



UNITED STATES DEPARTMENT OF EDUCATION

THE DEPUTY SECRETARY

AUG 19 1994

MEMORANDUM TO ALL EDUCATION EMPLOYEES

FROM : Madeleine Kunin *MK*

SUBJECT: Impact of Reinvention Initiatives on  
Grade Levels and Jobs

Over the past several months, the Secretary and I have initiated a number of reinvention efforts to make the Department of Education an effective organization that is responsive to its customers. As we move forward, we are aware that many of you may be concerned about the impact these changes may have on your grade levels and careers. The Department's position on grade levels and employment is as follows:

In accordance with the National Performance Review requirements to reduce layers of supervision, the current 1:6 ratio of supervisors to nonsupervisors will be lowered to a ratio of 1:12 by 1999. To accomplish this, the existing 692 supervisory positions in the Department will be reduced largely through attrition and restructuring.

The Secretary and I believe that reductions-in-force (RIF) and downgrades are extremely disruptive and seriously damage morale. In addition, recovery for affected employees and the organization can take years. Therefore, we have decided that as the number of supervisors is reduced, management will assign work that supports the existing grade levels of employees. Our goal is to avoid RIFs or downgrades as a result of reinvention initiatives. We have asked the Office of Management to advise managers on ways to preserve the grade levels of employees whose jobs are being changed by assigning them to positions that require program, technical, or other professional expertise.

Thank you for your patience and support during this important transition period. We have already made significant progress and can take pride in our accomplishments thus far.

To: All OCR Staff

From: Norma V. Cantú  
Assistant Secretary

Marvin C. Farmer  
President  
AFGE Council 252

Subject: Memorandum of Agreement to Implement Senior Management Structure

We are pleased to announce the completion of a Memorandum of Agreement that will enable us to begin implementation of OCR's new Senior Management Structure. The new structure creates four Enforcement Divisions, with three regional sites in each division, including the new D.C. Enforcement Office and the Cleveland Office as independent sites. The Enforcement Divisions will work with the new Enforcement Directors. The structure is designed to reinforce the team-based approach that we have encouraged in each individual office. It is also intended to facilitate the development of effective labor/management partnership approaches in each Division.

Each Division will have an Enforcement Coordinator. This individual will work as a "team leader," with the individual site managers, to help coordinate OCR's compliance and enforcement efforts. As discussed during the negotiations over the Senior Management Structure, in Division B, the Assistant Secretary may fill the Enforcement Coordinator position separately, rather than combining this function with those of a site manager. In each of the other Divisions, the position will be filled as described in the October 17, 1995 "Moving Forward" memorandum.

Management positions in the new structure will be filled by the lateral reassignment of OCR senior staff. The negotiated agreement specifically describes the consultation process with the union that will be followed before any assignments are made. We are aware that there was a perception that positions were being filled absent consultation and that the processes identified during the negotiation were not being followed. This was never management's intention and no Enforcement Coordinator selections have been made. As described in the attached Implementation Schedule, certain portions of this process will be redone to ensure full compliance with the negotiated agreement. We are firmly committed to honoring every commitment contained in the negotiated agreement and in the

"partnership" attachment.

Although the Memorandum of Agreement is a negotiated document, the negotiations were conducted in a spirit of labor/management partnership, as reflected in the language of the agreement and its "partnership" attachment. The Management and Union negotiation teams are to be commended for their excellent efforts and for the manner in which every one of their many discussions were undertaken. We would also like to thank Bonnie Carroll, the Department's Labor Relations representative, for her assistance and her good counsel.

Attachment

## MEMORANDUM OF AGREEMENT

The purpose of this Memorandum of Agreement is to document the agreement reached by and between the American Federation of Government Employees, National Council of Education Locals, Council #252 (Union), and the Department of Education (Employer), hereafter referred to as "the parties". This agreement is entered into as a result of the parties having completed partnership discussions and negotiations in accordance with Article 8 of the Collective Bargaining Agreement regarding the reorganization of the Office for Civil Rights (OCR), senior management structure and its impact to bargaining unit positions. When this Agreement refers to duties to be performed by named officials of the Employer or the Union, it is understood that the Parties reserve their respective rights to assign these duties, and have them performed, by other officials.

### A. Creation of Additional Senior Investigative Positions (GS-13)

As part of the implementation process for the senior management restructuring, the Assistant Secretary will seek assistance from OM to approve the establishment of 25 additional GS-13 positions within the bargaining unit for the Enforcement Divisions. The final number of positions within the bargaining unit will be subject to applicable classification standards and authority. Once approved, these positions will be allocated proportionally to each Division based upon the number of investigators in each Division as of November 1, 1995 (which was prior to the most recent buyout). The Enforcement Coordinator and site manager will meet with their respective local presidents to determine the distribution of positions within each Division.

Funding for 10 of these positions will be allocated by April 1, 1996. Funding for the other 15 positions will be allocated as follows: 5 will be funded by January 1, 1997; 5 will be funded by April 1, 1997 and 5 will be funded by July 1, 1997. These positions can be competed and filled as soon as funding has been allocated. These commitments are subject to the availability of sufficient funding to avoid furlough days for all staff. Should sufficient funds not be available to avoid furlough days by April 1, 1996 or January 1, 1997, OCR will resume funding the same numbers of positions anticipated for each year as soon as funding permits. The remaining schedule for 1997 will remain unchanged to the extent that available funding permits.

For each quarter in FY'96, the Assistant Secretary will provide to the LMPC updates on actual expenditures under the FY'96 budget. As soon as the Assistant Secretary receives a "plan against" budget number from the Department for FY'97 (anticipated to be during the summer of 1996); she will meet with the LMPC to discuss the overall distribution of grades within OCR, determine whether funds are

available to allocate for additional upgrades and if so what those allocations would be. After the FY'97 budget is approved, she will revisit this discussion with the LMPC if the budget received for FY'97 differs from the "plan against" figure. It is understood by the parties that the final authority to allocate funds rests solely with the Assistant Secretary.

As a result of restructuring efforts, some regional offices already have nonsupervisory grade 13 EOS positions. When any nonsupervisory EOS grade 13 position is vacated, it is anticipated, absent compelling arguments to the contrary, that the vacancy will remain at the site where it occurred.

By entering into this agreement, the Union is not waiving any rights it might otherwise have to initiate bargaining over career ladder positions in the bargaining unit. Nor does this agreement affect any continued discussions between the Union and the Assistant Secretary to develop a workable strategy for raising the career ladder structure for EOSs and attorneys.

#### **B. Union Consultation Prior to Manager Selection Process**

1. In considering individuals for assignment into the position of Enforcement Coordinator (EC), the following criteria will be taken into account: leadership ability, especially with respect to teams, support of union/management partnership activities, regional experience, and coaching and mentoring skills.

2. The selecting official will consult with the local president(s) in each Division before making a decision about the assignment of any individual to an Enforcement Coordinator position.

3. Prior to doing so, the selecting official will confirm the interests of grade 15 employees in any of the four EC positions. The local presidents in each Division will be able to talk with any individual who has expressed an interest in the coordinator position. Following these conversations, the Union will have the opportunity to consult with the selecting official.

4. With respect to the SES Enforcement Director position, the Assistant Secretary will consult with the President of Council 252, before making a recommendation to the Secretary.

#### **C. Training**

To facilitate the implementation of the new structure, training is being planned within each Division, in the new D.C. Enforcement Office and in the Cleveland Office. A specific training strategy has been developed through

union/management partnership and is attached for easy reference.

#### **D. Assessment of Division Structure and Enforcement Coordinators**

It is expected that the site managers, local union officials, and Enforcement Coordinators of each Division will assess the effectiveness of their coordination of Division operations on an on-going basis. The SES Enforcement Director will participate in these assessment activities as appropriate and assist the Division in resolving identified issues.

A more formal assessment of the Division structure and the functioning of each Division will be initiated by the LMPC by October 1, 1996. The purpose of this assessment is to determine whether the structure and the operations of each Division are resulting in the expected efficiencies and improvements in OCR's compliance program.

The process for this assessment will be as follows:

- The OCR LMPC, in conjunction with the AS, DAS, SESs, Enforcement Coordinators, site managers, local union officials and other affected OCR staff, will develop the evaluation criteria based on the design goals expressed in the reorganization proposal submitted to OM, position descriptions, this agreement, and expectations identified as a result of the senior management training.
- The LMPC will develop the evaluation criteria and share them with the Divisions.
- As part of the evaluation process, each Division (site managers, local union officials, Enforcement Coordinators, and employees) will complete a self-assessment based on these criteria and present their findings to the LMPC.
- The LMPC will review the information provided and forward the assessments to the appropriate SES, along with follow-up recommendations. These recommendations may include such things as structural adjustments, revisions to position descriptions, training, and geographical workload adjustments.
- Once the first evaluations have been completed, the LMPC, along with the AS, DAS, SESs, Enforcement Coordinators, site managers, local union officials and other affected staff, will review the evaluation process, criteria and outcomes and determine whether the process should be repeated, with the same or revised criteria, and in what period of time.

### E. Establishment of Cleveland Office

This restructuring establishes Cleveland as a separate site. The Cleveland Office will be part of Division C. A specific process for filling the site manager position was developed, through partnership, by the OCR LMPC, and is attached to this negotiated agreement.

### F. New Allocation of States

The D.C. Enforcement Office initially will include the District of Columbia and the states of North Carolina and Virginia. To accommodate this transfer of work and to ensure an equitable distribution of work among the enforcement divisions, the Philadelphia office in Division A will now include Kentucky, Delaware, Maryland, Pennsylvania and West Virginia. The Atlanta office in Division B will now include Alabama, Florida, Georgia, South Carolina and Tennessee. The Cleveland office in Division C will include Michigan and Ohio. (Initially this office may handle only ESE cases.) The Kansas City office in Division C will now include Iowa, Kansas, Missouri, Nebraska, and North and South Dakota. The Denver office in Division D will now include Arizona, Colorado, Montana, New Mexico, Utah, and Wyoming. The distribution of states to all other offices is unchanged.

Within 30 days after this agreement is signed, the Enforcement Coordinators and the local presidents from the offices directly affected by the new distribution, will develop a specific implementation plan and schedule designed to minimize negative impact on case processing and staff. The draft plan and schedule will be circulated to all affected staff for comment before it is implemented. The schedule for the transfer of states to the D.C. Enforcement Office will be consistent with any agreements reached by union and management in the implementation plan for that office.

This Agreement resolves all issues arising from the Employer's implementation of the reorganization of its senior management structure.

For the Employer:

For the Union:

/s/

/s/

\_\_\_\_\_  
Cathy H. Lewis

\_\_\_\_\_  
Arthur C. Tedeschi II

/s/

/s/

\_\_\_\_\_  
Gary D. Jackson

\_\_\_\_\_  
Mary Lou Starling

/s/

Bonnie J. Carroll

/s/

Woodrow Mayes, Jr.

## UNION/MANAGEMENT PARTNERSHIP AGREEMENTS

The provisions contained in the following three sections were developed through partnership rather than through negotiations and are not part of the Memorandum of Agreement between the parties.

### A. Training Strategy

#### 1. Divisional Team Training

There will be training in team leadership skills for team leaders and managers who will be working together within the newly-constituted enforcement divisions. Local union presidents (or their designees) will be included in this training. There will also be a 1 day session in each division that will include the site managers, Enforcement Coordinator, local presidents and the SES. This session is intended to facilitate teamwork and cooperation within the division.

#### 2. Training for Staff in the D.C. Enforcement Office

Training to increase investigative skills and program knowledge will be essential for the successful development and operation of the D.C. Enforcement Office. It is anticipated that basic training provided to the group might include: team building, CRISS, and issue specific training in Section 504 and Title II of the ADA, Lau and Minorities in Special Education. All of this training will be offered to staff within six weeks after the unit is established. This "class room" training experience will be followed by "on the job training" that will include direct participation in case related activities conducted by experienced staff from the Philadelphia and Atlanta offices. Additional issue specific training and skills building (e.g., mediation) also will be provided to staff on an "as needed" basis during the first six months of operation of the unit.

#### 3. Training for Recent Hires in Regions

Certain regions have only been able to provide program training for new or reassigned staff on a "catch as catch can" basis. Any investigative/attorney

staff member brought on-board within, perhaps, the last 18 months to two years, should be provided access to the same training that Metro will get. This will be accomplished by providing the training plans/packages developed for Metro to each region, whose human resources component can coordinate any training needed locally. (Any other regional staff member in need of training also will have access to this opportunity.)

#### 4. Training for Cleveland

If the Cleveland site is to eventually assume responsibility for postsecondary cases, as well as elementary and secondary cases, additional training may be required. Cleveland's training needs will be assessed and addressed by the SES, Enforcement Coordinator, Site Managers, and Local Union Presidents.

#### B. Building the Labor-Management Partnership Relationship

1. The creation of the Enforcement Coordinator positions offers OCR a unique opportunity within each Enforcement Division to promote a unified labor-management approach for addressing administrative and programmatic issues. Within each Division there will be three managers (or four if the EC is not a site manager), and three local presidents, who will work closely together to ensure effective labor-management partnerships within the Division. It is the intention of the parties to meet in partnership for the purpose of discussing and resolving administrative or programmatic issues that affect bargaining unit employees.

2. This addition to our management structure provides a forum for discussion of complex or sensitive labor relations matters within the Division. The Coordinator will also be accessible to any local president within the Division, for discussion of any other labor relations issues arising within the Division. It is envisioned that this structure will serve as a model for other managers within the Division in establishing and maintaining an effective partnership relationship with the union.

#### C. Selection of the Cleveland Site Manager

The position of site manager for the Cleveland office will be posted and competed. The recruitment area will be determined by the appropriate Enforcement Director, in consultation with the Enforcement Coordinator for Division C and the local



## Implementation Timetable

This timetable was agreed upon in partnership and is not part of the Memorandum of Agreement.

1. Final draft of the agreement will be shared by the management team with the OAS and by the union team with Council 252 no later than Friday, February 16.
2. The union negotiation team will discuss the agreement with the local presidents during the week of February 19.
3. On or about February 28, the President of Council 252 and the Assistant Secretary will sign a joint cover note that will be sent out to all staff with a copy of the agreement.
4. On or about February 28, the agreement and cover note will be forwarded to all staff by the negotiation team.
5. On or about February 28, management will reconfirm the interest of grade 15 employees in any of the Enforcement Coordinator positions.
6. On or about March 1, the Assistant Secretary will provide to the local presidents the names of any individuals interested in the Enforcement Coordinator position in their division.
7. On or about March 8, the Deputy Assistant Secretary and the appropriate Enforcement Director will consult with the local presidents in each of the four divisions about the individuals who have expressed interest in being reassigned to these positions.
8. On or about March 11, the Deputy Assistant Secretary will announce the names of the individuals who will be reassigned to these positions.

## **Appendix A: Executive Order 12871 of October 1, 1993, Labor Management Partnerships**

The involvement of Federal Government employees and their union representatives is essential to achieving the National Performance Review's government reform objectives. Only by changing the nature of Federal labor-management relations so that managers, employees, and employees' elected union representatives serve as partners will it be possible to design and implement comprehensive changes necessary to reform government. Labor-management partnerships will champion change in Federal Government agencies to transform them into organizations capable of delivering the highest quality services to the American people.

By the authority vested in me as President by the Constitution and the laws of the United States, including section 301 of title 3, United States Code, and in order to establish a new form of labor-management relations throughout the executive branch to promote the principles and recommendations adopted as a result of the National Performance Review, it is hereby ordered:

### **Section 1. The National Partnership Council**

(a) **Establishment and Membership.** There is established the National Partnership Council ("Council"). The Council shall comprise the following members appointed by the President:

- (1) Director of the Office of Personnel Management ("OPM");
  - (2) Deputy Secretary of Labor;
  - (3) Deputy Director for Management, Office of Management and Budget;
  - (4) Chair, Federal Labor Relations Authority;
  - (5) Federal Mediation and Conciliation Director;
  - (6) President, American Federation of Government Employees, AFL-CIO;
  - (7) President, National Federation of Federal Employees;
  - (8) President, National Treasury Employees Union;
  - (9) Secretary-Treasurer of the Public Employees Department, AFL-CIO; and
  - (10) A deputy Secretary or other officer with department- or agency-wide authority from two executive departments or agencies (hereafter collectively "agency"), not otherwise represented on the Council.
- Members shall have 2-year terms on the Council, which may be extended by the President.

(b) **Responsibilities and Functions.** The Council shall advise the President on matters involving labor-management relations in the executive branch. Its activities shall include:

- (1) Supporting the creation of labor-management partnerships and promoting partnership efforts in the executive branch, to the extent permitted by law;
- (2) proposing to the President by January 1994 statutory changes necessary to achieve the objectives of this order, including legislation consistent with the National Performance Review's recommendations for the creation of a flexible and responsive hiring system and the reform of the General Schedule classification system;
- (3) collecting and disseminating information about, and providing guidance on, partnership efforts in the executive branch, including results achieved, to the extent permitted by law;
- (4) utilizing the expertise of individuals both within and outside the Federal Government to foster partnership arrangements; and
- (5) working with the President's Management Council toward reform consistent with the National Performance Review's recommendations throughout the executive branch.

### **(c) Administration.**

(1) The President shall designate a member of the Council who is a full-time Federal employee to serve as Chairperson. The responsibilities of the Chairperson shall include scheduling meetings of the Council.

(2) Council shall seek input from nonmember Federal agencies, particularly smaller agencies. It also may, from time to time, invite experts from the private and public sectors to submit information. The Council shall also seek input from companies, nonprofit organizations, State and local governments, Federal Government employees, and customers of Federal Government services, as needed.

(3) To the extent permitted by law and subject to the availability of appropriations, OPM shall provide

such facilities, support, and administrative services to the Council as the Director of OPM deems appropriate.

(4) Members of the Council shall serve without compensation for their work on the Council, but shall be allowed travel expenses, including per diem in lieu of subsistence, as authorized by law, for persons serving intermittently in government service.

(5) All agencies shall, to the extent permitted by law, provide to the Council such assistance, information, and advice as the Council may request.

**(d) General.**

(1) I have determined that the Council shall be established in compliance with the Federal Advisory Committee Act, as amended (5 U.S.C. App. 2).

(2) Notwithstanding any other executive order, the functions of the President under the Federal Advisory Committee Act, as amended, except that of reporting to the Congress, that are applicable to the Council, shall be performed by the Director of OPM, in accordance with guidelines and procedures issued by the Administrator of General Services.

(3) The Council shall exist for a period of 2 years from the date of this order, unless extended.

(4) Members of the Council who are not otherwise officers or employees of the Federal Government shall serve in a representative capacity and shall not be considered special government employees for any purpose.

**Section 2. Implementation of Labor-Management Partnerships Throughout the Executive Branch.** The head of each agency subject to the provisions of chapter 71 of title 5, United States Code shall:

(a) create labor-management partnerships by forming labor-management committees or councils at appropriate levels, or adapting existing councils or committees if such groups exist, to help reform government;

(b) involve employees and their union representatives as full partners with management representatives to identify problems and craft solutions to better serve the agency's customers and mission;

(c) provide systematic training of appropriate agency employees (including line managers, first line supervisors, and union representatives who are Federal employees) in consensual methods of dispute resolution, such as alternative dispute resolution techniques and interest-based bargaining approaches;

(d) negotiate over the subjects set forth in 5 U.S.C. 7106(b)(1), and instruct subordinate officials to do the same; and

(e) evaluate progress and improvements in organizational performance resulting from the labor-management partnerships.

**Section 3. No Administrative or Judicial Review.** This order is intended only to improve the internal management of the executive branch and is not intended to, and does not, create any right to administrative or judicial review, or any other right, substantive or procedural, enforceable by a party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

William J. Clinton

THE WHITE HOUSE,  
October 1, 1993.

Office of the Assistant Secretary

Assistant Secretary

\*Chief of Staff

\*Deputy Assistant Secretary  
for  
Policy

\*Deputy Assistant Secretary  
for  
Enforcement

\*Enforcement Director  
East

\*Enforcement Director  
West

\*Resource  
Management  
Group

\*Program Legal  
Group

Eastern  
Division

\*Enforcement  
Coordinator

Boston  
New York  
Philadelphia

Southern  
Division

\*Enforcement  
Coordinator

Atlanta  
Dallas  
Washington

Midwestern  
Division

\*Enforcement  
Coordinator

Chicago  
Cleveland  
Kansas

Western  
Division

\*Enforcement  
Coordinator

Denver  
San Francisco  
Seattle

\* Assistant Secretary's Council Members

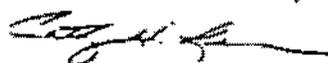
# MEMORANDUM

UNITED STATES DEPARTMENT OF EDUCATION

WASHINGTON, D.C. 20202-\_\_\_\_\_

OCT 17 1997

TO : All OCR Headquarters Staff

FROM : Cathy H. Lewis   
Director  
Executive Operations Staff

SUBJECT : OCR Headquarters and Metro Reorganization Proposals

Attached for your information are the reorganization proposals for the OCR Headquarters Office and the Washington D.C. Enforcement Office (Metro). We have made clarifications to the staffing patterns and functional statements in response to comments and questions raised by OCR staff. The following notes are to clarify some of the information in the proposed staffing patterns:

- During the implementation of the new Headquarters and Metro structures, after each employee is reassigned to one of the teams of his/her preference, an employee may be detailed to unclassified duties if the new position description for his/her position has not been classified.
- Employees on career ladders will retain their career ladders.
- In the staffing patterns, slashes (/) indicate career ladders, however, the positions may be filled at any of the indicated grade levels.
- In the staffing patterns, grades in parentheses represent additional grade levels at which positions can be filled.
- The career ladder for EOAs, Management/Program/Budget Assistants, and Office Automation Assistants is GS-5/6/7. If any of the GS-8s in headquarters are interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.
- Employees who are GS-7s will be laterally reassigned to Assistant positions on one of their teams of choice. Employees who are GS-5s or GS-6s will be detailed to unclassified duties on one of the teams of their choice at their current grade level. Shortly thereafter, the remaining career ladder Assistant positions will be advertised and filled through the competitive process.
- The career ladder for EOSs and Management/Program Analysts is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled.



SECTIONS

- I. MISSION AND RESPONSIBILITIES
- II. ORGANIZATION
- III. ORDER OF SUCCESSION
- IV. FUNCTIONS AND RESPONSIBILITIES OF OCR COMPONENTS
  - A. IMMEDIATE OFFICE OF THE ASSISTANT SECRETARY
  - B. POLICY, ENFORCEMENT, AND PROGRAM SERVICE
  - C. PLANNING, ANALYSIS, AND SYSTEMS SERVICE
  - D. REGIONAL OFFICES (REGIONS I - X)
- V. PRIMARY DELEGATIONS OF AUTHORITY

I. MISSION AND RESPONSIBILITIES

The Assistant Secretary for Civil Rights serves as the principal advisor to the Secretary on civil rights matters. The Office directs, coordinates, and recommends policy for activities that are designed to:

- o Administer the provisions of legislation and Departmental policy prohibiting discrimination on the basis of race, color, national origin, sex, handicap, or age.
- o Develop and recommend the adoption of regulations and policies of general applicability regarding civil rights.
- o Conduct investigations and negotiations to secure voluntary compliance and conduct administrative enforcement proceedings to secure compliance with legislative and regulatory civil rights requirements.
- o Conduct research and surveys on civil rights issues and on the participation of minorities, women, the aged, and handicapped persons in Federally assisted education programs.
- o Assist other Departmental offices in developing and implementing plans to meet civil rights objectives.

- o Assist recipients of Departmental funding to understand their responsibilities consistent with statutory and regulatory requirements.
- o Assist beneficiaries of programs and activities that receive Departmental funding to understand their rights consistent with statutory and regulatory provisions.

## II. ORGANIZATION

The Office for Civil Rights is under the supervision of the Assistant Secretary for Civil Rights, who reports directly to the Deputy Secretary and the Secretary of Education. The Assistant Secretary for Civil Rights provides overall direction, coordination, and leadership to the following major elements:

- o Policy, Enforcement, and Program Service
- o Planning, Analysis, and Systems Service
- o Regional Offices (Regions I - X)

In addition, an Executive Operations Staff reports to the Assistant Secretary and the Deputy Assistant Secretary.

## III. ORDER OF SUCCESSION

The following officials, in the order shown, will act as Assistant Secretary for Civil Rights during the absence or disability of the Assistant Secretary:

Deputy Assistant Secretary; and

Director, Policy, Enforcement, and Program Service.

IV. FUNCTIONS AND RESPONSIBILITIES OF OCR COMPONENTS

A. IMMEDIATE OFFICE OF THE ASSISTANT SECRETARY (EC)

The Immediate Office of the Assistant Secretary includes a Deputy Assistant Secretary, who assists the Assistant Secretary in the oversight responsibilities for two Headquarters Services and ten Regional Offices. This Office serves as the principal advisor to the Secretary of Education on civil rights matters, sets OCR's long range priorities and National Enforcement Strategy, and manages OCR's Congressional liaison and public information activities. The Office also sets quality review and case processing integrity standards and manages the activities that implement those standards.

Also included in the Immediate Office of the Assistant Secretary is an Executive Operations Staff.

Executive Operations Staff (EC-1)

The Staff plans, develops, implements, and coordinates OCR's financial management program, including allocation, reallocation, and expenditure of resources. It conducts program analyses of ongoing expenditures to facilitate forecasting for out-years and to recommend areas for cost savings. It provides advice to the Assistant Secretary and Deputy Assistant Secretary on the financial resource requirements for implementation of the National Enforcement Strategy.

The Staff services all OCR components in headquarters and the regions and provides authoritative advice and support to OCR managers on a wide range of management and administrative issues, including procurement, ADP systems security, contracts, travel, reorganizations, delegations of authority, timekeeping; and serves as OCR's liaison with the Department on these matters. It also serves as OCR's audit liaison with OIG, GAO, and other Department and Government offices, in reviewing, or coordinating the review of, audits and similar reports. The Staff also has primary OCR-wide responsibility for human resource management, including all personnel systems, EEO, labor relations, and employee development/nonprogram training activities. The Staff serves as principal liaison with the Department's Labor Relations Branch, advises the Assistant Secretary on labor-management issues, and coordinates OCR negotiations on staff-related matters. The Staff reviews for the Assistant Secretary and Deputy Assistant Secretary employee grievances and EEO complaints; analyzes examiners' findings; and develops proposals to accept, modify, or reject examiners' recommendations.

The Staff, through its Executive Secretariat, is responsible for the control and executive review of correspondence and documents flowing into and out of the

Office, and for providing authoritative advice and assistance to OCR managers and staff on the preparation of executive correspondence and documents.

The Staff prepares or coordinates responses to incoming correspondence, including requests for information under the Freedom of Information and Privacy Acts; maintains all official OCR files; and manages the OCR library of letters of findings.

The Staff is headed by a Director, who serves as OCR's Executive Officer and reports to the Assistant Secretary through the Deputy Assistant Secretary.

The Staff is divided into three Units:

Budget Planning and Management Unit;  
Management Analysis and Support Unit; and  
Executive Secretariat.

#### Budget Planning and Management Unit (EC-11)

In performing its responsibilities, the Unit:

- o Plans, coordinates, formulates, and executes OCR's budget.
- o Provides in-depth program analyses to support budget requests, facilitate budget forecasting, evaluate ongoing expenditures, and identify areas for cost savings.
- o Prepares supporting data (e.g., briefing materials, testimony, and justifications) for use at Congressional hearings and for responding to Congressional inquiries on budget-related issues.
- o Designs and executes annual and quarterly financial operating plans for all headquarters and regional components.
- o Develops budgetary policies and procedures.
- o Certifies fund availability; inputs obligations into the Department accounting system; maintains appropriate fiscal records; and reports on expenditures and obligations.
- o Establishes, maintains, and oversees systems of financial control, and provides guidance to regions and headquarters components regarding sound fiscal management techniques and systems.
- o Reviews and analyzes all fiscally oriented plans required of OCR (e.g., contract and ADP plans) to ensure consistency with budgetary objectives.

- o Initiates cost savings proposals in headquarters and the regions based on monitoring and analyses of components' expenditures.
- o Determines financial resources needed to accomplish the objectives of OCR's long-range National Enforcement Strategy.

Management Analysis and Support Unit (EC-12)

In performing its responsibilities, the Unit:

- o Manages OCR's personnel processes, including GPAS, PMRS, awards, standards of conduct, outside activities, timekeeping, EEO, and labor relations, and serves as liaison with OCR regional offices and Departmental specialists on these matters.
- o Develops and is responsible for personnel policies, programs, and procedures to effectively meet current and long-range OCR staffing needs consistent with Department and OPM guidance; manages OCR's ceiling control and FTE accounting system for each headquarters component and regional office.
- o Serves as liaison with the Department's labor relations and EEO staffs; reviews employee grievances and EEO complaints, analyzing examiners' findings and develops proposals on accepting, modifying, or rejecting examiners' recommendations.
- o Provides authoritative advice to OCR managers in headquarters and the regions on general personnel and other human resources issues and on the full gamut of administrative issues; prepares reports required by the Department or internally and comments on proposed administrative directives, procedures, and regulations related to these matters (e.g., EEO, staffing, travel).
- o Conducts analyses and develops, implements, and coordinates procedures for the efficient management of space, telephones, furniture, equipment, ADP systems security, supplies, facilities, safety, office moves, and travel, as well as handling procurement activities in these areas as appropriate for headquarters and the regions.
- o Identifies problems and issues affecting existing or proposed administrative policies or practices; prepares analyses and issue papers offering recommendations; may establish study teams for addressing cross-cutting issues.

- o Initiates recommendations for and analyzes all requests for changes to organizational structure; coordinates OCR's delegations of authority with the Department's Office of Human Resources and Administration (OHRA); develops or reviews OCR position descriptions and functional statements.
- o Serves as OCR's audit liaison with OIG, GAO, and other Department or Government offices in reviewing, or coordinating the review of, audits and similar reports.
- o Facilitates OCR's employee development and nonprogrammatic training activities, including those involving liaison and coordination with HMLC or those procured through contract.
- o Coordinates all OCR contracts, serves as liaison with the Department's OHRA and provides advice to OCR managers on policies and procedures governing procurement and monitoring.

#### Executive Secretariat (EC-13)

In performing its responsibilities, the Executive Secretariat:

- o Serves as point of contact with Secretary's Executive Secretariat.
- o Reviews all incoming correspondence to OCR headquarters; determines necessary action, and assigns responsibility and due date to appropriate component; maintains a computerized tracking system; monitors and reports on the status of all correspondence and assignments.
- o Prepares responses to a variety of incoming correspondence, coordinating, as appropriate, with regional offices and with headquarters components.
- o Formulates and implements a system of OCR responses to FOIA and Privacy Act requests, including directly responding to most requests or, in the case of complex requests involving legal judgments or highly technical matters, coordinating responses with appropriate components.
- o Maintains OCR's library of letters of findings (LOFs); manages retrieval systems for access to documents; reviews LOFs for interface with the Policy Codification System.
- o Conducts studies to determine the quality and effectiveness of correspondence procedures by assessing the accuracy, quality, and clarity of random samples of replies prepared OCR-wide.

- o Conducts executive review of correspondence requiring concurrence or signature of the Assistant Secretary or Deputy Assistant Secretary; processes and dispatches all correspondence and documents signed by the Assistant Secretary and Deputy Assistant Secretary.
- o Ensures that OCR correspondence procedures and manuals are consistent with Departmental guidelines; revises as appropriate and disseminates updates; provides guidance to specific components as needed.
- o Manages the headquarters central mail facility, including facsimile and electronic mail transmissions.
- o Maintains official OCR files, historical records, and archives; uses microfilm, microfiche, or other systems to retire and retrieve documents.
- o As requested, prepares or assists other components in the preparation or coordination of briefing packages.

## B. POLICY, ENFORCEMENT, AND PROGRAM SERVICE (ECA)

The Policy, Enforcement, and Program Service is responsible for overseeing all aspects of OCR's program policy development and dissemination and for providing policy, programmatic, and legal guidance and support to the Regional Offices and other OCR components. The Service serves as OCR's principal liaison with the Office of the General Counsel and the Department of Justice on all case-related and legal matters.

The Service recommends cases for enforcement, conducts administrative proceedings, and provides support for Federal court litigation. It is also responsible for programmatic training for OCR staff engaged in compliance and enforcement activities and for directing OCR's technical assistance program to facilitate voluntary compliance. The Service is responsible for overseeing OCR's law library.

The Service is under the direction of a Director and a Deputy Director. The Director reports to the Assistant Secretary through the Deputy Assistant Secretary. The office provides overall direction and coordination to one Staff and three Divisions:

Litigation Staff;  
Elementary and Secondary Education Policy Division;  
Postsecondary Education Policy Division; and  
Program Operations Division.

### Litigation Staff (ECA-1)

The Litigation Staff has primary responsibility for conducting administrative litigation against recipients in which OCR is a party and for representing OCR in judicial litigation in Federal and State courts. The Staff provides authoritative advice to all of OCR concerning case-related enforcement matters and provides guidance and training to other OCR staff who participate in litigation activities.

In performing its responsibilities, the Staff:

- o Conducts administrative proceedings against recipients to correct violations of the civil rights laws.
- o Reviews enforcement cases for legal sufficiency and conformance with established enforcement procedures.
- o Prepares and reviews motions, briefs, pleadings, and other legal documents on case-related matters.
- o Serves as liaison to the Office of the General Counsel and the Department of Justice on case-related matters.
- o Provides support for Federal court litigation.

- o Manages OCR's litigation support contract.
- o Develops guidance materials and provides training in litigation techniques.
- o Prepares headquarters responses and reviews regional responses to non-routine requests and appeals under the Freedom of Information and Privacy Acts.

Elementary and Secondary Education Policy Division (ECAA)

The Division develops regulations, guidelines, legal standards, and policies pertaining to civil rights compliance, the conduct of complaint investigations and compliance reviews, and the provision of technical assistance. The Division prepares and disseminates materials and information in a variety of formats to audiences both within and outside OCR for the purpose of explaining OCR policy, regulations, and related legal concepts and case law. The Division manages a program of inter- and intra-departmental coordination in the areas of policy and technical assistance.

The Division is divided into three Branches:

ESE Policy Development Branch A (carries out its responsibilities as related to Section 504 of the Rehabilitation Act of 1973);

ESE Policy Development Branch B (carries out its responsibilities as related to Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, and the Age Discrimination Act); and

ESE Technical Assistance and Program Support Branch.

Elementary and Secondary Education Policy Development Branch A and Branch B (ECAA1 and ECAA2)

In performing its responsibilities for the institutional area of elementary and secondary education in its assigned statutory area, each Branch:

- o Develops policies, legal standards, guidelines, and regulations pertaining to civil rights compliance, the conduct of complaint investigations and compliance reviews, and the provision of technical assistance.
- o Identifies areas in which the development of legal standards and policies is needed.

- o Conducts research to support legal standards and policy development.
- o Reviews cases involving findings of noncompliance for legal sufficiency and conformance with OCR policies and procedures.
- o Assists regional staff in interpreting legal standards and regulations and in applying OCR policy to ensure consistency of application.
- o Reviews the Department's and other agencies' regulations and proposed legislation to ensure conformance with civil rights requirements.
- o Develops materials and conducts training for regional offices on new and emerging policy and legal issues.
- o Presents OCR's policies to intra- and inter-departmental entities and to national organizations.
- o Reviews technical assistance and training materials for conformance with legal requirements.

Elementary and Secondary Education Technical Assistance and Program Support Branch (ECAA3)

In performing its responsibilities for the institutional area of elementary and secondary education, the Branch:

- o Develops investigative guidance, manuals, technical assistance, and training materials for OCR staff engaged in compliance and technical assistance activities.
- o Provides training on established policy and procedures.
- o Develops memoranda of understanding with other governmental agencies and Departmental components covering intra- and inter-departmental policy and technical assistance coordination.
- o Develops and implements systems for the dissemination of policy guidance and training and technical assistance materials to the regional offices and other OCR components.
- o Designs and manages an OCR-wide faculty development program covering a wide range of civil rights issues.
- o Develops and monitors technical assistance contracts.

- o Maintains on-going liaison with regions to assist them in carrying out their technical assistance programs most effectively.
- o Provides technical assistance to individuals and groups representing recipients and beneficiaries, both in response to requests and as a result of outreach initiatives, including preparation of technical assistance presentation material for these audiences.
- o Develops proposals for enhancing OCR's technical assistance program.
- o Coordinates, as appropriate, and reports on the Memoranda of Understanding between OCR regional offices and civil rights organizations.

#### Postsecondary Education Policy Division (ECAB)

The Postsecondary Education Policy Division has the same basic responsibilities and carries out the same activities as the Elementary and Secondary Education Policy Division, except that its functions are related to institutions of higher education and vocational rehabilitation.

The Division is divided into two Branches:

PSE Policy Development Branch; and  
PSE Technical Assistance and Program Support Branch.

#### Postsecondary Education Policy Development Branch (ECAB1)

The responsibilities and activities of this Branch are the same as those of the Policy Development Branches in the Elementary and Secondary Policy Division, except that its functions are related to institutions of higher education and vocational rehabilitation and deal with all statutory areas that OCR is responsible for enforcing.

#### Postsecondary Education Technical Assistance and Program Support Branch (ECAB2)

The responsibilities and activities of this Branch are the same as those of the Technical Assistance and Program Support Branch in the Elementary and Secondary Policy Division, except that its functions are related to institutions of higher education and vocational rehabilitation.

## Program Operations Division (ECAC)

The Division determines the compliance status of recipients with respect to a number of civil rights program areas: Magnet Schools Assistance Program, Vocational Education Methods of Administration Program, and statewide higher education desegregation plans. The Division plans and conducts compliance reviews, particularly on novel issues, and, as needed, may conduct complaint investigations to assist regional offices.

The Division is divided into two Branches:

Program Operations Branch A (carries out its responsibilities with respect to programs, activities, and institutions that fall within the geographical area of Regions I through V); and

Program Operations Branch B (carries out its responsibilities with respect to programs, activities, and institutions that fall within the geographical area of Regions VI through X).

### Program Operations Branch A and Branch B (ECAC1 and ECAC2)

In performing its responsibilities for its assigned geographical area, each Branch:

- o Evaluates annual civil rights compliance reports submitted by the states pursuant to implementing their Methods of Administration agreements under the Vocational Education Guidelines, to determine the compliance status of each state.
- o Determines the compliance status of applicants for assistance under the Magnet Schools Assistance Program.
- o Oversees the statewide systems of higher education desegregation plans, providing guidance to regional offices and evaluating recommendations regarding the compliance status of each state.
- o Conducts compliance review investigations on high priority or precedent-setting issues.
- o Recommends, implements, and monitors OCR's delegations of civil rights authority with other Government agencies.
- o Reviews requests for religious exemptions from institutions and prepares recommendations for approval or disapproval.

- o May conduct complaint investigations to assist regional offices that have a temporary complaint overload.

## C. PLANNING, ANALYSIS, AND SYSTEMS SERVICE (ECB)

The Planning, Analysis, and Systems Service is responsible for OCR's operational planning efforts, ensuring that the Assistant Secretary's long-range priorities are translated into fiscal year goals and objectives; and for evaluating OCR's efficiency and effectiveness in meeting those goals.

The Service is responsible for developing, maintaining, and monitoring OCR information systems and for providing authoritative advice and assistance to all of OCR on technological matters. It also is responsible for analyzing and reporting on OCR workload activities to audiences within and outside OCR.

The Service designs in-depth civil rights surveys, analyzes the resultant data, and develops and implements a system for the dissemination of the data, both within OCR and to other interested parties. It provides statistical support for OCR compliance activities, such as extremely complex compliance reviews or complaint investigations involving the collection and analysis of voluminous data. Statistical and methodological guidance is also provided to all of OCR for a variety of other purposes, such as techniques for the analysis and interpretation of quantitative data collected in conjunction with management studies.

The Service is under the direction of a Director and a Deputy Director. The Director reports to the Assistant Secretary through the Deputy Assistant Secretary. The office provides overall direction and coordination to two Divisions:

Planning and Analysis Division; and  
Information Systems and Surveys Division.

### Planning and Analysis Division (ECBA)

The Planning and Analysis Division serves as the liaison between the Planning, Analysis and Systems Service and the other components of OCR on operational planning and evaluation issues, ensuring that the Assistant Secretary's long-range goals and priorities for the agency are translated into operating plans and evaluating OCR's efficiency and effectiveness in meeting the objectives of those plans.

The Division develops, coordinates, implements, and monitors OCR's operational planning efforts; evaluates the progress of regional and headquarters components in accomplishing OCR goals and objectives; and recommends reallocation of workload or other actions to address identified problems. Evaluation and management studies and analyses are conducted to assess accomplishments, note areas needing improvements, and identify activities for future benefit to the agency. The Division is the focal point for workload and productivity analyses and reporting for the Assistant Secretary, other OCR components, and external

audiences, including preparation of major recurring reports, such as the comprehensive Year-End Report and the Annual Report to Congress.

The Division is divided into two Branches:

Operations Planning and Evaluation Branch; and  
Reports and Analysis Branch.

Operations Planning and Evaluation Branch (ECBA1)

In performing its responsibilities, the Branch:

- o Develops and coordinates OCR's operational planning systems.
- o Recommends procedures for carrying out OCR-wide goals and objectives, and reports on OCR's progress in meeting established goals and objectives.
- o Revises planning documents, as needed, to reflect changing priorities or circumstances and findings of evaluation studies.
- o Serves as regional liaison on operational planning matters.
- o Recommends realignment of workload and resources to meet OCR's goals and objectives.
- o Prepares base-year Department of Justice Implementation Plan and annual updates of the Plan.
- o Serves as OCR's focal point in support of the Department's operational planning initiatives and for evaluating proposed management/productivity improvement programs and current or proposed legislation, regulations, or directives related to management improvement programs or operations; makes recommendations regarding economy and efficiency in the administration of these programs and operations; and represents OCR with the Department, OMB, and GAO on such matters.
- o Designs and implements an internal control process, including management of OCR's ongoing efforts to prevent fraud, waste, and abuse.
- o Conducts evaluation studies, designs model projects, and makes recommendations for improving efficiency and effectiveness in OCR activities.

## Reports and Analysis Branch (ECBA2)

In performing its responsibilities, the Branch:

- o Produces monthly and other periodic reports analyzing OCR's workload and productivity.
- o Prepares the Annual Report to Congress.
- o Produces the comprehensive year-end report containing component-specific and national profiles and analyses of OCR's workload.
- o Prepares the required annual reports on Age Discrimination Act activities for Congress and the Department of Health and Human Services.
- o Responds to *ad hoc* requests from a variety of sources both within and external to OCR for quantitative analyses of workload and productivity data.
- o Retrieves, analyzes, and compiles a wide range of management information data, appropriately formatted, for a variety of recurrent purposes.
- o Prepares midpoint, final, and *ad hoc* analyses of quantitative data for PMRS purposes.

## Information Systems and Surveys Division (ECBB)

The Information Systems and Surveys Division designs, implements, maintains, and monitors information systems that collect data on all program operations; develops and implements a system to ensure that data are collected on a timely and accurate basis; and retrieves and formats data in response to recurrent and *ad hoc* management information needs. On a regular basis, the Division provides automated data processing services, guidance, and support to all of OCR. The Division makes recommendations to the Assistant Secretary concerning OCR's long-range technological needs and develops and implements a plan to address those needs.

The Division designs, conducts, and analyzes in-depth civil rights surveys; and develops and implements a system for the dissemination of civil rights survey data within OCR and to other interested parties. It provides statistical support and statistical and methodological guidance to all of OCR for myriad purposes, including support for OCR compliance activities. The Division conducts research and disseminates research findings to support the Assistant Secretary's long-range planning efforts and policy development.

The Division is divided into two Branches:

Information Systems Branch; and  
Surveys and Statistical Support Branch.

Information Systems Branch (ECBB1)

In performing its responsibilities, the Branch:

- o Conducts analyses of OCR's management information needs and designs or modifies, tests, and maintains systems and procedures to address those needs.
- o Conducts studies on OCR procedures for collecting, storing, retrieving, and analyzing information, recommending ways to reduce costs and improve quality.
- o Provides full range of support services to assist other OCR offices in the design, development, and operation of data and telecommunications systems.
- o Develops and manages OCR's Automated Data Processing and Office Automation Plans.
- o Develops and monitors contracts relating to technology.
- o Stays abreast of latest technological developments for potential application in OCR.
- o Provides training and assistance to other OCR offices on the effective use of management information systems and related technology and equipment.
- o Performs system audits, making recommendations for enhancements.
- o Coordinates with appropriate staff to develop and revise technical guidance manuals for automated systems.

Surveys and Statistical Support Branch (ECBB2)

In performing its responsibilities, the Branch:

- o Designs in-depth civil rights surveys reflecting broad-based civil rights issues, as well as conforming to state-of-the-art survey design techniques.

- o Coordinates with other Department offices and external agencies on matters involving surveys and data collection activities.
- o Develops, implements, and maintains sophisticated programs to analyze civil rights survey results.
- o Disseminates survey data to a variety of audiences, analyzing and presenting the data to address diverse purposes.
- o Develops and manages contracts related to civil rights surveys.
- o Maintains, updates, and disseminates Federal financial assistance data.
- o Develops targeting systems, using survey and other data, for a variety of compliance-related activities, such as the identification of civil rights issues and geographical locations for possible compliance reviews to be conducted by OCR regional staff.
- o Provides complex statistical analyses in support of OCR's compliance and enforcement activities, such as the analysis of voluminous data collected in connection with compliance reviews or complaint investigations.
- o Provides statistical and methodological direction and support to other OCR components, for example, in the design of evaluation studies or techniques for analyzing quantitative data collected as a result of such studies.
- o Conducts research to assess the long-range impact of external factors (e.g., demographics) on OCR's civil rights compliance responsibilities.
- o As requested, conducts nonlegal research to support the development of policy.

D. REGIONAL OFFICES (ECD1-ECDX)

The Office for Civil Rights has ten Regional Offices, each under the supervision of a Regional Director. Each Regional Office has the same general organizational structure and performs the same functions. Minor adjustments to a particular Region's structure will be accommodated, provided the Departmental office responsible for organizational structures and codes is notified and subsequently approves the change.

The Office of the Regional Director is responsible for directing the operations of the Regional Office to meet OCR program objectives, including management of its staff and financial resources. The Office implements the civil rights statutes and regulations for which OCR is responsible by conducting complaint investigations and compliance reviews; provides legal support to Regional staff; negotiates and resolves sensitive civil rights issues with high level officials; recommends cases for enforcement; provides assistance to help recipients correct noncompliance; engages in Early Complaint Resolutions; and implements a technical assistance program at the State and local levels to promote understanding of civil rights legal responsibilities.

The Office also prepares and implements the Regional budget and the Regional portion of the Annual Operating Plan and provides input on civil rights issues and supporting services to other Regional components.

The Office implements an effective communications program with key Federal, State, local, and private civil rights officials, organizations, and the general public; and recruits, selects and trains employees. The Office participates in Headquarters policy, procedure, and program development.

The Regional Offices are individually organized based upon assigned staffing and workload. The functional statements presented below represent variants upon the possible organization.

The Regional Director reports directly to the Deputy Assistant Secretary. Overall direction and coordination may be provided to two divisions and two staffs:

- Elementary and Secondary Education Division;
- Postsecondary Education Division;
- Program Review and Management Support Staff; and
- Civil Rights Attorneys Staff.

Overall direction and coordination may also be provided to one division and two staffs:

- Compliance Division;
- Program Review and Management Support Staff; and
- Civil Rights Attorneys Staff.

## Elementary and Secondary Education Division

In performing its responsibilities, the Elementary and Secondary Education Division:

- o Conducts complaint investigations and compliance reviews of preschool, elementary and secondary institutions, and vocational technical schools.
- o Determines compliance status of recipients and negotiates voluntary compliance or recommends cases for enforcement action. Provides assistance to recipients as part of the complaint investigation and compliance review process.
- o Monitors implementation of remedial action plans.
- o Represents the Regional Office in promoting understanding of OCR responsibilities and compliance programs.
- o Responds to requests for technical assistance on civil rights requirements to beneficiaries and recipients of Department of Education funds. This is done through on-site visits, public speaking engagements, training workshops, conferences and meetings, responding to requests for materials and publications, and responding to inquiries.
- o Participates annually in the identification and setting of technical assistance priorities to be addressed by OCR in the next fiscal year.
- o With other Regional Office components, advises and assists recipients to resolve issues identified during complaint investigations and compliance reviews.

## Elementary and Secondary Education Branches

The number of Elementary and Secondary Education branches (also applicable to Postsecondary branches) under a division in each Region is determined by a combination of factors such as, but not limited to, the staff allocation, the intensity of the workload, and the feasibility/manageability of handling investigations, reviews, and geographic distribution. In performing its responsibilities, each branch under the Division:

- o Conducts complaint investigations and compliance reviews of preschool, elementary and secondary institutions, and vocational technical schools.
- o Recommends findings regarding the compliance status of recipients.
- o Negotiates for voluntary compliance.

- o Recommends cases for enforcement action when appropriate.
- o Delivers technical assistance in coordination with the Technical Assistance Staff.
- o Provides assistance to recipients.
- o Monitors implementation of remedial action plans.

Each Division has a Staff or a Coordinator responsible for the delivery and coordination of technical assistance. Variation will occur from Region to Region, depending on the workload and the requirements of the Adams v. Bell decision. In Regions where there is more than one division, the technical assistance function may reside in one or more divisions.

#### Postsecondary Education Division (ECDIP-ECDXP)

The Postsecondary Education Division conducts the same general functions as the Elementary and Secondary Division except that functions are related to institutions of postsecondary education and vocational rehabilitation agencies and providers.

#### Postsecondary Education Branches

The Postsecondary Education Branches conduct the same general functions as the Elementary and Secondary Education Branches except that functions are related to institutions of postsecondary education and vocational rehabilitation agencies and providers.

#### Compliance Division

The Compliance Division combines the functions of the Postsecondary Education Division and the Elementary and Secondary Education Division. The Division has a Coordinator responsible for the delivery and coordination of technical assistance.

#### Compliance Branches

The Compliance Branches conduct the same general functions as the Elementary and Secondary Education Branches and the Postsecondary Education Branches. The number of branches depends on staffing and workload.

Program Review and Management Support Staff

Under the supervision of a Director, the Program Review and Management Support Staff:

- o Analyzes, prepares, and provides the Regional Director with information and advice concerning the meeting of OCR program and operations objectives, the number of compliance activities completed, and adherence to OCR compliance decisions and policies.
- o Coordinates the development and implementation of the Annual Operating Plan of the Regional Director.
- o Conducts Regional data collections and analyzes and monitors the completion of compliance actions within established time frames.
- o Provides essential management and administrative services related to the analysis of budget planning, personnel, reproduction, space and supply acquisition and utilization, maintenance, correspondence control, safety, and travel.
- o Assesses and assists in meeting training needs.
- o Performs complaint intake, including determination of jurisdiction and completeness. Determination of jurisdiction and completeness may involve field activities. Participates in the nomination process for compliance reviews. At the discretion of the Regional Director, initiates the Early Warning Complaint Resolution process and performs investigative and compliance review field activities.
- o Provides Regional input to the OCR management information system.
- o Provides liaison with Headquarters quality assurance functions including follow-up and monitoring.
- o Assists the Regional Director in the implementation of collective bargaining agreement and labor relations.

Civil Rights Attorneys Staff

Under the direction of the Regional Director, the Chief Regional Attorney and subordinate legal staff serve as legal counsel on legal and policy issues of high visibility and delicacy and provide legal guidance, advice, and support to the Regional Office. The Civil Rights Attorneys Staff provides final legal case review and reviews for legal sufficiency cases and other matters resolved

# MEMORANDUM

UNITED STATES DEPARTMENT OF EDUCATION  
WASHINGTON, D.C.

SEP 22 1995

TO : Rodney McCowan  
Assistant Secretary  
for Management

FROM : Norma V. Cantú  
Assistant Secretary  
for Civil Rights



SUBJECT: Office for Civil Rights Headquarters Reorganization Package

Attached is the proposed reorganization package for the Office for Civil Rights (OCR), headquarters. Headquarters components have been reorganized in a structure that meets the priorities of the Secretary and the National Performance Review. The proposal eliminates unnecessary/duplicative administrative and programmatic functions, while enabling a reduced number of headquarters staff to give direct support to the Enforcement Divisions that perform the core business of the agency. Fifty-five positions, formerly in headquarters will be used to form the Washington, D.C. regional office (Metro).

The old structure consisted of two multi-layered Services and one Staff. The proposed structure consists of a Resource Management Component (four teams) and a Program Legal Component (three teams). The Human Resources Component contains a Customer Service Team that provides a wide range of authoritative informational services, including ombudsman service to the public; an Information Technology Team that designs, implements maintains and monitors information systems; a Human Resource Team that has primary responsibility for OCR's human resource management as well as providing authoritative advice and support to staff on a wide range of management and administrative issues; and a Budget and Planning Support Team that plans, develops, implements, and coordinates OCR's financial management program, including ensuring that current and future expenditures support the objectives of OCR's Strategic Plan.

The Program Legal Teams, in the Program Legal Component, support OCR's strategic priorities by providing support to the Enforcement Divisions through the development of regulations, guidelines, legal standards, and policy pertaining to civil rights compliance; the conduct of complaint investigations and compliance reviews; and the provision of program training and technical assistance.

I believe that this proposal, coupled with the redesigns of the regional offices and senior management structure, will enable this agency to more effectively enforce civil rights nationwide. Please call me or Brian Ganson on 205-5413 if you have any questions. My staff will forward all of the proposed position descriptions for the headquarters reorganization to the Human Resource Group for classification next week.

## Attachments

Organizational Charts, Functional Statements, Staffing Lists (Existing)  
Organizational Charts, Functional Statements, Staffing Patterns (Proposed)

cc: OCR Senior Staff  
All AFGE Local Presidents  
Joseph V. Colantuoni, Director Human Resource Group, Office of Management

OCT 11 1995

Page 2 -- All OCR Headquarters Staff

- The career ladder for Attorneys is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled.
- There are currently 154 people in OCR Headquarters. There are 108 positions listed in the Headquarters staffing pattern and 54 positions listed in the Metro staffing pattern. There are more proposed positions that people currently on board to ensure that employees have a range of choices in Headquarters and Metro.

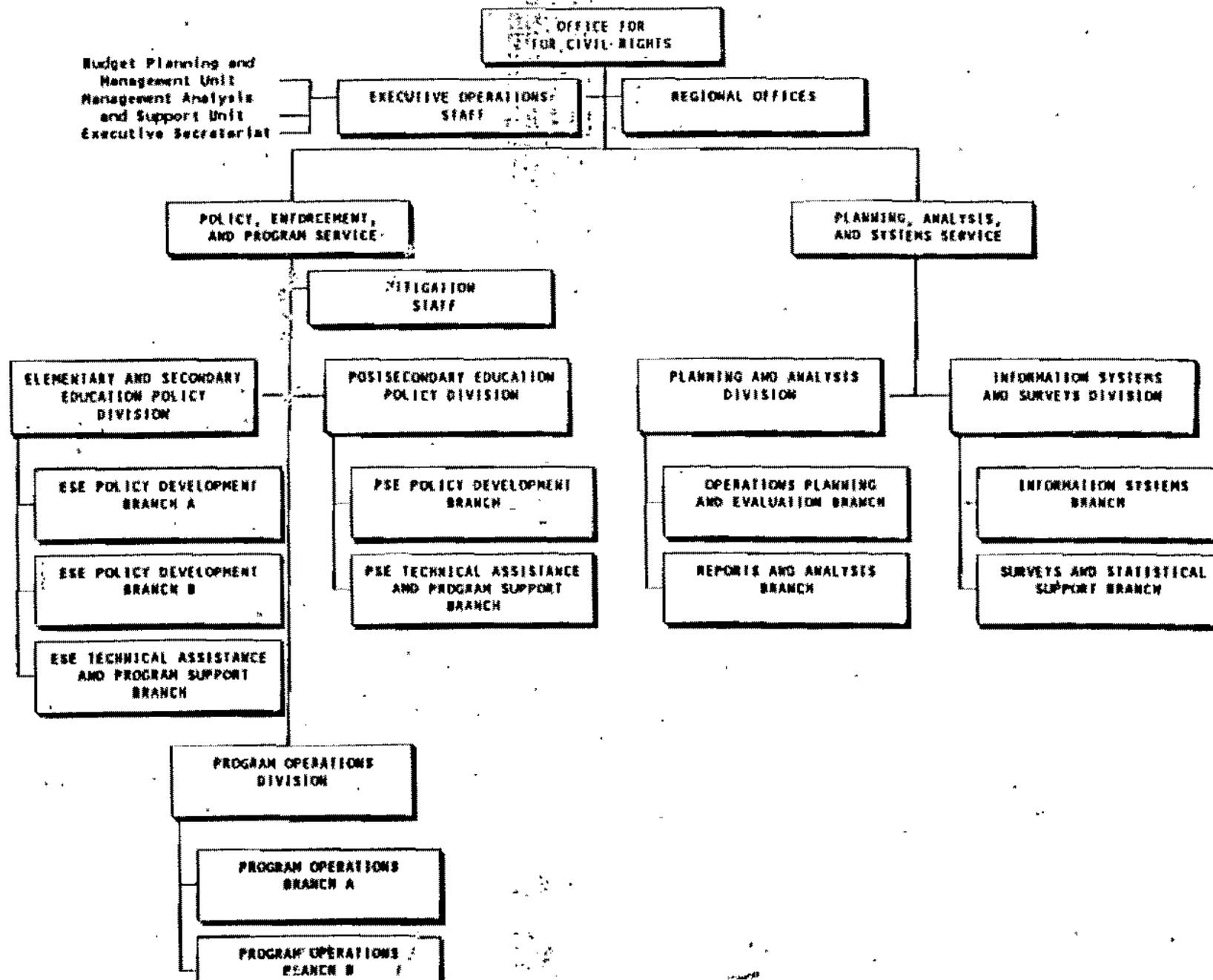
Both reorganization proposals have been submitted to OM for administrative approval. In the near future, OM will present the proposals to the Union. If you have questions, please contact me or Nick Dorka.

Attachments

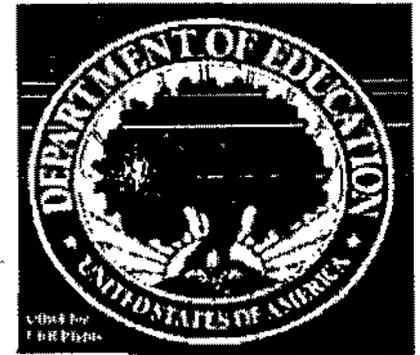
As stated

cc: Sandra W. Steed

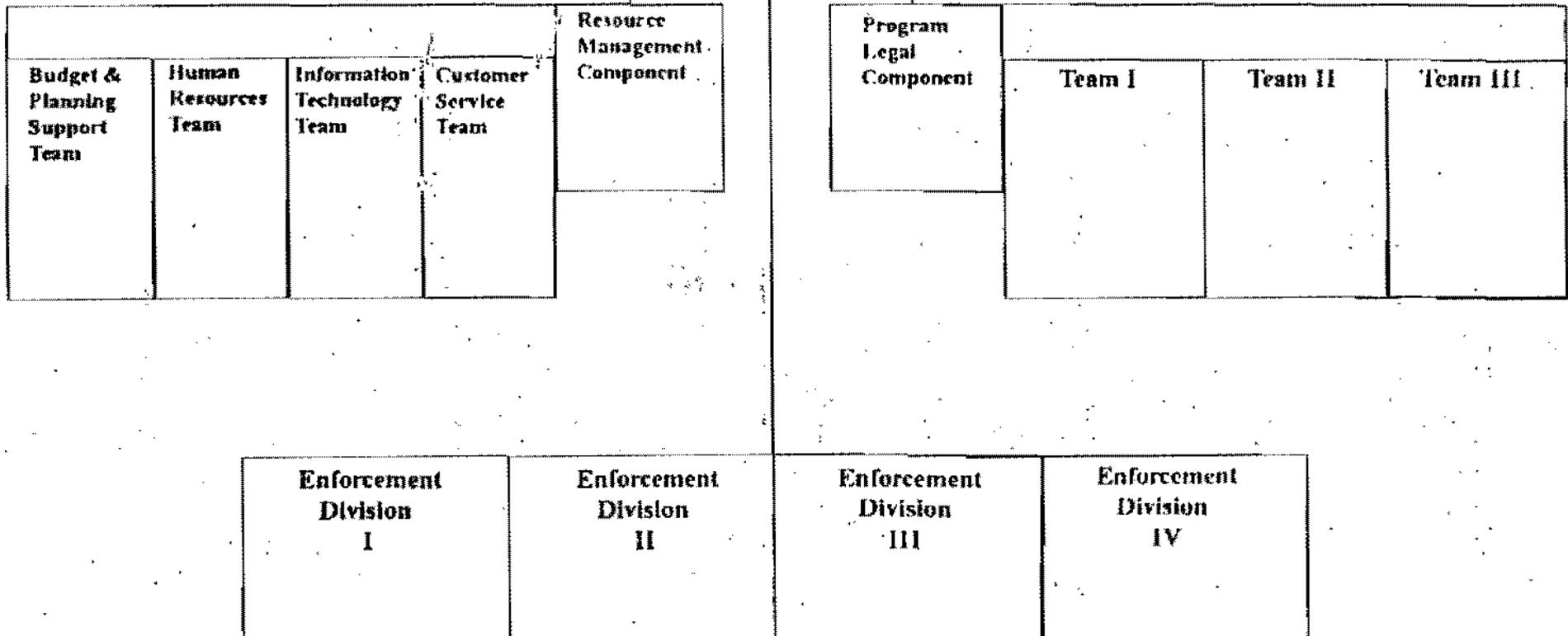
OCR II. PARTERS  
 Current Structure as of September 22, 1995



# U.S. DEPARTMENT OF EDUCATION OFFICE FOR CIVIL RIGHTS



Office of the  
Assistant Secretary  
for Civil Rights  
Deputy Assistant  
Secretary



U.S. DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS

HEADQUARTERS  
PROPOSED FUNCTIONAL STATEMENT

Immediate Office of the Assistant Secretary

The Immediate Office of the Assistant Secretary includes a Deputy Assistant Secretary (DAS) who assists the Assistant Secretary (AS) in the oversight responsibilities for the Office for Civil Rights (OCR). The Office also includes two Senior Executive Service (SES) Enforcement Directors who directly manage four Enforcement Divisions. The Enforcement Directors report directly to the AS and DAS. The Office of the Assistant Secretary serves as the principal advisor to the Secretary of Education on civil rights matters, sets the priorities in OCR's Strategic Plan, provides program objectives for OCR's national enforcement docket, and manages OCR's congressional liaison and public information activities.

Resource Management Component

The Immediate Office of the Assistant Secretary is directly supported by a Resource Management Component (RMC). The RMC supports the core business (civil rights enforcement) of the agency through the effective management of OCR's resources, including budget, human resources, technology, and customer service. The component head coordinates with the Enforcement Directors, the Associate Enforcement Directors, and the Director of the Program Legal Component, and reports directly to the AS and DAS.

The Component is headed by a Director who also serves as OCR's Executive Officer and reports directly to the AS through the DAS. The function of Principal Operating Component Negotiator for EEO/Labor Relations is in the Office of the Director. The Director's special assistant serves as principal liaison with the Department's labor relations experts, advises the AS on labor-management issues, and coordinates OCR negotiations on staff-related matters in collaboration with the Human Resources Team (HRT). The Director's Office in the RMC also has a Special Assistant and a Support Assistant. The four Component teams are:

Budget and Planning Support Team;  
Human Resource Team;  
Information Technology Team; and  
Customer Service Team.

Budget and Planning Support Team

The Budget and Planning Support Team (BPST) plans, develops, implements, and coordinates OCR's financial management program, including allocation, reallocation,

## Page 2 - Proposed OCR Headquarters Functional Statement

and expenditure of resources to support OCR's core business of civil rights enforcement. BPST conducts program analyses of ongoing expenditures to facilitate forecasting for out-years and to recommend areas for cost savings. It provides advice to the AS and DAS on the financial resource requirements for implementing OCR's Strategic Plan.

Using a team approach, BPST:

- Plans, coordinates, formulates and executes OCR's Budget.
- Provides in-depth program analyses to support budget requests, facilitate budget forecasting, evaluate ongoing expenditures, and identify areas for cost savings.
- Prepares supporting data (e.g., briefing materials, testimony, and justifications) for use at Congressional hearings and for responding to Congressional inquiries on budget-related issues.
- Designs and executes annual and quarterly financial operating plans for all headquarters and regional components.
- Develops budgetary policies and procedures.
- Certifies fund availability; inputs obligations into the Department accounting system; maintains appropriate fiscal records; and reports on expenditures and obligations.
- Establishes, maintains, and oversees systems of financial control, and provides guidance, training, and technical assistance to regions and headquarters components regarding sound fiscal management techniques and systems.
- Reviews and analyzes all fiscally oriented plans required of OCR (e.g., contract and ADP plans) to ensure consistency with budgetary objectives.
- Initiates cost saving proposals in headquarters and the regions based on monitoring and analysis of component's expenditures.
- Continually assesses the relationship of resource usage and future requirements as they relate to OCR's enforcement responsibilities, OCR's Strategic Plan and the Department's Strategic Plan. Anticipates the impact of emerging civil rights issues (e.g., Title IX athletics, affirmative action) and recommends program and budget initiatives or modifications to accommodate new issues.

## Page 3 - Proposed OCR Headquarters Functional Statement

- Supports the core business of the agency (civil rights enforcement) by ensuring that budget planning and management efforts are consistent with resource implications of all OCR programs and activities, current and future, particularly regarding the objectives of OCR's Strategic Plan.

### Human Resource Team

The Human Resource Team (HRT) services all OCR components, providing authoritative advice and support to OCR managers and staff on a wide range of management and administrative issues that support the core business of the agency. HRT has primary responsibility for human resource management including all personnel systems; reorganizations, delegations of authority; EEO and labor relations (in collaboration with the Director's Special Assistant); employee development/nonprogram training activities; and timekeeping. HRT serves as OCR's audit liaison with OIG, GAO, and other Department and Federal Offices in reviewing, or coordinating the review of, audits and similar reports. Other responsibilities include procurement, ADP systems security, contracts management or coordination, and travel. HRT serves as OCR's liaison with the Department on the above management and administrative matters.

Using a team approach, HRT:

- Provides authoritative advice to OCR managers on general personnel and other human resource issues and on the full range of administrative issues; prepares reports required by the Department or internally and comments on proposed administrative directives, procedures and regulations related to these matters (e.g. affirmative employment, Section 504 compliance, flexiplace)
- Manages OCR's personnel processes, including performance appraisals, awards, standards of conduct, outside activities, timekeeping, EEO/Affirmative Employment/Reasonable Accommodation, and labor relations, and serves as liaison with OCR regional offices and Departmental specialists on these matters.
- Develops and is responsible for personnel policies, programs, and procedures to effectively meet current and long-range OCR staffing needs consistent with Department and OPM guidance and with OCR's Strategic Plan. Manages OCR's ceiling control and FTE accounting system.
- Initiates recommendations for and analyzes all requests for changes to organizational structure; develops or reviews OCR position descriptions and functional statements; coordinates OCR's Delegations of Authority.

## Page 4 - Proposed OCR Headquarters Functional Statement

Serves as principal liaison with the Office of Management on all reorganization matters.

- Facilitates OCR's employee development and nonprogrammatic training activities, including those involving liaison and coordination with HMLC or those procured by contract.
- Serves as a liaison with the Department's labor relations and EEO staff; reviews employee grievances and EEO complaints, analyzes examiners' findings and develops proposals on accepting, modifying, or rejecting examiners' recommendations.
- Serves as OCR's audit liaison with Office of Inspector General, General Accounting Office, and other Department or Federal offices in reviewing, or coordinating the review of, audits and similar reports.
- Conducts analyses and develops, implements, and coordinates procedures for the efficient management of space, telecommunications, furniture, equipment, ADP systems security, supplies, facilities, safety, office moves, and travel, as well as handling procurement activities in these areas for all components.
- Coordinates all OCR contracts; serves as liaison with the Department and contractors; and provides advice to OCR managers on policies and procedures governing procurement and monitoring.
- Identifies problems and issues affecting existing or proposed administrative policies or practices; prepares analyses and issue papers offering recommendations; may establish study teams for addressing cross-cutting issues.

### Information Technology Team

The Information Technology Team (ITT) designs, implements, maintains, and monitors information systems that collect data on OCR's programmatic and management activities. ITT ensures that data are collected on a timely and accurate basis; and retrieves and formats data in response to recurrent and ad hoc management information needs. On a continuing basis, ITT provides automated data processing services, guidance, and support to all OCR components. Based on the requirements of OCR's Strategic Plan, ITT makes recommendations to AS concerning OCR's long-range technological needs and develops and implements the plan.

Using a team approach, ITT:

- Conducts analyses of OCR's management information needs and designs or modifies, tests, and maintains systems and procedures to address those needs.

## Page 5 - Proposed OCR Headquarters Functional Statement

- Conducts studies on OCR procedures for collecting, storing, retrieving, and analyzing information, recommending ways to reduce costs and improve quality; stays abreast of latest technology.
- Provides full range of support services to assist other OCR components in the design, development, and operation of data and telecommunications systems.
- Develops and manages OCR's Automated Data Processing and Office Automation Plans, including developing and monitoring contracts relating to technology.
- Provides training and assistance to other OCR offices on the effective use of management information systems and related technology and equipment.
- Performs system audits, making recommendations for enhancements.
- Coordinates with appropriate staff to develop and revise technical guidance manuals for automated systems.

### Customer Service Team

The Customer Service Team (CST) provides a wide range of authoritative informational services on OCR's enforcement program and administrative activities; CST reviews, controls, and tracks correspondence; prepares or coordinates responses to correspondence, including Freedom of Information and Privacy Act requests (coordinates with subject matter experts/teams on complex legal and policy issues); manages OCR's central mail facility; conducts customer service surveys; responds to OCR Hotline and TDD calls; operates and maintains OCR's Electronic Library, containing information on OCR's policy, legal standards, and findings; and prepares major recurring reports, e.g., the Year-End Report for the Department and the Annual Report to Congress.

#### Using a team approach, CST:

- Provides ombudsman service to the public and all OCR customers by receiving complaints on OCR matters; investigating the facts of each situation; communicating with all appropriate people to gather and exchange information; coordinating with OCR and Departmental staff to identify actions that would resolve problems and issues; assisting in initiating corrective actions; reporting to customers on the status of requests; and providing follow-up to ensure quality customer service.
- Serves as a point of contact with the Secretary's Executive Secretariat.

## Page 6 - Proposed OCR Headquarters Functional Statement

- Reviews all incoming correspondence, determines necessary action, and assigns responsibility and due date to appropriate component; maintains automated tracking system; monitors and reports on the status of all correspondence and assignments.
- Prepares responses to a variety of incoming correspondence, coordinating, as appropriate with subject matter experts and/or teams.
- Responds to FOIA and Privacy Act requests, coordinating responses with appropriate components.
- Operates and maintains OCR's Electronic Library (EL), updating information periodically; helps users (staff and the public) obtain information from the EL; provides legal research services for staff nationwide; maintains CD-ROM and hardcopy collections of information and research materials for the agency.
- Manages OCR's central mail facility, including facsimile and electronic mail transmissions.
- Maintains official OCR files, historical records, and archives; searches and retrieves files as requested; retires records as appropriate.
- Identifies public information needs and develops appropriate publications (e.g., fact sheets, pamphlets) on general matters related to OCR's program; updates existing publications; maintains inventories and coordinates republishing process; and coordinates distribution to regional sites.
- Develops and implements systems for the dissemination of policy guidance and training and technical assistance materials to other OCR components.
- Answers OCR Hotline, TDD, and general incoming calls, providing full coverage during business hours. Responds substantively to callers; following-up calls with appropriate materials, access to the EL, or arranging contact with appropriate staff. Monitors and responds to voice mail messages. Operates and maintains specialized service for difficult callers.
- Develop recurring annual reports, monthly data reports on Strategic Plan issues, and ad hoc reports requested by OCR senior managers.
- Conducts customer service surveys to identify areas, including correspondence; telephone; and mediation and investigative services that need improvement.

### Program Legal Component

The Immediate Office of the Assistant Secretary is directly supported by a Program Legal Component (PLC). The PLC supports OCR's enforcement program through the coordination, development and dissemination of program policy and in the provision of legal guidance. The PLC assists the Enforcement Divisions in the conduct of administrative proceedings. PLC develops or participates in the development and delivery of program training for OCR staff engaged in compliance and enforcement activities and provides resource development, support and coordination for OCR's technical assistance program to facilitate voluntary compliance.

The Program Legal Component consists of three Program Legal Teams. The Component head coordinates with the Enforcement Directors, the Associate Enforcement Directors and the Director of the Resource Management Component; and reports directly to the AS and DAS.

The Program Legal Director's immediate office is responsible for management of the program legal teams and coordination of program legal activities throughout OCR. It provides research and statistical support across OCR, to the extent its resources permit. Additionally, it recommends, implements, and monitors OCR's delegations of civil rights authority with other Federal agencies. To perform these functions, staff of the Program Legal Management Component includes two Statisticians, one Management/Program Analyst, and an Assistant. The Component teams address OCR strategic priorities in support of the office's enforcement efforts, for example Section 504/ADA; Within School Discrimination; Law; Desegregation; Magnet Schools; Title IX; Testing; Vocational Education; Harassment; Parental Empowerment and other issues.

### Program Legal Teams

In support of the OCR strategic priorities and in conjunction with the Enforcement Divisions, the three Program Legal Teams develop regulations, guidelines, legal standards and policies pertaining to civil rights compliance, the conduct of complaint investigations and compliance reviews, and the provision of program training and technical assistance. The Teams prepare and disseminate materials and information in a variety of formats to audiences both within and outside OCR for the purpose of explaining OCR policy, regulations, and related legal concepts and case law.

Using a team approach, each of the three Program Legal Teams:

- Prepares or assists Enforcement Divisions in preparing motions, briefs, pleadings, and other legal documents on case-related matters.
- Conducts or assists Enforcement Divisions in administrative proceedings against recipients to correct violations of the civil rights laws.

## Page 8 - Proposed OCR Headquarters Functional Statement

- Provides support for Federal court litigation, in consultation with the Enforcement Divisions.
- Advises and assists other Department components on the civil rights aspects of Department program activities.
- Develops guidance materials and provides training in litigation techniques in consultation with the Enforcement Divisions.
- Prepares or assists other OCR components in preparing responses to non-routine requests and appeals under the Freedom of Information and Privacy Acts.
- Serves as liaison to the Office of the General Counsel and the Department of Justice on case-related matters.
- Develops policies, legal standards, guidelines, and regulations pertaining to civil rights compliance, the conduct of complaint investigations, and civil rights compliance reviews, and the provision of technical assistance in consultation with the Enforcement Divisions.
- Identifies areas in which the development of legal standards and policies is needed in consultation with the Enforcement Divisions.
- Conducts research to support legal standards and policy development in consultation with the Enforcement Divisions.
- Conducts or participates in high priority or precedent setting compliance review investigations in consultation with the Enforcement Divisions.
- Assists other OCR components in the consistent interpretation and application of legal standards, regulations, and OCR policy.
- Reviews Department and other agencies' regulations and proposed legislation to ensure conformance with civil rights requirements.
- Develops investigative guidance, manuals, technical assistance and training materials for OCR staff engaged in compliance and technical assistance activities in consultation with the Enforcement Divisions.
- Develops and conducts training for OCR staff, or coordinates or participates in training development and delivery in consultation with the Enforcement Divisions.
- Presents OCR's policies to inter- and inter-departmental entities and to national organizations.

## Page 9 - Proposed OCR Headquarters Functional Statement

- Develops memoranda of understanding with other government agencies and Departmental components covering intra- and inter-departmental policy and technical assistance coordination.
- Prepares technical assistance and training materials in consultation with the Enforcement Divisions.
- Maintains on-going liaison to assist other OCR components in carrying out their technical assistance programs most effectively.
- Develops proposals for enhancing OCR's technical assistance program in consultation with the Enforcement Divisions.
- Provides technical assistance to individuals and groups representing recipients and beneficiaries, both in response to requests and as a result of outreach initiatives, including preparation of technical assistance presentation material for these audiences in consultation with the Enforcement Divisions.
- Coordinates, as appropriate, and reports on the Memoranda of Understanding between OCR components and civil rights organizations.

### Enforcement Divisions

OCR has four Enforcement Divisions, each consisting of three regional locations. Each regional location has the same general organizational structure and conducts the core business i.e. civil rights enforcement performed by Complaint Review and Compliance Teams. Each Enforcement Division is managed by a team that includes a non-supervisory Enforcement Coordinator (EC) and three Associate Enforcement Directors (AEDs). The Enforcement Division Management Teams have responsibility for coordinating the program operations and resource management of three regional site locations. In addition, they implement program initiatives and manage staff and financial resources at individual offices. The members of the Enforcement Division Management Team report directly to one of the Enforcement Directors.

### Regional Site Locations

This section of OCR's Functional Statement will be submitted to the Office of Management after the new regional structures are finalized and OCR standardizes the titles and terminology uses in mission statements and position descriptions.

OFFICE FOR CIVIL RIGHTS  
HEADQUARTERS, Washington, D.C.

PROPOSED STAFFING PATTERN - 10/12/95

Series-Grade and Job Title (Name)			Type	PD Appt Status
<b>ASSISTANT SECRETARY'S OFFICE (14)</b>				
1.	EX-301-04	Assistant Secretary	Sch C	C
2.	ES-301-00	Deputy Assistant Secretary	Sch C	C
3.	ES-905-00	Enforcement Director	FTP	U
4.	ES-905-00	Enforcement Director	FTP	U
5.	GS-301-15	Executive Assistant (Policy and Enforcement)	Sch C	U
6.	GS-301-15	Special Assistant	Sch C	U
7.	GS-905-14 or 15	Attorney Advisor (Litigation Coordinator)	FTP	U
8.	GS-301-14	Special Assistant	FTP	U
9.	GS-950-7/9	Paralegal Specialist	FTP	U
10.	GS-301-11	Confidential Assistant	Sch C	U
11.	GS-301-9	Confidential Assistant	Sch C	U
12.	GS-318-8 or 9	Secretary (Office Automation)	FTP	U
13.	GS-318-5/6/7	Secretary (Office Automation)	FTP	U
14.	GS-326-5/6/7	Office Automation Clerk	FTP	U

\* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.

\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.

\*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

	Series-Grade and Job Title (Name)	Type Appt	PD Status
<b>RESOURCE MANAGEMENT COMPONENT (3)</b>			
1.	GS-341-15 Executive Officer	FTP	U
2.	GS-343-13 Management/Program Analyst	FTP	U
3.	GS-XXX-5/6/7 Support/Assistant	FTP	U
<b>BUDGET &amp; PLANNING SUPPORT TEAM (9)</b>			
1.	GS-560-14 Supervisory Budget Analyst (Team Leader)	FTP	U
2.	GS-560-7/9/11/12(13)*** Budget Analyst	FTP	U
3.	GS-560-7/9/11/12(13)*** Budget Analyst	FTP	U
4.	GS-560-7/9/11/12 Budget Analyst	FTP	U
5.	GS-560-7/9/11/12 Budget Analyst	FTP	U
6.	GS-343-7/9/11/12(13)*** Management/Program Analyst	FTP	U
7.	GS-343-7/9/11/12 Management/Program Analyst	FTP	U
8.	GS-561-7 Budget Assistant (Office Automation)	FTP	U
9.	GS-XXX-5/6/7* Support/Assistant	FTP	U

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- \*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.
- \*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

Series-Grade and Job Title (Name)			Type Appt	PD Status
<b>HUMAN RESOURCE TEAM (12)</b>				
1.	GS-343-14	Supervisory M/P Analyst (Team Leader)	FTP	U
2.	GS-343-7/9/11/12(13)***	Management/Program Analyst	PTP	U
3.	GS-343-7/9/11/12(13)***	Management/Program Analyst	FTP	U
4.	GS-343-7/9/11/12(13)***	Management/Program Analyst	FTP	U
5.	GS-343-7/9/11/12	Management/Program Analyst	FTP	U
6.	GS-343-7/9/11/12	Management/Program Analyst	FTP	U
7.	GS-343-7/9/11/12	Management/Program Analyst	FTP	U
8.	GS-343-7/9/11/12	Management/Program Analyst	FTP	U
9.	GS-301-8/9	Personnel Support Assistant	FTP	U
10.	GS-XXX-5/6/7*	Support/Assistant	FTP	U
11.	GS-XXX-5/6/7	Support/Assistant	FTP	U
12.	GS-XXX-5/6/7	Support/Assistant	FTP	U

\* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.

\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.

\*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in-parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

Series-Grade and Job Title (Name)			Type Appt	PD Status
<b>INFORMATION TECHNOLOGY TEAM (9)</b>				
1.	GS-343-14 or 15	Supervisory M/P Analyst (Team Leader)	FTP	U
2.	GS-343-7/9/11/12(13/14/15)***	Management/Program Analyst	FTP	U
3.	GS-334-7/9/11/12(13)***	Computer Specialist	FTP	U
4.	GS-334-7/9/11/12(13)***	Computer Specialist	FTP	U
5.	GS-334-7/9/11/12(13)***	Computer Specialist	FTP	U
6.	GS-334-7/9/11/12(13)***	Computer Specialist	FTP	U
7.	GS-334-7/9/11/12(13)***	Computer Specialist	FTP	U
8.	GS-334/343-7/9/11/12(13)***	Computer Special/Manage/Program Analyst	FTP	U
9.	GS-XXX-5/6/7*	Support/Assistant	FTP	U
<b>CUSTOMER SERVICE TEAM (12)</b>				
1.	GS-343/360-14	Supervisory M/P Analyst/EOS (Team Leader)	FTP	U
2.	GS-XXX-7/9/11/12(13/14)***	Equal Opportunity Specialist/Analyst	FTP	U
3.	GS-XXX-7/9/11/12(13)***	Equal Opportunity Specialist/Analyst	FTP	U
4.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U

\* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.

\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.

\*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

	Series-Grade and Job Title (Name)		Type Appt	PD Status
5.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
6.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
7.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
8.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
9.	GS-1035-9	Public Affairs Specialist	FTP	U
10.	GS-XXX-5/6/7/8****	Support/Assistant	FTP	U
11.	GS-XXX-5/6/7	Support/Assistant	FTP	U
12.	GS-XXX-5/6/7	Support/Assistant	FTP	U

PROGRAM LEGAL MANAGEMENT COMPONENT (5)

1.	GS-905-15	Supervisory Attorney Advisor	FTP	U
2.	GS-1530-13	Statistician	FTP	U
3.	GS-101-13	Social Science Analyst	FTP	U
4.	GS-343-7/9/11/12(13)***	Management/Program Analyst	FTP	U
5.	GS-XXX-5/6/7	Support/Assistant	FTP	U

\*\*\*\* The career ladder for this position will be GS-5/6/7/8.

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\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.

\*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

Series-Grade and Job Title (Name)			Type	PD Appt Status
<b>PROGRAM LEGAL TEAM I: DESEGREGATION, MAGNET SCHOOLS (16)</b>				
1.	GS-905-15	Supervisory Attorney Advisor (Team Leader)	FTP	U
2.	GS-905-11/12/13(14/15)**	Attorney Advisor	FTP	U
3.	GS-905-11/12/13/(14)**	Attorney Advisor	FTP	U
4.	GS-905-11/12/13	Attorney Advisor	FTP	U
5.	GS-905-11/12/13	Attorney Advisor	FTP	U
6.	GS-905-11/12/13	Attorney Advisor	FTP	U
7.	GS-XXX-7/9/11/12(13/14)***	Equal Opportunity Specialist/Analyst	FTP	U
8.	GS-XXX-7/9/11/12(13)***	Equal Opportunity Specialist/Analyst	FTP	U
9.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
10.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
11.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
12.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
13.	GS-XXX-5/6/7*	Equal Opportunity Assistant	FTP	U
14.	GS-XXX-5/6/7	Equal Opportunity Assistant	FTP	U

\* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.

\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.

\*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

Series-Grade and Job Title (Name)			Type Appt	PD Status
<b>PROGRAM LEGAL TEAM II: SECTION 504/ADA, WITHIN-SCHOOL DISCRIMINATION, LAU (14)</b>				
1.	GS-905-15	Supervisory Attorney Advisor (Team Leader)	FTP	U
2.	GS-905-11/12/13(14/15)**	Attorney Advisor	FTP	U
3.	GS-905-11/12/13(14)**	Attorney Advisor	FTP	U
4.	GS-905-11/12/13	Attorney Advisor	FTP	U
5.	GS-905-11/12/13	Attorney Advisor	FTP	U
6.	GS-905-11/12/13	Attorney Advisor	FTP	U
7.	GS-XXX-7/9/11/12(13/14)***	Equal Opportunity Specialist/Analyst	FTP	U
8.	GS-XXX-7/9/11/12(13)***	Equal Opportunity Specialist/Analyst	FTP	U
9.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
10.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
11.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
12.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
13.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
14.	GS-XXX-5/6/7*	Equal Opportunity Assistant	FTP	U

\* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.

\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.

\*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS position and vice-versa.

Series-Grade and Job Title (Name)			Type Appt	PD Status
15.	GS-XXX-5/6/7	Equal Opportunity Assistant	FTP	U
16.	GS-XXX-5/6/7	Equal Opportunity Assistant	FTP	U
PROGRAM LEGAL TEAM III: T IX, TESTING, VOC ED, HARASS, PARENTAL EMPOWER (14)				
1.	GS-905-15	Supervisory Attorney Advisor (Team Leader)	FTP	U
2.	GS-905-11/12/13(14/15)**	Attorney Advisor	FTP	U
3.	GS-905-11/12/13(14)**	Attorney Advisor	FTP	U
4.	GS-905-11/12/13	Attorney Advisor	FTP	U
5.	GS-905-11/12/13	Attorney Advisor	FTP	U
6.	GS-905-11/12/13	Attorney Advisor	FTP	U
7.	GS-XXX-11/12(13/14)***	Equal Opportunity Specialist/Analyst	FTP	U
8.	GS-XXX-11/12(13)***	Equal Opportunity Specialist/Analyst	FTP	U
9.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
10.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
11.	GS-XXX-7/9/11/12	Equal Opportunity Specialist/Analyst	FTP	U
12.	GS-XXX-5/6/7*	Equal Opportunity Assistant	FTP	U

\* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.

\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.

\*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

	Series-Grade and Job Title (Name)		Type Appt	PD Status
13.	GS-XXX-5/6/7	Equal Opportunity Assistant	FTP	U
14.	GS-XXX-5/6/7	Equal Opportunity Assistant	FTP	U

The slashes (/) indicate career ladder positions; however, the positions may be filled at any of the indicated grade levels. Employees who are currently on career ladders will retain their career ladders. Secretaries, Clericals and Assistants (support staff) will be assigned to unclassified duties (on one of their three teams of choice) at the start of the reorganization. After all position descriptions are classified, support staff will be able to compete for career ladder Assistant positions on the teams of their choice.

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- \*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, General Attorneys, and Trial Attorney are eligible.
- \*\*\* The EOS/Analyst career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Management/Program Analysts can apply for EOS positions and vice-versa.

# MEMORANDUM

UNITED STATES DEPARTMENT OF EDUCATION  
WASHINGTON, D.C.

TO : Rodney McCowan  
Assistant Secretary  
for Management

SEP 22 1995

FROM : Norma V. Cantú  
Assistant Secretary  
for Civil Rights



SUBJECT: Office for Civil Rights Washington, D.C. Regional Office (Metro)  
Reorganization Package

Attached is the proposed reorganization package for the Office for Civil Rights' (OCR's) Washington, D.C. Regional Office (Metro). Metro's conception (created from 55 positions formerly in OCR headquarters) and structure (one management component and four compliance and enforcement teams) is consistent with the Secretary's priorities and the National Performance Review as it enables more staff to directly perform the core business of the agency.

I believe that this proposal, coupled with the redesigns of OCR's other regional offices, headquarters components, and senior management structure will enable this agency to more effectively enforce civil rights nationwide. Please call me or Brian Ganson on 205-5413 if you have any questions. My staff will forward all of the proposed Metro position descriptions to the Human Resource Group for classification next week.

#### Attachments

Organizational Charts, Functional Statements, Staffing Patterns (Proposed)

cc: OCR Senior Staff  
All AFGE Local Presidents  
Joseph V. Colantuoni, Director Human Resource Group, Office of Management

OCT 11 1995

U.S. DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS

WASHINGTON REGIONAL OFFICE  
(METRO)

<b>Management Component</b>				
	<b>Compliance and Enforcement Team I</b>	<b>Compliance and Enforcement Team II</b>	<b>Compliance and Enforcement Team III</b>	<b>Compliance and Enforcement Team IV</b>

U.S. DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS

WASHINGTON, D.C. REGIONAL OFFICE (METRO)  
PROPOSED FUNCTIONAL STATEMENT

Office of the Associate Enforcement Director

The Office of the Associate Enforcement Director (AED) is responsible for directing the operations of the Regional Office to meet OCR program objectives, including management of its staff and financial resources. The Office implements the civil rights statutes and regulations for which OCR is responsible by using a variety of approaches to resolve complaint investigations and compliance reviews to ensure equal access to education and to promote educational excellence through vigorous enforcement of civil rights; provides legal support to Metro staff; negotiates and resolves sensitive civil rights issues with high level officials; recommends cases for enforcement; provides assistance to help recipients correct noncompliance; engages in Early Complaint Resolution; and implements a technical assistance program at the state and local levels to promote understanding of civil rights legal responsibilities.

The Office also prepares and implements Metro's budget and its portion of the Annual Operating Plan and provides input on civil rights issues and supporting services to other offices in its own Enforcement Divisions and other Enforcement Divisions. The Office coordinates with the Resource Management Component on management and administrative matters as appropriate.

The Office implements an effective communications program with key Federal, State, local, and private civil rights officials, organizations, and the general public; and recruits, selects and trains employees. The Office participates with the Program Legal Component in policy, procedure, and program development. In the Immediate Office of the AED, there is a Chief Attorney, Program Manager, Administrative Officer, Computer Specialist position, and an Assistant Support position.

The AED coordinates with the Enforcement Division Management Team (Enforcement Coordinator and other AEDs) and reports directly to an Enforcement Director. The AED serves as rating official for the Program Manager and Chief Attorney and as approving official for the Compliance and Enforcement Team Leaders. The AED works with the Team Leaders to identify strategies for improving the functioning of the teams. The AED meets periodically with each of the teams in carrying out this responsibility. The AED serves as rating official for immediate office staff.

The Program Manager, in collaboration with other Metro managers develops and updates region-wide plans and projects, such as the Proactive Enforcement Docket, the Annual Regional Operating Plan, or the Profile, Assessment and Resolution review compliance program; analyzes, prepares, and provides the AED with information and advice concerning meeting OCR's program and operations objectives, the number of compliance activities completed, and adherence to OCR compliance

## Page 2 - Proposed Washington Regional Office Functional Statement

decisions and policies. The Program Manager assists in planning Metro's enforcement strategy, setting Metro's program priorities, managing resources and participating in management and administrative decisions concerning personnel, staff development, budget, ethics, conduct and other related matters. The Program Manager is responsible for planning and developing high quality training, Quality Improvement, and customer service programs.

The Chief Attorney makes final decisions on legal matters that cannot be resolved within the team, and meets periodically with the attorneys to promote discussions on significant legal and policy issues. The Chief Attorney ensures timely dissemination and explanation of policy and legal matters, including decisions or issues brought to his attention by the Attorneys. The Chief Attorney has primary responsibility for training legal staff.

The Administrative Officer monitors the budget and prepares necessary budget reports; provides essential management and administrative services related to the analysis of budget planning, personnel, reproduction, space and supply acquisition and utilization, maintenance, correspondence control, safety, and travel.

The Computer Specialist/Management/Program Analyst position is primarily responsible for managing the Case Information System (CIS) database, computer hardware and software; preparing and disseminating to staff internal analyses and reports from CIS; preparing and disseminating to staff analyses and reports of external data to support the proactive enforcement plan; providing specific data analysis assistance to teams conducting reviews and other proactive enforcement activities; and assisting in customer service activities.

The Assistant to the AED provides direct support to the AED and other Metro Managers. The AED provides overall direction and coordination to four case resolution teams:

### Compliance and Enforcement Teams

Each Compliance and Enforcement Team is comprised of the Team Leader, two Attorneys, six Equal Opportunity Specialists and three Support Assistant positions. Receiving leadership and support from the AED and immediate office staff, each Compliance and Enforcement Team resolves sensitive and complex civil rights complaints and compliance reviews. Functioning as a team with full delegated authority and responsibility from the AED, each Team:

- Conducts complaint investigations and compliance reviews of preschool, elementary and secondary institutions, vocational technical schools, institutions of postsecondary education, vocational rehabilitation agencies and providers under Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975, and conducts complaint investigations and compliance reviews of public entities for

### Page 3 - Proposed Washington Regional Office Functional Statement

which the U.S. Department of Education serves as the designated agency under the regulations implementing Title II of the Americans with Disabilities Act of 1990.

- Uses a variety of approaches to resolve complaints and compliance reviews to ensure equal access to education and to promote educational excellence through vigorous enforcement of civil rights.
- Provides assistance to recipients as part of the complaint investigation and compliance review process.
- Monitors implementation of remedial action plans.
- Recommends cases for enforcement when voluntary compliance cannot be achieved or when otherwise appropriate.
- Conducts proactive enforcement activities that bring resources to bear on behalf of a well-defined student population facing discrimination; develop strong, educationally sound civil rights remedies that increase educational opportunity for those students; and ensure that OCR will be prepared to move towards enforcement if results are not achieved as anticipated.
- Exercises primary State responsibility in one State to identify and foster State-wide contacts with education and civil rights organizations. The purpose of these contacts is to obtain relevant information about civil rights issues within the State, and to educate organizations about the civil rights laws.
- Responds when assigned to requests for technical assistance on civil rights requirements to beneficiaries and recipients of Department of Education funds. This is done through on-site visits, public speaking engagements, training workshops, conferences and meetings, responding to requests for materials and publications, and responding to inquiries.
- Participates annually in the identification and setting of proactive enforcement priorities to be addressed by OCR in the next fiscal year.
- Provides team input to all regional and OCR databases and reporting systems.
- With other regional site locations, advises and assists recipients to resolve issues identified during complaint investigations and compliance reviews.
- Ensures all actions are legally sufficient.

OFFICE FOR CIVIL RIGHTS  
REGIONAL OFFICE, Washington, D.C.

PROPOSED STAFFING PATTERN - 10/12/95

Series-Grade and Job Title (Name)	Type Appt	PD Status
<b>MANAGEMENT COMPONENT (6)</b>		
1. GS-360/905-15 Associate Enforcement Director (EOS/Attorney)	FTP	U
2. GS-905-14 or 15 Attorney Advisor	FTP	U
3. GS-360/905-14 or 15 Program Manager	FTP	U
4. GS-341/343-7/9/11 Administrative Officer	FTP	U
5. GS-343/334-7/9/11/12(13)***Analyst/Computer Specialist	FTP	U
6. GS-XXX-5/6/7 Support/Assistant	FTP	U
<b>INVESTIGATIVE TEAM I (12)</b>		
1. GS-360/905-14 Supervisory EOS/Attorney	FTP	U
2. GS-905-11/12/13(14)** Attorney Advisor	FTP	U
3. GS-905-11/12/13 Attorney Advisor	FTP	U
4. GS-360-7/9/11/12(13/14)***Equal Opportunity Specialist	FTP	U
5. GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U
6. GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U
7. GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U

\* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.

\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, Trial Attorneys and General Attorneys are eligible.

\*\*\* The EOS career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Analysts can apply for EOS positions and vice-versa.

	Series-Grade and Job Title (Name)		Type Appt	PD Status
8.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
9.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
10.	GS-361-5/6/7*	Equal Opportunity Assistant	FTP	U
11.	GS-361-5/6/7	Equal Opportunity Assistant	FTP	U
12.	GS-361-5/6/7	Equal Opportunity Assistant	FTP	U

INVESTIGATIVE TEAM II (12)

1.	GS-360/905-14	Supervisory EOS/Attorney	FTP	U
2.	GS-905-11/12/13(14)**	Attorney Advisor	FTP	U
3.	GS-905-11/12/13	Attorney Advisor	FTP	U
4.	GS-360-7/9/11/12(13/14)***	Equal Opportunity Specialist	FTP	U
5.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
6.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
7.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
8.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
9.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
10.	GS-361-5/6/7*	Equal Opportunity Assistant	FTP	U

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\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, Trial Attorneys and General Attorneys are eligible.

\*\*\* The EOS career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Analysts can apply for EOS positions and vice-versa.

	Series-Grade and Job Title (Name)		Type Appt	PD Status
11.	GS-361-5/6/7	Equal Opportunity Assistant	FTP	U
12.	GS-361-5/6/7	Equal Opportunity Assistant	FTP	U
<b>INVESTIGATIVE TEAM III (12)</b>				
1.	GS-360/905-14	Supervisory EOS/Attorney	FTP	U
2.	GS-905-11/12/13(14)**	Attorney Advisor	FTP	U
3.	GS-905-11/12/13	Attorney Advisor	FTP	U
4.	GS-360-7/9/11/12(13/14)***	Equal Opportunity Specialist	FTP	U
5.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
6.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
7.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
8.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
9.	GS-360-7/9/11/12	Equal Opportunity Specialist	FTP	U
10.	GS-361-5/6/7*	Equal Opportunity Assistant	FTP	U
11.	GS-361-5/6/7	Equal Opportunity Assistant	FTP	U
12.	GS-361-5/6/7	Equal Opportunity Assistant	FTP	U

**Investigative Team IV (12)**

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\*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade level at which positions can be filled. Attorney Advisors, Trial Attorneys and General Attorneys are eligible.

\*\*\* The EOS career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Analysts can apply for EOS positions and vice-versa.

	Series-Grade and Job Title (Name)	Type Appt	PD Status
1.	GS-360/905-14 Supervisory EOS/Attorney	FTP	U
2.	GS-905-11/12/13(14)** Attorney Advisor	FTP	U
3.	GS-905-11/12/13 Attorney Advisor	FTP	U
4.	GS-360-7/9/11/12(13/14)***Equal Opportunity Specialist	FTP	U
5.	GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U
6.	GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U
7.	GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U
8.	GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U
9.	GS-360-7/9/11/12 Equal Opportunity Specialist	FTP	U
10.	GS-361-5/6/7* Equal Opportunity Assistant	FTP	U
11.	GS-361-5/6/7 Equal Opportunity Assistant	FTP	U
12.	GS-361-5/6/7 Equal Opportunity Assistant	FTP	U

The slashes (/) indicate career ladder positions; however, the positions may be filled at any of the indicated grade levels. Employees who are currently on career ladders will retain their career ladders. Secretaries, Clericals and Assistants (support staff) will be assigned to unclassified duties (on one of their three teams of choice) at the start of the reorganization. After all position descriptions are classified, support staff will be able to compete for career ladder Assistant positions on the teams of their choice.

- \* The Assistant career ladder is GS-5/6/7. There are a small number of GS-8s in headquarters. If any of these individuals is interested in moving into one of these positions, OCR will work with OM Personnel to develop an appropriate position description.
- \*\* The Attorney career ladder is GS-11/12/13. Grades in parentheses represent additional grade levels at which positions can be filled. Attorney Advisors, Trial Attorneys and General Attorneys are eligible.
- \*\*\* The EOS career ladder is GS-7/9/11/12. Grades in parentheses represent additional grade levels at which positions can be filled. Analysts can apply for EOS positions and vice-versa.

U.S. DEPARTMENT OF EDUCATION  
OFFICE FOR CIVIL RIGHTS, HEADQUARTERS  
Washington, D.C.

CURRENT STAFFING LIST  
September 22, 1995

Series-Grade and Job Title (Name)			Type Appt	PD Status
<b>ASSISTANT SECRETARY'S OFFICE</b>				
1.	EX-0301-04	Assistant Secretary Cantú, Norma V.	FTP	C
2.	GS-0301-15	Executive Assistant (Policy and Enforcement) Ganson, Brian C.	FTP	C
3.	GS-0301-15	Special Assistant Coleman, Arthur L.	FTP	C
4.	GM-0301-15	Special Assistant Sobol, Francis T.	FTP	C
5.	GM-0301-14	Special Assistant Besner, Arthur	FTP	C
6.	GS-0301-11	Confidential Assistant Serrano, Nhora L.	FTP	C
7.	GS-0301-09	Confidential Assistant Brookler, Marie L.	PTP	C
8.	GS-0301-07	Secretary (Office Automation) Walker, Wayman B.	FTP	C
<b>DEPUTY ASSISTANT SECRETARY'S OFFICE</b>				
1.	ES-0301-00	Deputy Assistant Secretary Pierce, Raymond C.	FTP	C
2.	GM-0905-14	Attorney Advisor Dorka, Lilian L.	FTP	C

	Series-Grade and Job Title (Name)	Type Appt	PD Status
3.	GM-0301-14 Special Assistant Cramolini, Stephen T.		FTP C
4.	GS-0905-13 Attorney Advisor Rhett, Michelle D.		FTP C
5.	GS-318-08 Secretary (Office Automation) Kelly, Deborah A.		FTP C
6.	GS-0326-05 Office Automation Clerk Bryant, Ricardo		FTP C

EXECUTIVE OPERATIONS STAFF

1.	GS-0341-15 Administrative Officer Lewis, Cathy H.		FTP C
2.	GM-0343-13 Program Analyst Aitel, Susan J.		FTP C
3.	GS-0318-07 Secretary (Office Automation) Stover, Sandra F.		FTP C
4.	GW-0303-03 Office Automation Clerk (SIS) Pitts, Knikkia C.		PTT C

BUDGET & PLANNING MANAGEMENT UNIT

1.	GM-0560-14 Supervisory Budget Analyst Slayton, Lester C.		FTP C
2.	GS-0343-13 Program Analyst Scheer, Patricia M.		FTP C
3.	GS-0560-13 Budget Analyst Coleman, George		FTP C
4.	GS-0560-12 Budget Analyst Campbell, Carolyn T.		FTP C
5.	GS-0560-12 Budget Analyst Jackson, Nancy M.		FTP C
6.	GS-0560-12 Budget Analyst Jordan, Lavern L.		FTP C

	Series-Grade and Job Title (Name)	Type Appt	PD Status
7.	GS-0561-07 Budget Assistant (Office Automation) Robinson, Karen D.		FTP C
8.	GS-0344-06 Management Assistant Clayton, Lenora M.		FTP C
MANAGEMENT ANALYSIS & SUPPORT UNIT			
1.	GM-0343-14 Management Analyst Dorka, Nicholas F.		FTP C
2.	GS-0343-13 Management Analyst Blumenthal, Diane H.		PTP C
3.	GS-0343-13 Management Analyst Harris, Janice M.		FTP C
4.	GS-0343-12 Management Analyst Ray, Dollie M.		FTP C
5.	GS-0343-12 Management Analyst Harris, Cecelia M.		FTP C
6.	GS-0343-12 Management Analyst Jordan, Diane		FTP C
7.	GS-0303-08 Personnel Liaison Assistant Johns, Robin B.		FTP C
8.	GS-0344-07 Management Assistant Goodwin, Melvin L.		FTP C
9.	GS-0344-07 Management Assistant Thomas, Jeraldine		FTP C
10.	GS-0318-05 Secretary (Office Automation) Proctor, Estelita Y.		FTP C
EXECUTIVE SECRETARIAT			
1.	GS-0343-13 Supervisory Management Analyst Drake, Edmund D.		FTP C
2.	GS-0343-12 Management Analyst Lowder, Frances H.		FTP C

	Series-Grade and Job Title (Name)	Type Appt	PD Status
3.	GS-1035-09 Public Affairs Specialist Vaughn, Anne S.		FTP C
4.	GS-0344-07 Management Assistant Rich, Ellen T.		FTP C
5.	GS-0303-07 Correspondence Assistant Spencer-Nelson, Donna		FTP C
6.	GS-0344-05 Management Assistant Simms, Shelley J.		FTP C
7.	GS-0303-05 Management Support Assistant Downs, Charles V.		FTP C
POLICY ENFORCEMENT & PROGRAM SERVICE			
1.	ES-0905-00 Director, Policy, Enforcement, & Program Lim, Jeanette J.		FTP C
2.	GM-0905-15 Supervisory Attorney Bowers, Susan G.		FTP C
3.	GS-0343-13 Management Analyst Lyles, Rita R.		FTP C
4.	GS-0318-08 Secretary (Office Automation) Briggs, Judy A.		FTP C
5.	GS-0318-05 Secretary (Office Automation) Webb, Savannah A.		FTP C
6.	GS-0303-02 Clerk (Stay-In-School) Booker, Robin A.		FTP C
LITIGATION STAFF			
1.	GM-0905-15 Trial Attorney Leeman, David M.		FTP C
2.	GM-0905-15 Trial Attorney DeLacy, Dan R.		FTP C
3.	GS-0905-14 Trial Attorney Jacobson, Alan B.		FTP C

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	Series-Grade and Job Title (Name)	Type Appt	PD Status
4.	GS-0905-14 Trial Attorney Toliver, Jacques A.		FTP C
5.	GS-0905-13 Trial Attorney Gray, Jan D.		FTP C
6.	GS-0905-13 Trial Attorney Williams, Linda P.		PTP C
7.	GS-0905-13 Trial Attorney Shaul, Robert F.		FTP C
8.	GS-0303-07 Program Assistant (Office Automation) Monroe, Janice A.		FTP C
9.	GS-0326-05 Office Automation Clerk Williams, Cassandra		FTP C

ELEMENTARY & SECONDARY EDUCATION DIVISION

1.	GM-0905-15 Supervisory Attorney Peelen, Jean P.		FTP C
2.	GM-0360-14 Equal Opportunity Special Hoover, Rebecca E.		FTP C
3.	GS-0318-07 Secretary (Office Automation) Finch, Jean M.		FTP C

ELEMENTARY & SECONDARY ENFORCEMENT DEVELOPMENT BRANCH A

1.	GM-0905-15 Supervisory Attorney Kallen, Howard I.		FTP C
2.	GS-0905-14 Attorney Advisor Dennis, Doreen E.		PTP C
3.	GS-0905-14 Attorney Advisor Hakel, Karen E.		FTP C
4.	GS-0905-14 Attorney Advisor Hoogstraten, Anne E.		PTP C
5.	GS-0905-13 Attorney Advisor Roseberry, Stacey A.		FTP C

	Series-Grade and Job Title (Name)	Type Appt	PD Status
6.	GS-0318-06 Secretary (Office Automation) Dyson, Lisa A.		FTP C
ELEMENTARY & SECONDARY ENFORCEMENT DEVELOPMENT BRANCH B			
1.	GM-0905-15 Supervisory Attorney Hillary, Rosetta		FTP C
2.	GS-0905-14 Attorney Advisor Fitch, Rebecca A.		FTP C
3.	GS-0905-13 Attorney Advisor Goldbecker, Sheralyn		FTP C
ELEMENTARY & SECONDARY ENFORCEMENT TECHNICAL ASSISTANCE & PROGRAM SUPPORT BRANCH			
1.	GM-0343-14 Supervisory Program Analyst Wender, Alice B.		FTP C
2.	GS-0343-13 Program Analyst Tomic, Liljana L.		FTP C
3.	GS-0343-13 Program Analyst Cabey, Ursula M.		FTP C
4.	GS-0343-13 Program Analyst Fennell, Rosemary V.		FTP C
5.	GS-0343-13 Program Analyst Berkowitz, David W.		FTP C
6.	GS-0343-12 Program Analyst Bardari, Joseph A.		FTP C
7.	GS-0343-12 Program Analyst Kaba, Claudette V.		FTP C
8.	GS-0343-12 Program Analyst Ward-Wooten, Sandra		FTP C
9.	GS-0303-05 Program Assistant Barnes, Connie D.		FTP C
10.	GS-0326-04 Office Automation Clerk Byrd, April R.		FTP C

Series-Grade and Job Title (Name)			Type Appt	PD Status
11.	GS-0303-04	Reader Whitaker, Airionna S.		PTP C
POSTSECONDARY EDUCATION POLICY DIVISION				
1.	GM-0905-15	Supervisory Attorney Advisor Battle, Sandra G.		FTP C
2.	GM-0360-14	Equal Opportunity Specialist Appell, Stephen M.		FTP C
3.	GS-0318-07	Secretary (Office Automation) Rambert, Eric D.		FTP C
POSTSECONDARY EDUCATION POLICY DEVELOPMENT BRANCH				
1.	GM-0905-15	Supervisory Attorney Advisor Hanrahan, Eileen M.		FTP C
2.	GS-0905-14	Attorney Advisor Alger, Jonathan R.		FTP C
3.	GS-0905-14	Attorney Advisor Trice, Elisabeth U.		FTP C
4.	GS-0905-13	Attorney Advisor Gelissen, Peter T.		FTP C
5.	GS-0905-13	Attorney Advisor Chatman, Lorraine D.		FTP C
6.	GS-0905-13	Attorney Advisor Forman, Samatha H.		FTP C
7.	GS-0318-05	Secretary (Office Automation) Jackson, Deborah E.		FTP C
POSTSECONDARY EDUCATION POLICY TECHNICAL ASSISTMENT & PROGRAM SUPPORT BRANCH				
1.	GS-0343-13	Program Analyst Hill, Albert		FTP C
2.	GS-0343-13	Program Analyst (Training) Starling, Mary Lou		FTP C

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	Series-Grade and Job Title (Name)		Type Appl	PD Status
3.	GS-0343-13	Program Analyst Robinson, Alice B.		FTP C
4.	GS-0343-12	Program Analyst Lee, Ki C.		FTP C
5.	GS-0343-12	Program Analyst Alexander, Janice M.		FTP C
6.	GS-0343-12	Program Analyst Rodgers, Jewel E.		FTP C
7.	GS-0318-06	Secretary (Office Automation) Rush, Zelma M.		FTP C
PROGRAM OPERATIONS DIVISION				
1.	GM-0905-15	Supervisory Attorney Foster, Richard L.		FTP C
2.	GS-0905-13	Attorney Advisor Moy, Robert S.		FTP C
3.	GS-0905-12	Attorney Advisor Allen, Beverly Rice		FTP C
4.	GS-0318-07	Secretary (Office Automation) Thompkins, Versnia		FTP C
PROGRAM OPERATIONS BRANCH A				
1.	GS-0360-13	Equal Opportunity Specialist McCoy, Sharon H.		FTP C
2.	GS-0360-13	Equal Opportunity Specialist Baker, Melvin B.		FTP C
3.	GS-0360-13	Equal Opportunity Specialist Baker, Eleanor D.		FTP C
4.	GS-0360-12	Equal Opportunity Specialist Hatcher, Raymond L.		FTP C
5.	GS-0318-06	Secretary (Office Automation) Randolph, Tracey M.		FTP C

Series-Grade and Job Title (Name)			Type Appt	PD Status
<b>PROGRAM OPERATIONS BRANCH B</b>				
1.	GM-0360-14	Supervisory Equal Opportunity Specialist Wall, Nathaniel C.	FTP	C
2.	GS-0360-13	Equal Opportunity Specialist Mullen, Thomas G.	FTP	C
3.	GS-0360-12	Equal Opportunity Specialist Patterson Jr, Walter	FTP	C
4.	GS-0360-12	Equal Opportunity Specialist Dupree-Ramey, Evelyn	FTP	C
5.	GS-0360-12	Equal Opportunity Specialist Elliott, Mabel R.	FTP	C
6.	GS-0318-05	Secretary (Office Automation) Gibson, Sandra M.	FTP	C
7.	GS-0326-04	Office Automation Clerk Silva, Nyvia I.	FTP	C
<b>PLANNING ANALYSIS &amp; SYSTEMS SERVICE</b>				
1.	GM-0343-15	Supervisory Program Analyst York, Anne C.	FTP	C
2.	GM-0343-14	Program Analyst Wendell, Donald M.	FTP	C
3.	GS-0318-08	Secretary (Office Automation) Shaw, Patricia A.	FTP	C
4.	GS-0326-06	Office Automation Assistant Cambell, David A.	FTP	C
5.	GS-0303-02	Clerk (Stay-In-School) Izzard, Maureen	PTT	C
<b>PLANNING &amp; ANALYSIS DIVISION</b>				
1.	GM-0343-15	Supervisory Management & Program Analyst Fairley, Paul L.	FTP	C
2.	GS-0318-07	Secretary (Office Automation) Patterson, Barbara M.	FTP	C

Series-Grade and Job Title (Name)			Type Appt	PD Status
<b>OPERATIONS PLANNING &amp; EVALUATION BRANCH</b>				
1.	GM-0343-14	Supervisory Program Analyst Miller, Benjamin A.	FTP	C
2.	GS-0343-13	Program Analyst Scruggs, Max D.	FTP	C
3.	GS-0343-13	Management Analyst Liggins, Paula P.	FTP	C
4.	GS-0343-13	Program Analyst Al-Qaid, Ahmed T.	FTP	C
5.	GS-0343-12	Program Analyst Ariza, Maria L.	FTP	C
6.	GS-0343-12	Program Analyst Crocamo, Suzanne L.	FTP	C
6.	GS-0343-11	Program Analyst Sinha, Rita	FTP	C
7.	GS-0344-05	Management Assistant Lee, Michael G.	FTP	C
<b>REPORTS &amp; ANALYSIS BRANCH</b>				
1.	GM-0343-14	Supervisory Management Analyst Bussey, Lawrence	FTP	C
2.	GS-0343-13	Management Analyst Pottker, Janice	PTP	C
3.	GS-0343-13	Management Analyst Shepard, Bertie F.	FTP	C
4.	GS-0343-13	Management Analyst Threadgill, Gloria D.	FTP	C
5.	GS-0343-12	Management Analyst Lucas, Theodore R.	FTP	C
6.	GS-0343-12	Management Analyst Washington, Ella M.	FTP	C

	Series-Grade and Job Title (Name)	Type Appl	PD Status
7.	GS-0344-08 Management Assistant Baldwin, Connie L.		FTP C
INFORMATION SYSTEMS & SURVEYS DIVISION			
1.	GM-0343-15 Supervisory Program Analyst Seymour, Craig A.		FTP C
2.	GS-0318-07 Secretary (Office Automation) Palmer, Millie		FTP C
INFORMATION SYSTEM BRANCH			
1.	GS-0334-13 Computer Specialist Moultrie, Glennie J.		FTP C
2.	GS-0334-13 Computer Specialist Young, Rayford		FTP C
3.	GS-0334-13 Computer Specialist Hinson, David R.		FTP C
4.	GS-0334-13 Computer Specialist Wang, Ting-Ting		FTP C
5.	GS-0334-13 Computer Systems Specialist Roberts, Angela R.		FTP C
6.	GS-0334-12 Computer Specialist Middelton, Lydia D.		FTP C
7.	GS-0343-12 Management Analyst Smith Jr., Raymond W.		FTP C
8.	GS-0318-05 Secretary (Office Automation) Gaskins, William P.		FTP C
SURVEYS & STATISTICAL SUPPORT BRANCH			
1.	GS-1530-13 Statistician (Social Science) Davis, Jo Ann		FTP C
2.	GS-0343-13 Program Analyst Tuchman, Sharon H.		FTP C
3.	GS-0101-13 Social Science Analyst Kravitz, Jerome H.		FTP C

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	Series-Grade and Job Title (Name)	Type Appl	PD Status
4.	GS-0343-13 Program Analyst McCabe, Peter A.		FTP C
5.	GS-0343-12 Program Analyst Berry, Jerelyn J.		FTP C
6.	GS-0343-12 Program Analyst Powell, Lucinda H.		FTP C
7.	GS-0343-12 Program Analyst Schifferli, Mary C.		FTP C
8.	GS-0343-12 Program Analyst Edens, Wesley		FTP C

There are 154 on-board staff in OCR Headquarters as of September 22, 1995.