



U.S. DEPARTMENT OF THE INTERIOR

Office of Inspector General

Evaluation

of the Proposed
Restructure
of DOI's Office for
Equal Opportunity



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20240

January 6, 2004

Memorandum

To: Assistant Secretary for Policy Management and Budget

From: Earl E. Devaney
Inspector General

Subject: Evaluation of the Proposed Restructure of the Office for Equal Opportunity, U.S. Department of the Interior

As you requested, we evaluated an internal proposal to restructure and centralize the Office for Equal Opportunity (OEO) of the Department of the Interior (Department).

Our evaluation was based on a review of the proposal and OEO policies and procedures; interviews with Department and Bureau OEO employees, Bureau Directors, Human Resources employees, Department employees, and employees in the Solicitor's Office; and information on the operations of OEOs in eight other Federal agencies.

We concluded that OEO operations should not be centralized at this time and that doing so may actually hinder the program. Instead, the Department should consider changes within the existing organizational structure. Our report includes suggestions that should improve OEO, save money, build up morale, and ultimately better serve employees of the Department.

Although a response to this report is not necessary, we would appreciate being informed of any actions taken on our suggestions. If you have any questions about our work, please call me at (202) 208-5745.

Introduction

The Department of the Interior (Department or DOI) developed a proposal to restructure and centralize the Office for Equal Opportunity (OEO). The restructure proposes to consolidate functions, eliminate duplication, reduce costs, and improve quality and timeliness of services to customers. A Management Initiatives Team¹ (MIT) was formed to review and analyze the proposal.

Based on the concerns expressed by the MIT and stakeholders that the proposal lacked detail in the areas of funding, staffing and responsibility, and that it may represent a “solution looking for a problem”, the Assistant Secretary for Policy, Management and Budget requested that the Office of Inspector General (OIG) assess the proposal and explore other options.

Our assessment² included benchmarking against eight other government agencies³ (see Appendix 1) to determine best practices within their OEO programs; interviewing Department and Bureau OEO employees, Human Resources (HR) employees, Bureau Directors, employees in the Solicitor’s Office, and DOI employees on the MIT; and reviewing policies, procedures and other documents related to the OEO program at DOI.

In summary, we found no evidence to conclude that such a wholesale restructuring would accomplish any of its stated objectives. We also discovered that the unexpected results of such a restructuring would be severed communications with stakeholders – an impediment to prevention and early resolution of potential complaints.

¹ The Team was composed of representatives from seven bureaus and the Office of the Secretary.

² We performed this assessment in accordance with the Quality Standards for Inspections issued by the President’s Council on Integrity and Efficiency in March 1993.

³ We benchmarked at Department of Labor, Department of Energy, Department of State, Department of Veterans Affairs, Small Business Administration, Environmental Protection Agency, Department of the Army Material Command, and the Department of Education.

We did find, however, that management centralization may be a viable option for addressing Title VI and IX civil rights issues.⁴

Finally, we concluded that the Department has less costly and less disruptive alternatives to the proposed restructure. We identified several key areas – leadership, organization, and accountability – that need improvement in the OEO program, but conclude that this can be accomplished largely within the existing OEO structure.

⁴ Title VI prohibits discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance; Title IX prohibits discrimination based on sex in any educational program or activity receiving federal financial assistance.

Department's Proposed Restructure

The restructure of OEO proposes to consolidate functions, eliminate duplication, reduce costs, and improve quality and timeliness of services to customers.

The restructure would:

- ✓ Centralize 160 current full-time employees from 58 locations throughout the United States into a headquarters office, three regional offices, and eleven satellite offices.
- ✓ Suggest that centralization would reduce the backlog of cases and improve timeliness and efficiency. It states that case resolution continues to take too long (average 700 days).
- ✓ Realign the Affirmative Employment Program (AEP) under individual bureau HR offices in order to gain hiring authority for recruitment purposes and to accomplish affirmative employment goals and diversity initiatives.
- ✓ Consolidate complaints of internal discrimination (Title VII) and public civil rights violations (Titles VI and IX) in the renamed Office of Civil Rights that would be co-located in the above-mentioned regional and satellite offices.

OIG Review and Findings

On its face, the proposal appears to present an opportunity to streamline the OEO's functions. Upon closer examination, however, we found that:

- ✓ The benefits of restructuring, if any, are gained at the cost of communication and proactive prevention.
- ✓ Centralization would cause bureaus to lose staff positions and to incur additional costs for OEO services through the Department's Working Capital Fund.
- ✓ Centralization of the OEO offices would eliminate essential day-to-day interaction among OEO counselors, human resources staff, employees and managers, and thus, may impede early resolution.
- ✓ The proposal does not persuasively demonstrate how centralization will reduce costs.
- ✓ The proposal overstates the average number of days for DOI case resolution (705 days), which is less than the average processing time of 867 days among federal agencies. In addition, on average, 467 of those days represent time that the complaint was pending at the Equal Opportunity Employment Commission.
- ✓ The proposal does not identify the costs or source of funding for the restructure. Further, it did not provide a sufficient level of detail – such as total number of affected employees or projected number of permanent change of station (PCS) moves – to even allow us to estimate the cost of the restructure. The costs, however, could be high. In that regard, the average cost for a permanent change of station is \$80,000; the average severance pay for a GS-13 employee is \$71,000; the average start-up costs (phone and data lines, furniture, etc.) for 50 people is approximately \$1.5 million; the average annual lease for the same 50 people is about \$300,000.

- ✓ The proposal does not define the assignment of staff and resources, nor does it consider the impact on the bureaus.
- ✓ The proposal may require the Department to reprogram current funding for buy-outs and early-outs (contrary to the proposal's assumptions) because it has not identified employee positions and job locations. As it stands, it may also require a reduction-in-force.
- ✓ The proposal realigns AEP staff under HR, but the majority of bureau comments prefer to keep it in OEO.
- ✓ The proposal fails to address several weaknesses in OEO – real or perceived – that were identified by stakeholders (see Appendix 2).

Suggested Actions

With a focus on the successes in the bureaus' and other departments' OEO programs, we identified five areas that, if strengthened with vigorous Departmental involvement, could be addressed within the existing OEO structure, eliminating the need for the proposed restructure and its attendant disruptions, costs and uncertainties.

1. Bolster Central Leadership

The Departmental OEO suffers from the perception it lacks strength, objectivity and assertive management of the program. This, in turn, dilutes the effectiveness of the program in the bureaus.

"[There is] No leadership at the departmental level."

Our interviews confirmed that employees firmly believe that strong departmental leadership is the key to achieving effective program operation. Employees do not believe that the current Departmental OEO has the necessary leadership. In fact, the perception at seven of the nine bureaus is that there is "no leadership at the departmental level." Employees believe that this must change.

We did not conduct an in-depth review of OEO management, and thus, cannot comment substantively on the validity of the leadership concern. We do, however, recognize the considerable impact that perception has in the leadership arena and offer the following actions that might be taken by the Department to resolve the leadership perception problem:

- A. Ensure that the OEO Director is technically qualified to lead the OEO office and is equipped to effectively and impartially advance the mission of the OEO Program for the Department.

The OEO program is dedicated to the principle that employees are entitled to equal opportunity in the workplace without regard to their race, color, sex, national origin, religion, disability, age, or sexual orientation. An OEO program committed to an affirmative effort of education, outreach and prevention should, if successful, spend increasingly less time involved in the complaint process.

Leading a successful OEO program requires more than a basic knowledge of EEO laws and regulations and more than fundamental management skills, although these are necessary prerequisites. A successful OEO program, however, also requires a leader with vision and gravitas, who can command the respect of managers and employees alike, and who can lead the OEO staff with a firm command of the principles that underlie equal employment opportunity combined with powerful and effective management skills.

A successful leader must also be supported by an objective organizational framework that builds and sustains the confidence of stakeholders. Internal controls to ensure accuracy, quality and consistency in the administration of the OEO program must be established, not only to protect the integrity of the OEO program, itself, but to enhance both the perception and the reality of impartial accountability.

The OEO program at the Department of State has recently been revamped, addressing many of the same challenges that the DOI OEO program faces. The Department of State OEO program could serve as a model for DOI as it seeks to improve its program.

- B. Elevate the level of importance and the perception of objectivity of the OEO Director by having that individual report directly to the Assistant Secretary for Policy, Management and Budget.

There is a perception of bias and lack of neutrality.

The OEO leadership must overcome a perception of bias and lack of neutrality, a perception voiced from both management and employees of the Department, especially in offices that report through their HR office. The perception of bias, whether pro-employee or pro-management, is a factor that employees take into consideration when deciding whether or not to file a complaint. All of the eight agencies we benchmarked have OEO programs that report outside of HR, precisely because it sends a strong message of neutrality to both employees and managers.

If the Department's OEO Director reports directly to the Assistant Secretary for Policy, Management and Budget, rather than through the Deputy Assistant Secretary for Human Resources and Workforce

Diversity, this realignment will set the stage for the OEO to assume a role of central, objective leadership without centralizing the entire program. This reporting structure is encouraged under guidance issued by the Equal Employment Opportunity Commission and has been adopted by each of the agencies we visited. This reporting realignment should also be followed by the bureaus, with bureau OEO Directors reporting through the Bureau Director to the Departmental OEO Office.

- C. Ensure that the OEO office issues clear, consistent, and concise EEO policies and procedures.

The Departmental OEO needs to issue readily understandable EEO policies and procedures that are implemented and adhered to Department-wide. Specifically, OEO leadership needs to provide standardized policies and procedures that do not require individual interpretation, including checklists, definitions, and the roles and responsibilities of the Department and bureaus. For example, there are inconsistencies in policies and procedures among the eight different agencies in the Department because each one has its own interpretation of how EEO should be organized and operated. Furthermore, even those policies and procedures governing the OEO headquarters office need to be revisited and revised to provide clarification of responsibilities and establish internal controls to ensure accuracy, quality and consistency in the administration of the OEO program.

The eight governmental agencies that we benchmarked unanimously agreed that clear and concise policies, procedures, and guidance are critical to an effective equal opportunity program.

Even the Departmental Manual (DM) contributes to the confusion. For example, the DM grants to the OEO Director the authority for “[m]aking final decisions on complaints filed by employees and applicants alleging discrimination.” This language suggests that the OEO Director has exclusive authority in this arena, and fails to capture the role of the Program office and the Office of the Solicitor in the process. Absent a formal review (including legal review) and approval process, this practice not only fails to provide quality assurance and control, but subjects the Department to potentially damaging decisions that it may be forced to abide by.

A 2003 study⁵ confirmed that the Department's OEO is responsible for policy development and programmatic guidance, dissemination of guidance to bureaus, and monitoring and overseeing bureaus' civil rights enforcement. Currently, the Department's OEO still lacks a unit dedicated to policy development and programmatic guidance. The bureaus have been charged with formulating procedures, but the Department has not followed up to ensure that this has been done.

Areas in which clear, concise policy and procedures are seriously lacking include, but are not limited to:

- ✓ Acceptance of complaints for investigation
- ✓ Conducting EEO investigations
- ✓ Settlement negotiations, including Alternative Dispute Resolution
- ✓ Settlement authority, including review and sign-off requirements
- ✓ Training requirements for OEO officers, counselors and investigators
- ✓ Training requirements for managers and employees

The OEO need not begin anew. Our review identified two agencies from which the OEO might borrow and adapt sound EEO policies and procedures. The Environmental Protection Agency and the U.S. Army Materiel Command both have decentralized field office EEO operations and have policies and procedures in place that are comprehensive and comprehensible.

D. Ensure that the OEO monitors and enforces adherence to policies and procedures addressed under C, above.

The Departmental OEO should maintain an active oversight role and improve efficiency. For example, contracts for EEO investigative services have been problematic for the individual bureaus because they utilize different contract standards and often settle for the lowest bidder. In one instance, it took a bureau a year to get the case back from a negligent contractor. In another case, a bureau was left to fight

⁵ "Ten-Year Check-Up: Have Federal Agencies Responded to Civil Rights Recommendations?" U.S. Commission on Civil Rights

with procurement over price issues. In yet another example, a bureau went through four contractors before it finally got a reliable investigative product from a fifth contractor. An OEO centralized contract for investigative services awarded to a responsible bidder would certainly address some of these problems.

All departmental employees should be aware of their civil rights; however, the DOI does not provide general, accessible civil rights training. Once again, the Departmental OEO office is missing an opportunity to take a leadership role by distributing clear and consistent policies and procedures to the bureaus, and by making civil rights training accessible to all DOI employees.

To enhance monitoring, enforcement, and oversight, the OEO office could:

- ✓ Assign Departmental OEO employees as liaisons to specific bureaus
- ✓ Administer an annual department-wide survey to assess neutrality within the OEO program
- ✓ Conduct self-assessments of bureau OEO offices

The Department could incorporate a central approach that affords bureaus a level of autonomy but also facilitates cooperation and communication. Also, OEO should focus on the totality of management accountability and implement oversight and quality assurance procedures to ensure that responsibilities delegated to the bureaus are carried out properly, quickly, and consistently.

E. Staff the OEO with diversity reflective of the Department's workforce.

"There is no diversity in the diversity office."

The Department has a goal to ensure that its workforce is representative of the American population. All bureaus and offices should maintain a diverse profile in their OEO offices and strive to achieve a level of diversity that at the very least resembles, if not reflects, the make-up of the Department. We heard concerns from more than one bureau that "there is no diversity in the diversity office." Greater diversity in the OEO office will better equip counselors to relate to and effectively counsel employees.

We suggest that the Departmental OEO office develop a staffing plan, recruit individuals that represent the diversity in the Department, and consider rotating field employees through the Departmental OEO office.

2. Keep an OEO Presence in the Field

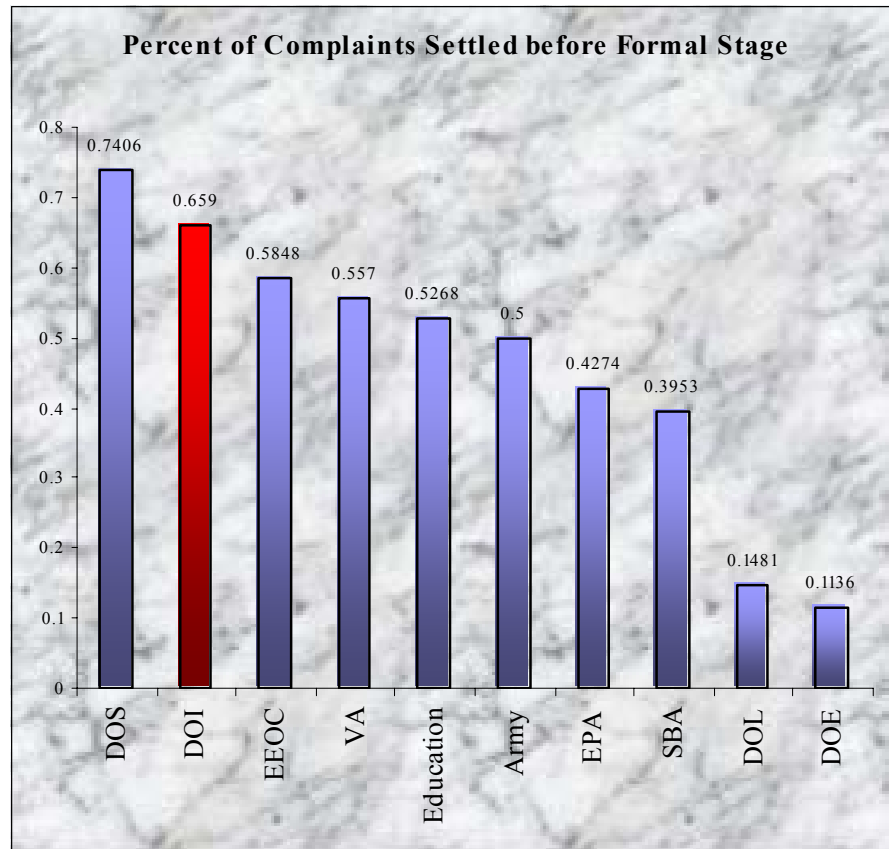
"Face-to-face counseling is important."

The proposed centralization emphasizes prevention over resolution. However, centralization could potentially deprive current offices, in remote places such as Juneau, Alaska or Gallup, New Mexico, of access to an on-site counselor to prevent a complaint. According to the government agencies we interviewed, a higher number of complaints are resolved informally when the OEO counselor is immediately available to both management and employees. To remove the OEO presence from the field environment would distance employees from the process and decrease their level of comfort. On-site counselors have built the relationship of trust and confidence necessary for a complainant to disclose his or her concerns and for managers to seek guidance about their responsibilities. As one bureau employee explained, "Face-to-face counseling is important in most cases. Intake over the phone is only a way to get started."

The proposed regional office concept unnecessarily formalizes the informal consultation that exists presently on both sides and may compromise open communication. We heard many concerns that the program would become impersonal and detached if moved to the Department level. The bureaus feel strongly about maintaining an OEO presence in the field. We agree.

"Case resolution rate exceeds the government average."

During FY 2002, there were 1,006 informal complaints filed with the Department's OEO counselors, of which only 343 went to formal complaint, resulting in a resolution rate of 66 percent. Compared to the governmental agencies we benchmarked, the DOI's resolution rate was prominent. In fact, according to the most recent report that the DOI submitted to the EEOC, DOI states that the, "resolution rate exceeds the government average by 15 percent."



These statistics⁶ suggest that the current decentralized structure promotes awareness and prevents complaints because employees have direct access to OEO staff. Centralization, on the other hand, would eliminate the essential interaction among Departmental employees, managers, HR, and OEO officials, which was chronicled to us by those we interviewed.

3. Assign Permanent Legal Counsel to OEO

The OEO does not fully utilize the Solicitor's Office.

All eight of the government agencies we benchmarked reported that their OEO managers worked directly with legal counsel dedicated to equal opportunity issues, interpreting case law, and reviewing legally-binding documents, such as, final agency decisions, settlement agreements and appeals.

The OEO at DOI should have similar access to permanent, full-time legal counsel from the Office of Solicitor (SOL). Once access to legal

⁶ While these statistics do suggest that the Department is successful in its early resolution of potential complaints, this high rate of resolution could also indicate that the Department is settling cases that should not be settled.

support for the Departmental OEO has been addressed, a needs assessment should be performed to determine how much legal support the bureaus need in the field.

The SOL legal support in the equal employment opportunity arena should be supplemented with expertise and support in the human resources arena. A related concern we heard from stakeholders was the lack of involvement of the HR office, particularly in the context of settlement agreements.

Currently, the OEO does not benefit from the full extent of the SOL's legal advice, although the SOL has made repeated efforts to provide its legal assistance, due to a perceived conflict of interest⁷. We suggest that, in order to avoid any perception of a conflict of interest, the Solicitor's Office assign legal resources that work primarily on equal opportunity matters and that they be segregated from attorneys involved in the hearing and resolution process.

If SOL legal support were supplemented with close communication between the OEO and HR offices, the Department could significantly reduce the risk of settlement agreements conflicting with personnel regulations. One of the bureaus adheres so strongly to this cooperative approach that it requires an HR official to sign-off on all settlement agreements involving personnel actions.

4. Phase Out "Collateral Duty Counselors"

Collateral duty counselors should be phased out.

The OEO counselor is central to the entire complaint process. An effective counselor must be knowledgeable of the legal rights and responsibilities attendant to Equal Employment Opportunity, must maintain a high level of professional objectivity, and, at the same time, empathetically advise individuals who believe they have been aggrieved.

Presently, full-time Department employees – in professions as diverse as accountants, geologists, and park rangers – volunteer as "collateral duty" counselors. The OEO ensures that they receive annual training, but the nature of the complaint process requires a high level of dedication and involvement.

⁷ The perceived conflict of interest exists because SOL attorneys represent the Department, and by extension are viewed by the OEO representing management.

A number of those we interviewed believe that part-time counselors are ill-equipped to resolve disputes at the earliest stages and lowest possible level. They suggested phasing out collateral duty counselors and replacing them with full-time, albeit fewer, counselors. Some bureaus have already done so.

Given their considerable importance to the process and the level of responsibility assigned to these counselors, we agree that collateral duty counselors should be phased out and replaced with full-time counselors, to the extent practicable. We recognize, however, that in some locations the use of collateral duty counselors will continue to be necessary, and therefore, do not advance this change wholesale, but rather in a reasoned, well thought-out approach.

Competing demands and inherent potential for conflict of interest reinforce the wisdom of discontinuing the collateral duty counselor approach. Anecdotally, we learned of a collateral duty counselor who received training for seven consecutive years with no cases to handle, only to quit this collateral duty when finding her first case “too difficult” to handle. In another instance, a collateral duty counselor delayed the interview of the manager against whom the complaint was made for several weeks because the manager was the selecting official on a promotion for which the counselor had applied. Bureau OEO offices invest in and expect performance from collateral duty counselors, but the OEO offices have no authority to measure the timeliness or effectiveness of a collateral duty counselor’s job performance. Full-time counselors assigned to bureau OEOs would provide OEOs with oversight, annual performance input, and removal authority over the counselors on whom they so greatly rely.

5. Institute a Departmental Tracking System

A tracking system can serve as a management tool.

DOI has no centralized, automated complaint tracking system. Seven of the eight governmental agencies we benchmarked use an automated complaint tracking system,⁸ allowing them to accurately track complaints, generate required reports, increase the ability to monitor component complaint activity, improve intra- and inter-departmental communication, and provide greater transparency. Currently, the majority of bureaus receives only limited EEO case

⁸ The eighth agency was small enough to adequately track its complaints with manual spreadsheets.

information and feels alienated from the process at the Departmental level.

Frustrated with the lack of a Departmental tracking system, one bureau developed its own system to track complaints. Another bureau regrets not purchasing a tracking system, while other bureaus continue to request that the Department acquire an automated tracking system.

Absent this technology, the Department cannot accurately determine the status of complaints. For instance, one bureau was not informed that a complaint it believed had been resolved, had, in fact, been appealed. A tracking system can also serve as a management tool, on a much broader level, to monitor trends, identify available resources, and match resources to bureau needs. A tracking system would also allow the Department to target weaknesses, identify best practices, and communicate case information.

Finally, a tracking system would also provide the Department with comprehensive information about settlement of cases. While we developed no specific information in this assessment to suggest that complaints are being settled inappropriately, the Department has no present ability to capture and analyze this aspect of the OEO program. A tracking system would alleviate this management deficiency.

Additional Issues

1. Affirmative Employment Program

The proposed restructure realigns the Affirmative Employment Program (AEP) under HR. Currently, the HR staff has hiring authority, and the proposal suggests that the AEP group, in order to gain hiring authority for recruitment purposes, be transferred to HR. Citing the protection of Privacy Act information, the bureaus expressed their preference that the AEP staff remains in the OEO. The bureaus propose having a cooperative relationship between OEO/AEP and HR, with both offices represented at job fairs for recruitment purposes.

While we found no Privacy Act prohibition, we suggest that the Department revisit whether AEP should remain in the OEO. This would leave in place the existing structure, optimize recruitment, and retain the information for which AEP is responsible in the office where such information is most useful and needed.

2. Titles VI and IX

We suggest that the OEO centralize current civil rights staff.

The proposed restructure would realign the Titles VI and IX Civil Rights Programs into the newly formed regional offices.

The area of Titles VI and IX civil rights provides a unique opportunity for the OEO to exercise leadership. To best address the complexity of these issues, civil rights staff should secure and maintain specialized substantive knowledge in the specific areas of the law for which they are responsible, as opposed to cross-training. We suggest that the OEO consider centralizing in Washington, D.C. current civil rights staff to pool the Department's expertise and build a comprehensive knowledge base of public civil rights laws.

The OEO should then consider compiling a database of federal funding recipients, conduct a workload analysis, and design a plan of implementation to perform pre-awards, post-awards, and on-sight reviews of federal recipients.

In Closing

The Office for Equal Opportunity does not call for restructuring; rather, it calls for some profound changes within the existing organizational structure. These changes can be accomplished, however, with considerably less disruption to OEO's operations and with far less impact on the potentially affected human resources.

We believe that the changes suggested in this report will improve the OEO, save money, improve morale, and ultimately, better serve the employees of the Department of the Interior. We hope that these suggestions will be used constructively while the circumstances are optimal for change.

Benchmarking

<u>COMMENTS ON CRITICAL ELEMENTS</u>	<u>FEDERAL AGENCY*</u>							
	<u>DOL</u>	<u>DOE</u>	<u>DOS</u>	<u>VA</u>	<u>SBA</u>	<u>EPA</u>	<u>DOA</u>	<u>ED</u>
Agency heads issued a statement of commitment on civil rights.	X	X	X	X	X	X	X	X
Having OEO directors report to the agency head sent the message to employees that civil rights and equal opportunity are high priority.	X	X	X	X	X	X	X	X
OEO directors reported directly to the agency head.			X				X	
OEO directors did not report directly to the agency head but had direct access when needed.	X	X		X	X	X		X
Having the OEO director not report directly to the agency head adversely affected the perceived commitment of the agency to the program.				X				
OEO directors did not report to Human Resources and doing so would conflict with OEO statutory requirements.	X	X	X	X	X	X	X	X

<u>COMMENTS ON CRITICAL ELEMENTS</u>	<u>DOL</u>	<u>DOE</u>	<u>DOS</u>	<u>VA</u>	<u>SBA</u>	<u>EPA</u>	<u>DOA</u>	<u>ED</u>
The training of employees was used as an opportunity to proactively disseminate and discuss program information.	X	X	X	X	X	X	X	X
A form of self-assessment was used to monitor program progress and identify barriers that impeded free and open competition in the work place.	X	X	X	X	X	X	X	X
An automated complaint monitoring and tracking systems was implemented, utilized, and considered necessary to the successful management of the program.	X	X	X	X		X	X	X
Dedicated legal counsel has direct involvement in the complaint process and was critical to an impartial and objective OEO program.	X	X	X	X	X	X	X	X

* The Federal agencies include the Department of Labor (DOL), Department of Energy (DOE), Department of State (DOS), Department of Veterans Affairs (VA), Small Business Administration (SBA), Environmental Protection Agency (EPA), Department of the Army Material Command (DOA), and the Department of Education (ED).

Comments and Concerns

During our interviews, bureau employees raised many concerns about the OEO restructuring similar to those expressed to the Assistant Secretary. We created the table below to show those concerns. If an “x” is not indicated for a bureau, the concern was not raised during our interviews. This is not a survey; it merely demonstrates that a particular concern was mentioned by employees of one or more bureau.

The information presented was obtained through interviews with departmental and bureau employees, including bureau management, and OEO program managers and staff, and two “white papers” provided to us.

Comments and Concerns	BIA	BLM	BOR	FWS	MMS	NPS	OS	OSM	USGS
Department acts as if OEO proposal is a done deal	X	X	X	X	X	X	X	X	X
Proposal does not identify problem; leaves unanswered questions, including costs associated with RIFs and PCS	X	X	X	X	X	X	X	X	X
Why do all Bureaus need to change if problem is with only a few		X	X	X		X	X		X
Use a pilot project for bureau(s) with problems			X	X		X	X		X
OEO personnel should be knowledgeable and full time	X			X		X			X

Comments and Concerns	BIA	BLM	BOR	FWS	MMS	NPS	OS	OSM	USGS
Face-to-face counseling and knowledge of bureau may be lost with centralization	X	X	X	X		X	X	X	X
No leadership at the Department level	X	X	X	X	X	X			X
Bureaus are not informed of appeals/status by automated tracking system	X	X				X			X
No Title VI and IX Department Policy	X	X	X	X	X	X	X		X
Freeze on OEO positions has affected performance	X	X				X			X
Need to consolidate all public civil rights personnel at Department		X			X	X		X	X
Lawsuits may result from restructure			X				X		X
Affirmative employment program should not be in HR				X		X			X
Affirmative employment program should be in HR	X			X	X				X