
prepare them for full
performance levels in
target positions identi-
fied.

SUPV 31 Jul 79

C, T&D Br 1 Jul 79
OBJECTIVES/ACTION ITEMS

Area of Concern: Community Outreach (continued)

7.1 Problem Statement:

7.1.1 Objective:

Responsible Official: 
Target Date:

Affirmative Actions: Responsible Official Target Date

7.1.1.5 Encourage those trainees who have not completed high school to enroll in classes for GED certificates. 
SUPV 1 Aug 79

7.1.1.6 Schedule on-post classes if the response for GED includes 15 or more trainees.
C, T&D Br 31 Aug 79
APPENDIX C

OBJECTIVES/ACTION ITEMS

8 Area of Concern: Program Evaluation

8.1 Problem Statement: Data analysis of personnel actions are incomplete.

8.1.1 Objective: To obtain sufficient raw data from which a complete analysis of the EEO Program can be made.

Responsible Official: EEOO

Target Date: 31 August 1979

Affirmative Actions: Responsible Target Date

8.1.1.1 Report all promotions, DIRs/OCs 30 Jun 79 training and awards (performance and honorary) by DIRs/OCs 31 Aug 79 major occupational group (professional, managerial, suspension and grade to the supervisory) EEOO.

8.1.1.2 Report personnel gains and DIRs/OCs 30 Jun 79 losses (to TSARCOM) 31 Aug 79 suspensions, adverse actions, and formal grievances by employee name, position, series and grade to the EEOO.
OBJECTIVES/ACTION ITEMS

Area of Concern: Program Evaluation

8.2 Problem Statement: EEO Program evaluation needs to be improved and done on a monthly basis.

8.2.2 Objective: To coordinate and evaluate program efforts.

Responsible Official: EEOO
Target Date: 30 September 1979

Affirmative Actions:

<table>
<thead>
<tr>
<th>Affirmative Actions</th>
<th>Responsible Official</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.2.2.1 Conduct monthly meetings with CPD, to include branch chiefs and EEOAO, and EEO officials for the purpose of coordinating and evaluating program efforts.</td>
<td>CPD</td>
<td>28 Feb 79</td>
</tr>
</tbody>
</table>
## APPENDIX D

### Section A: Summary of Manpower

| Work Unit | Civilian Employees Served | Alloc. in St. A. | Actual Rank-
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Grade</td>
</tr>
<tr>
<td>551-1010</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Section B: Performance Data

<table>
<thead>
<tr>
<th>Year and Month</th>
<th>Average Person Months Worked</th>
<th>Total Manpower</th>
<th>Manpower Allocated</th>
<th>Work Load</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Section C: Manpower

<table>
<thead>
<tr>
<th>Rank for Grade</th>
<th>Number of Person Months Worked</th>
<th>Total Manpower</th>
</tr>
</thead>
<tbody>
<tr>
<td>GS-15</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>GS-12</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>GS-17</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>GS-5</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

### Other Manpower

<table>
<thead>
<tr>
<th>Rank for Grade</th>
<th>Number of Person Months Worked</th>
<th>Total Manpower</th>
</tr>
</thead>
<tbody>
<tr>
<td>GS-21</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>GS-22</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>

### Section D: Summary of Manpower

| Work Unit | Civilian Employees Served | Alloc. in St. A. | Actual Rank-
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Grade</td>
</tr>
<tr>
<td>551-1010</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. Yardstick Code 551-1010 is applicable to this function. However, this Directorate is the only one in the Army that conducts Operational and Major Command staff functions; it is also responsible for processing EEO complaints involving DA Staff Agency Heads, Army Career Program Management Functional Chiefs and Major Commanders Army-wide. The work projects and estimated man-hours shown in this Section represents local performance factors more appropriate to the staffing needed for this Directorate than the DA Yardstick.

2. The work projects listed below are considered essential for a more effective Equal Employment Opportunity program in support of 11,500 civilian employees serviced.

<table>
<thead>
<tr>
<th>Work Projects</th>
<th>Est. Man-Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Complaints Branch</strong></td>
<td></td>
</tr>
<tr>
<td>1. Counsel with and provide information to aggrieved employees on matters that are not directly related to EEO.</td>
<td>408</td>
</tr>
<tr>
<td>2. Prepare monthly reports.</td>
<td>12</td>
</tr>
<tr>
<td>3. Supervise EEO Counselors (Collateral) to include:</td>
<td></td>
</tr>
<tr>
<td>a. Pre-complaint counseling</td>
<td>18</td>
</tr>
<tr>
<td>b. EEOC training and development</td>
<td>3</td>
</tr>
<tr>
<td>c. Changes in regulation and policy</td>
<td>1</td>
</tr>
<tr>
<td>d. Pre-complaint reporting system</td>
<td>0</td>
</tr>
<tr>
<td>4. Process formal EEO complaints to include:</td>
<td></td>
</tr>
<tr>
<td>a. Reviewing complaint and subsequent correspondence and reports from the complainant, investigator, activity commander, CFO, AF, OCS and in some cases the complainant's attorney, members of Congress and the White house.</td>
<td>37</td>
</tr>
<tr>
<td>b. Prepare correspondence and reports to the above persons.</td>
<td>37</td>
</tr>
<tr>
<td>c. Coordinate via telephone, TWX and letters; responses and decisions.</td>
<td>37</td>
</tr>
<tr>
<td>d. Interview appropriate persons.</td>
<td>37</td>
</tr>
</tbody>
</table>
Description of Work Performed (Cont.):

Women's, Hispanic and other special emphasis programs. Provides active staff leadership for the EEO Program. Serves as principal advisor to the Commander AOM, Agency Heads of the DA-Staff and other key management officials of cross service activities on EEO matters. Conducts special studies, and maintains close liaison with the Command Civilian Personnel Officer and the four operating Civilian Personnel Offices to assure that Civilian personnel programs comply with EEO requirements. Managers and administers the informal and formal EEO complaint process associated with individual and class action complaints involving Agency Heads of the DA Staff, Major Army Commanders, Career Program Functional Chiefs (DA), and other Army-wide subordinate activities of the Army Staff components. Coordinates the formulation and implementation of the Command EEO Plan of Action and the Affirmative Action Program. Makes staff visits to serviced commands/agencies and represents the Command/DA-Staff-at-Duty, Federal Agencies, labor unions and community meetings pertaining to EEO. Conducts special studies, evaluates program progress, identifies areas requiring improvement and develops measures to correct employment discrimination based on race, color, religion, sex, age, national origin, mental and physical handicaps. Gathers statistics, prepares and submit required reports and summaries of actions to assist in the evaluation and implementation of the Affirmative action program.
### Work Projects (Cont.)

#### Complaints Branch (Cont.)

<table>
<thead>
<tr>
<th>Task Description</th>
<th>Est. Man-Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>e. Brief Commanders- and Agency heads.</td>
<td>18.5</td>
</tr>
<tr>
<td>f. Set up, chair and prepare minutes for adjustment meetings.</td>
<td>74</td>
</tr>
<tr>
<td>g. Provide advice to complainants, supervisors, Commanders and Agency heads.</td>
<td>15.4</td>
</tr>
<tr>
<td>h. Travel to other activities.</td>
<td>296</td>
</tr>
<tr>
<td>i. Maintains intra-office tracking/reporting system.</td>
<td>0</td>
</tr>
<tr>
<td>5. Conduct inquiries and prepare the report on complaints of reprisal.</td>
<td>50</td>
</tr>
<tr>
<td>6. Conduct briefings and orientations on the EEO complaint system.</td>
<td>30</td>
</tr>
<tr>
<td>7. Provide administrative and logistical support for investigators and hearing examiners.</td>
<td>16.6</td>
</tr>
<tr>
<td>8. Compile statistical data on EEO complaints.</td>
<td>6</td>
</tr>
<tr>
<td>9. Inform employees and management of changes in EEO reg. and policy through briefings, news paper article memos, etc.</td>
<td>.5</td>
</tr>
<tr>
<td>10. Provide input to Plans and Evaluation Group for incorporation in AAF, Newsletter, regulations, and special reports.</td>
<td>6</td>
</tr>
<tr>
<td>11. Answer routine telephone requests for information.</td>
<td>693.3</td>
</tr>
<tr>
<td>12. Provide administrative and logistical support for EEO Specialists.</td>
<td>1,040**</td>
</tr>
</tbody>
</table>
SECTION D - Specific Remarks (Cont)

Work Projects (Cont.)

Complaints Branch (Cont.)

13. Supervise and direct activities of Complaint Branch.
14. Attend training courses and conferences. 40
15. Attend staff meetings. 104
16. Travel in association with duties. 40

TOTAL:

AFFIRMATIVE ACTION BRANCH

Evaluation and Plans Branch

1. Prepare, develop, coordinate, implement and monitor Command Affirmative Action 1000
2. Assist Commanders/agencies in developing and implementing their plans of action and revisions thereto- 1000
3. Monitor plan implementations and participate in meetings, boards, etc., having input on affirmative action plan. 1000
4. Counsel managers and supervisors 200
5. Conduct briefings and orientation. 500
6. Attend briefings, orientations and training sessions. 144
7. Prepare correspondence, replies and policy papers. 400
8. Research data. 400
**APPENDIX D**

**Work Projects (Cont.)**

**Evaluation and Plans Branch (Cont.)**

9. Conduct inspections. ........................................... 288

10. Compile and analyze data and provide feedback. ........... 1500

11. Publish newsletter. ............................................ 200

12. Participate in community efforts to improve conditions which
affect minorities and women. ...................................... 416

13. Plan and coordinate special events (HEP week, Black
History, FWP). .................................................. 50

14. Prepare budget estimates and perform supply actions. .... 100

15. Perform edit tasks of regulatory directives. .............. 1000

16. Travel in association with duties. .......................... 1500

17. Supervise and direct activities of AAP & Evaluation Branch. 500

18. Answer routine telephone requests for information. ...... 2000

19. Provide administrative and logistical support for EEO Specialist. 2000

20. Conduct minority group data surveys. ...................... 400

21. Assist in establishing, implementing and monitoring the upward
mobility program. ................................................. 2080

22. Assess the effectiveness of service commander/agency heads in
identifying factors and problems bearing on EEO. .......... 1000

**TOTAL:** .................................................................... 7,048

**TOTAL:** .................................................................... 10,780
APPENDIX D

Work Projects

Special Emphasis Programs (Federal Women's, Hispanic, Mental and Physical Handicap)

1. Write affirmative action plans, establishes goals, objectives.
2. Prepare workforce evaluation, compile statistical analysis.
3. Provide leadership, administrative support to implement affirmative actions, tutorials.
4. Conduct training, briefings, orientations on FWP and HEP.
5. Prepare and staff all correspondence.
6. Provide guidance on the establishment of FWP, HEP, etc.
7. Provide career counseling to employees.
8. Act as focal point for serviced agencies to insure program implementation.
9. Establish relations with government, non-government organizations who are in consonance with affirmative action.
10. Attend professional meetings, seminars, workshops, etc.
11. Prepare news articles for the EEO Newsletter.

Est. Man-Hours

<table>
<thead>
<tr>
<th>Work Projects</th>
<th>500</th>
<th>1000</th>
<th>1000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Emphasis Programs (Federal Women's, Hispanic, Mental and Physical Handicap)</td>
<td>500</td>
<td>250</td>
<td>400</td>
</tr>
</tbody>
</table>
Work Projects (Cont.)

Special Emphasis Programs (Cont.)
(Federal Women's Hispanic, Mental
and Physical Handicap)

13. Chair or aide in activities to commemorate ethnic events,
e.g., Hispanic Week, Women's Week, Black History Month.


15. Act as training officer: Prepare training budget and
recommend execution of training priorities. Serve on the
training committee. Prepare training plan.

16. Serve as EEO representative on various boards, i.e., pro-
motion, career program, etc.

17. Responsible for program publicity.

18. Recruitment of females and minorities.

19. Provide counseling of outside applicants.

Est. Man-Hours

100
50
100
100
240
240
50
|---------|-------------------------|---------|------------|------------|--------------|-----------|-------------|----------|-----------------------------|-------------------------------|--------------|------------------------|------------------------|---------------------------------|
## APPENDIX E

### 17. RESULTS OF ACCOMPLISHMENT

<table>
<thead>
<tr>
<th># MATERIALS, ETC</th>
<th># HOURS COST</th>
<th># PERSONNEL</th>
<th># TRAVEL</th>
<th>TUTION</th>
<th># TOTAL COST</th>
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</table>

### 16. USED RESOURCES

<table>
<thead>
<tr>
<th># MATERIALS, ETC</th>
<th># HOURS COST</th>
<th># PERSONNEL</th>
<th># TRAVEL</th>
<th>TUTION</th>
<th># TOTAL COST</th>
</tr>
</thead>
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</table>

### 15. PROJECTED RESOURCES

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<tr>
<th># MATERIALS, ETC</th>
<th># HOURS COST</th>
<th># PERSONNEL</th>
<th># TRAVEL</th>
<th>TUTION</th>
<th># TOTAL COST</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>
APPENDIX E

DIRECTIONS FOR DEVELOPING EEO PROGRAM DECISION PACKAGE ITEM FOR ZERO-BASE PLANNING AND BUDGETING

This form is designed to simplify development of your EEO plan of action (POA), while at the same time it will promote complete control over POA implementation. The card stock upon which the form is printed is designed for No. 2 pencil use; do not type on the form. The form is planned for use by any employee or other concerned person who may want to present proposals for the POA. The following explanations are provided for each form item along with actual examples to assist you with item preparation which will be in conformance with the requirements of FPM Letter 713-40, Equal Employment Opportunity Plans.

1. ORIGINATING OFFICE: Insert the office code for the originating office.

2. RANKING - EEO: After items 4 through 15 are completed on all Decision Package Items (DPIs), the EEO office staff will rank them in priority order.

3. RANKING - COMMAND: The final ranking action for what will, or will not, be included in the POA will be decided by the commander. This item is placed on the upper right for quick reference purposes.

4. SECTION: Insert Roman numerals from I to VIII along with POA section titles as depicted in FPM Letter 713-40: I Organization and Resources, II Discrimination Complaints, III Recruitment, IV Full Utilization of Skills and Training, V Upward Mobility for Lower Level Employees, VI Supervisory and Management Commitment, VII Community Outreach, and VIII Program Evaluation. An example of your final numbering sequence is: 1 for Section, 2 for Assessment, 1. for Problem, a. for Objective, and (i) for Action.

5. ASSESSMENT: Print, or write legibly, your assessment of the problem situation. Be explicit; for instance, if your assessment is that supervisors/managers are not adequately supportive of POA efforts, explain why you think this to be so. Have you surveyed supervisory opinion on the subject? Perhaps that is the problem. Be careful not to start in the middle in assessing problems, but rather start from the beginning.

6. PROBLEM: For each problem stated there must be an objective. The assessment might elicit more than one problem.

7. OBJECTIVE: State the objective by starting with the word "To." The objective should answer the question, What? When all objectives for the assessment are completed number them, for example: 1 of 4, 2 of 4, etc. If extra space is needed the originator and/or reviewer should question that there might be two objectives instead of one.
APPENDIX E

8. ACTION: The action is one of the most difficult blocks to complete. The action must start with an active verb; there is no need to state the responsible official in the action item. Also, passive verbs should never be used. Qualifying statements such as, "when possible," should not be placed in an action statement. At the time the action is proposed, the action should be envisioned as feasible. If later circumstances preclude accomplishment, the non-completion can be justified. The action item must answer the question, How? After all action items have been prepared on different DPIs, number the actions. For example: 1 of 3, 2 of 3, 3 of 3. The Assessment need be written only once on the first Objective card. The Objective need be written only once on the first Action DPI in the group. Actions should be concise and not repeat the objective.

9. CONSEQUENCES OF INACTION: Be explicit. Cite directives or even laws, when applicable. If the impact is not completely known, be candid and say so. Perhaps during the proposal processing someone else can add to this, or any other, item.

10. INTERACTS WITH OTHER ACTIONS: Some actions in Resources and Organization, for instance, might interact with a Program Evaluation action, or an action in Recruitment might interact with Community Outreach. Simply state the Roman numeral section, objective and action number: VIII c(2).

11. TARGET DATE: If no Target Date can be set it is not an action item. If the action is already required by a regulation do not include it as a POA action. A target date can be written as "31 Dec, & quarterly thereafter," or "31 Mar & 30 Sep," or "30 Oct, & continuing thereafter." However, if no date can be set it is probably because the action has already been established as a recurring procedure and is, or should be, in a regulation. Items which are to be continued should be included in the EEO regulation upon expiration of the POA. This item is placed in the lower left for quick reference purposes.

12. RESPONSIBLE OFFICIAL: There can only be one responsible official. This is the person, either by name or office code, who is responsible for seeing that the action is carried out by the target date; this is the individual who saw the action in the planning stage and who fully accepts responsibility for implementing the action; this is the official whom the commander will hold responsible if the action is not completed; this is the employee who will get credit for accomplishing the action.

13. PARTICIPATING OFFICIAL(S): This is the one, or more, official whose help is needed in an official capacity to carry out the action.

14. ORIGINATOR'S INITIALS: This block could be used for initials, or name and phone number, whichever best serves your needs. This item is placed on the lower right for quick reference purposes.
APPENDIX E

15. PROJECTED RESOURCES: This action is placed on the reverse of the form, on the bottom, for a reason; funding should be literally the bottom line. When arranging DPIs for ranking, funding will be quickly visible. A narrative under Item 15 should describe who and what will be needed to accomplish the item, for example: The FWP Committee will be used to develop a Federal Women's Program week celebration.

Item a, Materials, etc./Cost, is designed to include miscellaneous expenses like cost for renting a film, or a stipend for a speaker, or compensatory time for participation in a community outreach event.

Item b, Hours/Cost, should include the projected hours it will take to complete the action. A standard average might be used here for salary computation. Then a cost can be computed and entered.

Item c, Personnel, should project the number of persons who might work on the item, if known.

Item d, Travel/Tuition, should include tuition, if any, and/or travel costs.

Item e, Total Cost, would be the bottom line for the DPI.

16. USED RESOURCES: This portion of the form will be completed when the item is accomplished. More, or less, resources might have been used in a through e than were projected.

17. RESULTS OF ACCOMPLISHMENT: This will be the last item completed. An analysis should be made at the time of an action completion which will describe how well the action was carried out and the impact the accomplishment had on the work force. The description should be cryptic, yet complete. When the new FPA is prepared this item will be used to prepare the Accomplishment Report. Semiannual publicity can be prepared from this DPI to let the work force, and the community, know about exceptional accomplishments.

After all proposed DPIs have been evaluated, tabulated, ranked and approved, they can be given to the typist to type the FPA. This will be the final copy which will be signed by the commander and the EEO officer. After the FPA is typed, the DPIs are taken out of Section sequence and placed in Target Date order by month, or perhaps quarter. They should then be placed in a binder for daily use by the EEO office staff. The Decision Package Binder (DPI) should be the management by objectives (MBO) bible for the EEO office staff. If other requirements are pressed upon the program during the life of the FPA, they should be written up as DPIs. It might be that some DPIs already approved will have to be dropped in favor of the new item; if so, the FPA should be amended to reflect the EEO program change. Finally, those ongoing EEO program requirements can be written up and inserted in the DPI for purposes of MBO for the total program. DPIs could be prepared, for instance, to track the cost for each individual involved in FPA preparation/coordination.
1. The Equal Employment Opportunity Office (EEOO) has not maintained work load/production man-hour records sufficient to allow a meaningful evaluation of manpower requirements. A system for recording actual man-hours expended and projected man-hours required has been devised and appears to be adequate, but has yet to be implemented. This work control/production system for recording work load data must be implemented and managed carefully so that proper data is produced for management analysis. Adequate work unit codes must also be devised and implemented so that man-hours can be allocated to the appropriate function/task. In this regard, the TSARCOM Methods and Standards Program should be used to the maximum extent. As a minimum, work unit codes should be developed and man-hours recorded in the following areas:

   a. EEO training of supervisors, managers, and employees as reported in RCS USCSC 1164.
   b. Preparation of training materiel.
   c. Development and dissemination of the EEO Plan of Action.
   d. Meetings or conferences relating to:
      (1) Internal meetings with various program related committees.
      (2) Community leaders and community committees related to the EEO Program.
   e. Processing of discrimination complaints (formal and informal) and precomplaint counseling by the EEO office personnel.
   f. Preparation and dissemination of program information to the work force, managers, and the labor market community.
   g. Support of the following programs, recorded separately:
      (1) Upward Mobility
      (2) Federal Women's Program
      (3) Hispanic Employment Program
      (4) Black Employment Program
APPENDIX F

(5) Employment of the Disadvantaged

2. Based on the information currently available, the following comments apply to the work load in EEO:

a. Some of the present work load in EEO is carried over from a time when two of the four authorized professional level positions (including the EEO Officer) were vacant. This "catch up" is not normal work load.

b. Some of the present work load involves the implementation of new ideas/systems. Implementation work load is generally more time consuming than program maintenance work load and this too is not normal work load.

c. Because of the nature of EEO functions, there is a great deal of clerical/administrative work load associated with EEO. The recent acquisition of a Mag Card Typewriter for the EEO Office and the establishment of the Automated Administrative Support Center will do much to relieve the burden on the EEOO clerical staff.

d. The above factors all relate to new experiences for the EEOO staff, i.e. 100% personnel strength, implementation of new procedures, and improved clerical/admin support. Such factors require approximately six months of work load data collection before an objective manpower review can be conducted.

e. DA Pam 570-551, Staffing Guide, and DA Pam 690-4, Civilian Personnel and Equal Employment Opportunity (Appendix 1) both refer to staffing standards for EEO programs. The TSARCOM EEOO is currently authorized appropriate manpower according to those guidelines.

f. A comparison of EEOO staffing in relation to population served at other Materiel Readiness Commands indicates that manpower allocated to the TSARCOM EEOO is comparable.

g. The EEOO is presently functioning as a "guardian" over all civilian personnel actions to monitor compliance with and commitment to EEO goals. That approach appears to be unrealistic and unnecessary. External influences such as federal statutes, regulatory requirements and command directed activities should be objectively reviewed so that internal procedures and methods can be established to control work load in an organized, deliberate manner. This review must include a consideration of the role to be played by the EEOO. The EEOO should establish policy, principles, practices and procedures and, according to TSARCOMR 10-1, conduct periodic evaluations, not inspect every personnel related action for EEOO compliance.
APPENDIX F

3. The role of Force Development Division is to guide staff elements in developing manpower requirements, then review for validity. Force Development cannot develop requirements for other staff elements. Each supervisor must determine his or her manpower requirements, based on logic, experience, and meaningful accurate work load data. In EEOO, the work load data recording system recommended in paragraph 1 must be implemented and at least six months of data collected, then Force Development Division will schedule another manpower review at the request of the Chief, EEOO.
MEMORANDUM FOR DIRECTOR OF THE ARMY STAFF

ATTN: DIRECTOR OF MANAGEMENT

SUBJECT: Equal Employment Opportunity Support for the Army Staff

Your memorandum of 8 November to the Deputy Chief of Staff for Personnel concerning EEO support for the Army staff has been referred to this office for reply. Your observation that the MDW EEO staff spends considerable time processing discrimination complaints, thus leaving little time for furthering affirmative action, is correct.

While EEO complaint procedures are time consuming, they have been dictated by regulations promulgated by the former Civil Service Commission (CSC). This responsibility has been transferred to the Equal Employment Opportunity Commission (EEOC), which has adopted the EEO regulations of the now defunct CSC.

The EEOC does not plan to make significant changes in the regulations covering complaints processing for possibly a year or more. The Commission's position is that the time period will allow them to gain practical experience with complaints processing in the Federal sector before making regulatory changes. The Commission is very much aware of the numerous concerns expressed by Federal managers, EEO officials, civil rights groups and employees about the burdensome, complex, and time consuming system currently in place in the Federal sector and has indicated it will try to alleviate these problems when it issues new regulations. Whatever changes EEOC makes in the system, there is no certainty that there will be a lessening of responsibilities at the operating level. Some of the ideas...
APPENDIX G

3 APR 1979

SAMR

SUBJECT: Equal Employment Opportunity Support for the Army Staff

EEOC is considering would simplify and shorten the system at the appeal level, i.e., would afford little relief at the operating level and EEOC is also considering some changes that, while making the overall system more efficient, could cause an increased workload at the operating level.

While the present complaints processing system is time-consuming, initiating changes in the regulations is not within our purview. However, under Executive Order 12067, providing for coordination of Federal equal employment opportunity programs, the Department will have ample opportunity to consult with the Commission and comment on any EEOC contemplated changes in EEO regulations. We, of course, will push for overall improvements in the system at all levels just as we did with the CSC.

The MDW EEO Office is unique in Army in terms of the scope of responsibilities and the numerous senior agency staff heads who rely on that office for advice, staff assistance, and operational support. The MDW EEO Office services some 11,500 civilian employees within the MDW complex, DA staff, staff support agencies, and associated field operating agencies in the Washington area and some outside the commuting area. In addition, the MDW EEO Office is called on to handle complaints involving DA screening panels in the career programs and in handling complaints involving major Army commanders. Thus, some of their responsibilities (it appears to be 10-15 percent of their complaint workload) are over and above that indicated by the size of their normal serviced population. It appears to me that the MDW EEO Officer job is the toughest one at that grade level in the Federal Government considering:

- The large serviced population.
- The office serves in both a staff and operational capacity.
- The large number of relatively autonomous staff agencies and other organizational entities.
APPENDIX G

SAMR.
SUBJECT: Equal Employment Opportunity Support for the Army Staff

- The overall complexity and diversity of the mission/work force.
- The unusually complicated and sensitive matters that the office handles.

I understand that MG Dohleman has allocated several additional spaces from within his own resources to the MDW EEO Office and in addition the office will receive several DA intern spaces which should provide some immediate relief but more so in the future. These additional resources should permit the MDW EEO Office to spend more time on its affirmative action responsibilities.

In summary, the procedures governing the Federal EEO complaints system are not within our control. The changes mentioned so far by EEOC will probably offer little relief at the operational level. I see no way for us to carry out the EEO program that the Secretary and Chief of Staff want and which provides the legal entitlements that employees are guaranteed without devoting sufficient resources to accomplish those tasks.

Your interest in and support of the EEO program are appreciated.

Joseph S. Bennett
Director of Equal Employment Opportunity