A Report by a Panel of the

NATIONAL ACADEMY OF PUBLIC ADMINISTRATION

For Congress and the Equal Employment Opportunity Commission

January 2007

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION'S NATIONAL CONTACT CENTER:

CHANGING TECHNOLOGY, CHANGING BUSINESS PRACTICES

Panel
Charles W. Washington, *Chair*∗
Mitchell Rice∗
Gordon Sherman∗

∗Academy Fellow
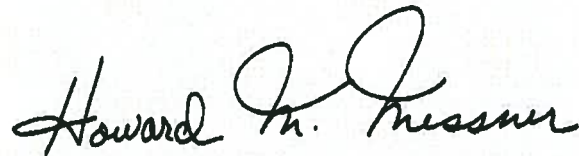

---

* *Academy Fellow*

ii

FOREWORD

Title VII of the Civil Rights Act of 1964, as amended, created the Equal Employment Opportunity Commission (EEOC). EEOC's mission is to enforce federal statutes that prohibit employment discrimination on the basis of race, color, religion, sex, national origin, age, and disability. EEOC currently is piloting a National Call Center (NCC) to respond to nationwide inquiries from a centralized location. NCC management and operations is outsourced to a private vendor.

A 2006 Office of Inspector General report found that NCC provided "timely customer service" for walk-ins and callers, and that the customer satisfaction rate compared favorably to other private and public sector organizations. However, the report also noted operational shortcomings, ineffective procedures and poor communications. It recommended that EEOC continue with the NCC, but only if significant changes were made. Congress and EEOC asked the Academy to assess agency plans for improving NCC and to estimate the costs of replicating NCC operations within EEOC using market data and industry standards.

This report provides the results of the assessment, options and strategies for improving NCC and cost estimates to re-establish a comparable operation within the agency. The Academy was pleased to assist EEOC by conducting this study.

I would like to thank the Fellows who served on this Project Panel for their excellent experience-based participation and keen insights. My appreciation goes to EEOC's executives, employees, and stakeholders for their time and cooperation. I also want to recognize and thank the project team for its efforts in producing this important report.

Howard M. Messner
President

iii

TABLE OF CONTENTS

CHAPTER V: COSTS FOR REPLICATING NCC OPERATIONS WITHIN EEOC....... 41

APPENDICES

FIGURES AND TABLES

ACRONYMS

Academy	National Academy of Public Administration
ACD	Automatic Call Distributor
AFGE	American Federation of Government Employees
CRM	Customer Relationship Management
CSR	Customer Service Representative
CTI	Computer Telephony Integration
EEOC	Equal Employment Opportunity Commission
FPPS	Federal Personnel Payroll System
FTE	Full-Time Equivalent Employees
GAO	Government Accountability Office
IMS	Integrated Mission System
IVR	Interactive Voice Response
NCC	National Contact Center
OIG	Office of Inspector General
OMB	Office of Management and Budget
Pearson	Pearson Government Solutions, Inc.
TTY	Teletypewriter

EXECUTIVE SUMMARY

BACKGROUND

In 2003 the Equal Employment Opportunity Commission (EEOC) requested assistance from the National Academy of Public Administration (Academy) to develop a framework for optimizing its organizational structure and developing a strategic human capital plan. One of three primary recommendations offered in the Academy's report urged EEOC to implement a toll-free National Contact Center (NCC) staffed by trained individuals to take charges (complaints of alleged discrimination) over the phone and respond to questions about EEOC's mission and services. A second study, conducted by EEOC,[1] also recommended the establishment of a call center and the outsourcing of the center's startup. The study recommended that NCC would handle calls and other correspondence about basic inquiries but would not handle the filing of charges.

A two-year pilot of NCC was subsequently implemented in 2004 by Pearson Government Solutions, Inc., with goals of increasing customer service using technology, improving human capital effectiveness, and delivering accurate and consistent services. EEOC's Office of Inspector General (OIG) conducted an evaluation of NCC in 2006 and found that while NCC provided "timely customer service" and the customer satisfaction rate compared favorably to other private and public sector organizations, there were also operational shortcomings, ineffective procedures, and poor communications.

Overall, the report recommended that EEOC continue with the NCC, but only if significant changes were made. Since its inception, NCC has also encountered opposition to a contractor-operated call center from inside the Agency, particularly from the Union (the American Federation of Government Employees), as well as external stakeholders, including members of Congress.

In response to an amendment to a funding bill to prohibit the continued use of funds for the operation of NCC (thereby ensuring NCC would not become permanent), the leadership of the House Science, State, Justice, Commerce, and Related Agencies Appropriations Subcommittee[2] agreed to continue funding for the pilot for one additional year with the caveat that the Academy assess the pilot and share its findings with the Subcommittee and the Agency. In July 2006, the Commission voted to extend the pilot with Pearson Government Solutions through September 2007. The one-year extension contract contains an option for two additional years.

In response to the Congressional action, EEOC and the Academy discussed a two-phase study that uses the OIG recommendations as its starting point. The initial work involves the following:

- Evaluate the EEOC action plan for achieving full implementation of NCC including the planned oversight procedures proposed by EEOC.

---

[1] *Assessment of a National Contact Center Solution for EEOC.* A Report Prepared by the National Contact Center Work Group. EEOC. June 2003.

[2] In January 2007, Congress renamed this the Appropriations Subcommittee on Commerce, Justice, Science, and Related Agencies.

- Estimate the costs of replicating NCC operations within EEOC using market data and industry standards.

KEY FINDINGS

The EEOC is undergoing significant changes to its core business process, much of it driven by the establishment of the NCC, and since the summer of 2006, the Agency has actively pursued initiatives designed to make NCC more successful. The Panel noted that while many of the problems identified in the OIG study could be expected by any agency attempting to put into practice a fundamentally different approach to a key business process, a number of the deficiencies resulted from shortcomings in implementation and follow-up. While the initial planning and implementation efforts were successful in getting NCC started, it is clear that several things could have been done better:

- The Agency could have made a better business case for NCC. The efforts to apprise stakeholders, especially employees, needed more focus and attention.

- The Agency focus on what was actually taking place after NCC got off the ground needed more attention and resources.

- When problems were identified in the early stages, remedial actions were not aggressively pursued.

These issues were compounded by the Agency's inexperience with call center operations as well as a lack of baseline metrics, defined goals and benchmarks for the various initiatives.

The Action Plan

Starting in the summer of 2006, the Agency began to aggressively address the problems that arose from these shortcomings; progress since then has been noteworthy. The Panel's overall assessment of the current action plan is that it will achieve full implementation of NCC, but there are areas that need more attention. The Panel strongly urges EEOC to focus as much attention to anticipating exigent problems as it does in responding to those already identified. With that in mind, the following recommendations are offered for consideration:

Recommendations

- Given the considerable changes that are taking place to the intake process, EEOC should take a more comprehensive look at its core business practices and consider a wide-ranging business process re-engineering review, including increased standardization of processes.

- EEOC should employ a manager with call center experience who can oversee financial and contractual management, service performance management and customer relationship management.

- EEOC should enlist the help of a change management expert, from within or externally, to insure the further development and implementation of its change management efforts.

- EEOC should establish milestones to monitor customer satisfaction using the new uniform intake questionnaire.

- The Agency should pursue the use of interactive electronic intake questionnaires.

- EEOC should share the metrics and analyses used to measure NCC's success with its customers and relevant stakeholders.

- EEOC should closely monitor the implementation of changes to local EEOC office phone listings and all efforts to route more calls to NCC to ensure that these efforts are proceeding as intended.

- EEOC should view the initiative to collect customer satisfaction data as the first step in an ongoing, long-term process to make the Agency better from a customer's perspective.

- More direct contact should take place between EEOC field staff and NCC staff (e.g., having Customer Service Representatives visit field offices to observe the end-to-end process and holding joint training sessions) in order to build better relationships between the organizations.

The Costs of Replicating NCC Operations within EEOC

To determine the costs for replicating NCC operations within EEOC, the study team evaluated the technologies needed to run a call center, staffing needs, and facility requirements. The estimates are broad-based and generic in nature. More precise estimates would require a more formal Request for Proposal (RFP) or similar effort to gather detailed information on specific equipment, technology, etc. The one-time costs for moving NCC in-house are estimated to exceed the current outsourcing costs by $2 million ($2.3 million versus $.3 million[3]). The ongoing annual costs for moving the work back into EEOC is estimated to be $2.8 million more per year than maintaining the existing arrangement. ($5.5 million versus $2.7 million).

The decision to either maintain the current arrangement with Pearson, move the operations in-house, or move NCC to another supplier are all options EEOC may consider. Given the costs involved with any move away from the current arrangement, as well as the fact that many action plan initiatives are still being implemented, the Panel believes that EEOC should maintain the

---

[3] This cost differential results from the fact that EEOC never had a centralized, in-house call center and to open one, it would need to replicate the facilities, workstations, telephony technology, etc., that currently exist at NCC.

current arrangement for the time being until and unless a more detailed, comprehensive cost analysis is conducted of alternative options, which was beyond the scope of this study.

Recommendations

- EEOC should maintain the current outsourced arrangement with Pearson Government Solutions for the time being until and unless a more detailed, comprehensive cost analysis is conducted of alternative options.

- EEOC should benchmark the services it receives from Pearson Government Solutions against industry standards for outsourced call-center-related services to ensure that it is receiving value.

- EEOC should establish and manage an ongoing outsourcing management/governance program, including a set of integrated governance processes designed to provide consistency in working with the service provider and ensure clear alignment of roles and accountabilities.

- The Agency should maintain a backup Interactive Voice Response unit capable of taking calls at the disaster recovery location. The cost for this capability was not estimated as part of this study.

CHAPTER I

INTRODUCTION

THE ACADEMY STUDY

In 2002 and 2003 respectively, the Equal Employment Opportunity Commission (EEOC) initiated a series of studies to find innovative and cost-effective approaches to achieve its mission and provide high levels of service delivery and customer satisfaction in the face of rising rental costs, increased workloads, declining budgets, and reduced staffing. The first study involved assistance from the National Academy of Public Administration (Academy) to develop a framework for optimizing its organizational structure and developing a strategic human capital plan required by the President's Management Agenda[4]. The study identified the 21st century challenges EEOC faced and proposed a set of far ranging alternatives to address organizational issues, relieve facility constraints, respond to increasing workloads, and reduce operating costs through economies of scale. Implementing a toll-free National Contact Center (NCC) staffed by trained individuals to take charges of alleged discrimination over the phone and respond to questions about EEOC's mission and services was one of three primary recommendations offered in the Academy's report.

The second study, a 2003 Assessment Report conducted by EEOC,[5] also recommended the establishment of NCC to process unsolicited public inquiries, assist in completing on-line questionnaires, and respond to frequently asked questions. Implementing NCC called for outsourcing the center startup, monitoring and recording calls for quality assurance, and effective marketing and communication of the center concept to staff, customers and stakeholders to ensure buy-in and support.

A two-year pilot of NCC was subsequently initiated in 2004 under a contract with Pearson Government Solutions, Inc. (Pearson). The objectives of NCC were to increase customer service using technology, improve human capital effectiveness, and deliver accurate and consistent services. In consideration of an upcoming contract option in 2006, the Office of Inspector General (OIG) conducted an evaluation of NCC to provide EEOC management with information to help decide whether to exercise the renewal option. The OIG report found NCC provided "timely customer service" for walk-ins and callers, and that the customer satisfaction rate compared favorably to the satisfaction rate of other private and public sector organizations. However, the report noted operational shortcomings, ineffective procedures, and poor communications. The inefficiencies were attributed to a lack of call volume, poor data capture, and deficient communication processes between NCC and EEOC. Overall, the report recommended that EEOC continue with the NCC, but only if significant changes were made "to improve call volume, optimize customer satisfaction and operational efficiencies, measure on-going performance, and ensure readiness for the future."

---

[4] *Equal Employment Opportunity Commission: Organizing for the Future.* A Report by a Panel of the National Academy of Public Administration, February 2003.
[5] *Assessment of a National Contact Center Solution for EEOC.* A Report Prepared by the National Contact Center Work Group, June 2003.

Concurring with the OIG report that maintaining the status quo was not an option, Representative Stephanie Tubbs Jones introduced an amendment to prohibit the continued use of funds for the operation of NCC. Through follow-up discussions, Representative Frank Wolf, then Chairman, of the House Science, State, Justice, Commerce, and Related Agencies Appropriations Subcommittee,[6] with the concurrence of Representatives Alan Mollohan (Ranking Member), Eleanor Holmes Norton, and Lois Capps, agreed to continue funding for the pilot for one additional year with the caveat that the Academy would assess the pilot. In July 2006, the Commission voted to extend the pilot for one additional year with Pearson through September 2007 with two additional option years possible.

SCOPE

In response to the above agreement, EEOC and the Academy discussed a two-phase study strategy that uses the OIG recommendations as a starting point. The initial work would:

- Evaluate the action plan for fully implementing NCC beyond the pilot, including the planned oversight procedures proposed by EEOC for NCC. This evaluation would include determining the extent of EEOC's use of technology, staffing, training, employee involvement and resources.

- Estimate the costs of replicating NCC operations within EEOC using market data and industry standards. The estimate would be made assuming comparable staffing, processes, technology and equipment, and include the resources EEOC would need to re-establish a comparable operation within the agency.

The result of that initial work is presented in this report. It was anticipated that subsequent follow-on work would address four areas:

- Assess NCC operations to identify whether and to what extent improvements have been made in service delivery and customer satisfaction.

- Assess the impact of NCC on the type and quantity of work by staff at EEOC field offices who had previously been involved in handling telephone inquiries.

- Evaluate the effectiveness of the management and oversight procedures by EEOC for NCC.

- Assess and compare the pros and cons of continuing NCC as a contractor-operated activity with discontinuing NCC and reestablishing these functions within EEOC. Such assessment and comparison should include (and refine and revise if necessary) the cost estimates initially developed as well as the service delivery, management effectiveness and customer satisfaction dimensions referred to above.

---

[6] In January 2007, Congress renamed this the Appropriations Subcommittee on Commerce, Justice, Science, and Related Agencies.

2

Follow-on work would essentially be assessing NCC operations to see whether the service delivery, management effectiveness, and customer satisfaction dimensions have improved with the full implementation of NCC. The Academy recommends this follow-on work be undertaken by EEOC in a timely manner so that the results can be used to inform decisions about NCC contract renewal.

STUDY METHODOLOGY

The Academy study team met with senior EEOC officials and other staff who work on the NCC initiative, representatives from Pearson, union officials, and OIG representatives. EEOC staff provided initial briefings on NCC and supplied the team with documents pertaining to call center operations. Given the short timeframes involved with the study, close cooperation between team members and EEOC staff was essential in securing the needed program information.

There were also a wide variety of source documents made available to the study team to consider including the OIG and EEOC studies, a variety of NCC performance and status reports and various planning documents. Team members also visited EEOC field offices in New York City, Charlotte and Raleigh, North Carolina, Washington D.C., Baltimore and Philadelphia to better understand the field's reaction to NCC's current performance as well as the planned-for enhancements.

ORGANIZATION OF THIS REPORT

Chapter II provides an overview of EEOC and its recent restructuring efforts to include the creation of NCC. Chapter III provides an overview of NCC start-up planning and implementation efforts, including the OIG assessment. Chapter IV evaluates EEOC's current planning efforts and planned enhancements for NCC. Chapter V discusses the costs for moving NCC from a contractor-run organization to an operation managed by EEOC.

CHAPTER II

THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

BACKGROUND

EEOC was established by Title VII of the Civil Rights Act of 1964 and began operating in July 1965. At that time, the agency's primary responsibility was to receive and investigate charges of unlawful employment practices and, for those charges found to be of "reasonable cause," to try to conciliate the disputes. In 1972, the Commission was granted enforcement power. The agency's roles and responsibilities have grown over the years with the enactment of new or amended legislation. Currently, EEOC enforces the following federal statutes:

- Title VII of the Civil Rights Act of 1964, as amended, prohibiting employment discrimination on the basis of race, color, religion, sex, or national origin

- The Age Discrimination in Employment Act of 1967, as amended, prohibiting employment discrimination against individuals 40 years of age and older

- The Equal Pay Act of 1963 prohibiting discrimination on the basis of gender in compensation for substantially similar work under similar conditions

- Title I and Title V of the Americans with Disabilities Act of 1990, prohibiting employment discrimination on the basis of disability in the private sector and in state and local governments

- Section 501 and 505 of the Rehabilitation Act of 1973, as amended, prohibiting employment discrimination against federal employees with disabilities

- The Civil Rights Act of 1991, providing monetary damages in case of intentional discrimination and clarifying provisions regarding disparate impact actions

In carrying out its mission, EEOC interprets employment discrimination laws, monitors the federal sector discrimination program, provides funding and support to state and local Fair Employment Practices Agencies, and sponsors outreach and technical assistance programs. The agency plays an important role in shaping and influencing decisional case law through its litigation and filing of *amicus curiae* (friend of the courts) briefs.

EEOC's *strategic objective* is to promote justice, opportunity and inclusive workplaces by focusing on four shared goals:

- remedying and deterring unlawful employment discrimination

- increasing public confidence in the fair and prompt resolution of employment discrimination disputes

- increasing voluntary compliance with Federal equal employment laws

- increasing individual awareness and understanding of rights and responsibilities.

EEOC's *management objective* is to become the world's preeminent civil rights employment law agency and serve as the standard bearer for excellence in outreach, enforcement and professionalism. This objective focuses on improving organizational capacity and infrastructure through sound management of human, financial and technological resources.

ORGANIZATION

The EEOC has five Commissioners and a General Counsel appointed by the President and confirmed by the Senate. The Commissioners are appointed for five-year staggered terms. The term of the General Counsel is four years. The President designates a Chair and a Vice-Chair when making Commissioner appointments.

The agency has a headquarters and a nationwide field structure. The field organization, which was restructured in 2006, is currently comprised of 15 District Offices, 9 Field Offices, 15 Area Offices and 14 Local Offices. District Directors manage each District Office and supervise the managers of the Field Offices, Area Offices and Local Offices within their respective geographic regions. Offices are designated as "Field", "Area" and "Local" based on size and responsibilities. Each District Office also houses a Regional Attorney and provides the full range of EEOC services to the citizens in the geographic area including private sector intake, charge processing, mediation, enforcement, litigation, outreach, and federal hearings. The Regional Attorney, who reports to the General Counsel, is responsible for overseeing the litigation staff (trial attorneys, paralegals, legal technicians and/or support) and recommending cases for Commission litigation. The district directors supervise the Administrative Judges, who conduct federal sector hearings in the field. Figure 1 shows the current EEOC organization.

Figure 1

EEOC ORGANIZATION
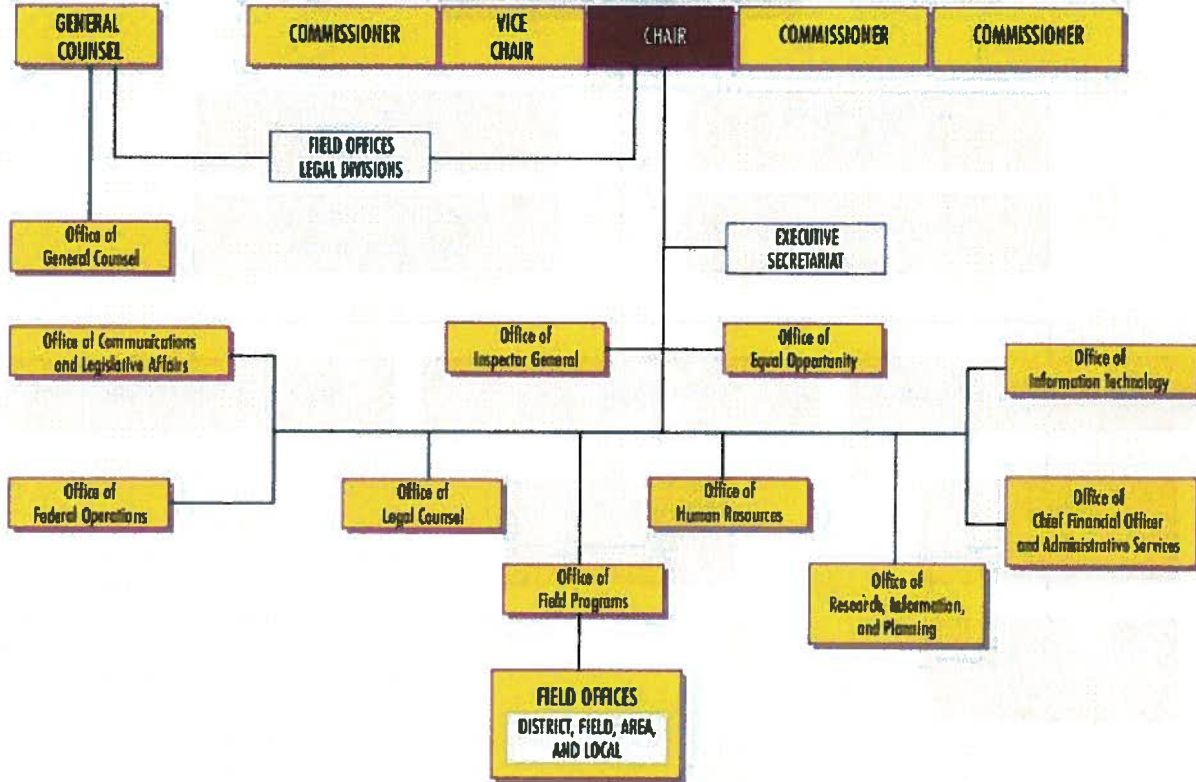
EEOC's Office of Field Programs, in EEOC Headquarters in Washington, D.C., oversees field offices as well as the National Contact Center and is responsible for implementing the Action Plan for improving NCC. Figure 2 shows the current Office of Field Programs organization and Figure 3 lists the field office locations.

Figure 2
EEOC Office of Field Programs Organization Chart

```
                    ┌─────────────────────────┐
                    │ Office of Field Programs │
                    │        DIRECTOR          │
                    └─────────────────────────┘
                                 │
        ┌────────────────────┐       ┌────────────────────┐
        │   Administrative   │- - - -│  National Contact  │
        │       Staff        │       │      Center        │
        └────────────────────┘       └────────────────────┘

        ┌────────────────────┐       ┌────────────────────┐
        │ Special Assistants │- - - -│ National Mediation │
        │                    │       │ Executive Advisor  │
        └────────────────────┘       └────────────────────┘

   ┌──────────────────────┐ ┌──────────────────────┐ ┌──────────────────────┐
   │ Field Management     │ │ Field Coordination   │ │ State and Local      │
   │ Programs             │ │ Programs             │ │ Programs             │
   └──────────────────────┘ └──────────────────────┘ └──────────────────────┘

        ┌──────────────┐            ┌──────────────┐
        │   District   │            │ Revolving Fund│
        │   Offices    │            │   Division   │
        └──────────────┘            └──────────────┘

     ┌──────────────────┐
     │ Field, Area & Local│
     │     Offices       │
     └──────────────────┘
```
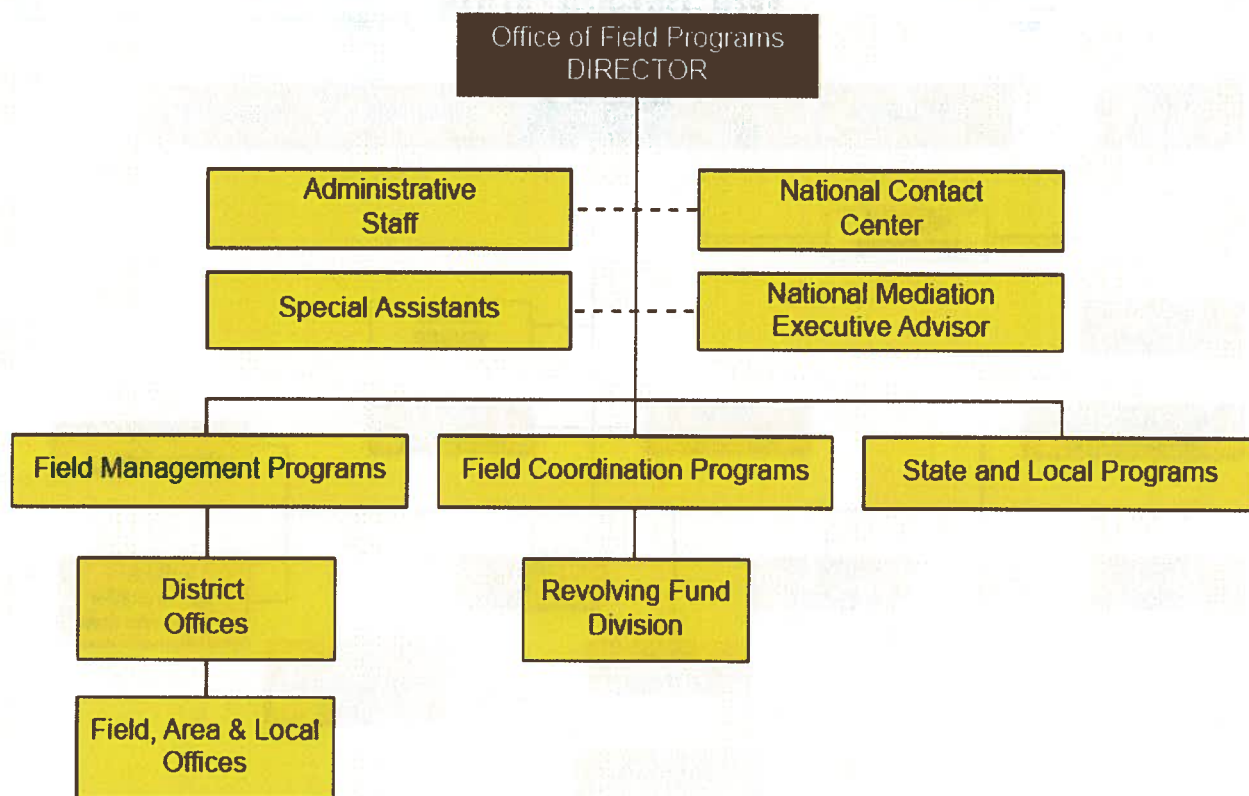
Figure 3
EEOC Field Office Locations

District Offices	Field Offices	Area Offices	Local Offices
Atlanta	Baltimore	Albuquerque	Buffalo
Birmingham	Cleveland	Boston	Fresno
Charlotte	Denver	Cincinnati	Greensboro
Chicago	Detroit	El Paso	Greenville
Dallas	New Orleans	Jackson	Honolulu
Houston	San Antonio	Kansas City	Las Vegas
Indianapolis	Tampa	Little Rock	Mobile
Los Angeles	Seattle	Louisville	Norfolk
Memphis	Washington	Milwaukee	Oakland
Miami		Minneapolis	Richmond
New York		Nashville	San Diego
Philadelphia		Newark	San Jose
Phoenix		Oklahoma	San Juan
San Francisco		Pittsburgh	
St. Louis		Raleigh	

8

EEOC's field locations are the front lines for agency service delivery and perform the core mission functions for the agency. These offices provide intake, charge processing and enforcement services with some having staff who perform mediation, outreach, federal hearings and litigation. All field offices share some role in enforcement and litigation. Because field locations are the point of contact for discrimination complaints, nearly all individuals alleging acts of discrimination by their employers contact, visit, call, or write these field locations to determine their rights, obtain information, initiate a charge, or follow up on a pending action. As noted earlier, these offices were realigned in 2006. Figure 4 shows EEOC's current field office jurisdictions.

Figure 4
EEOC Current Field Office Jurisdictional Map
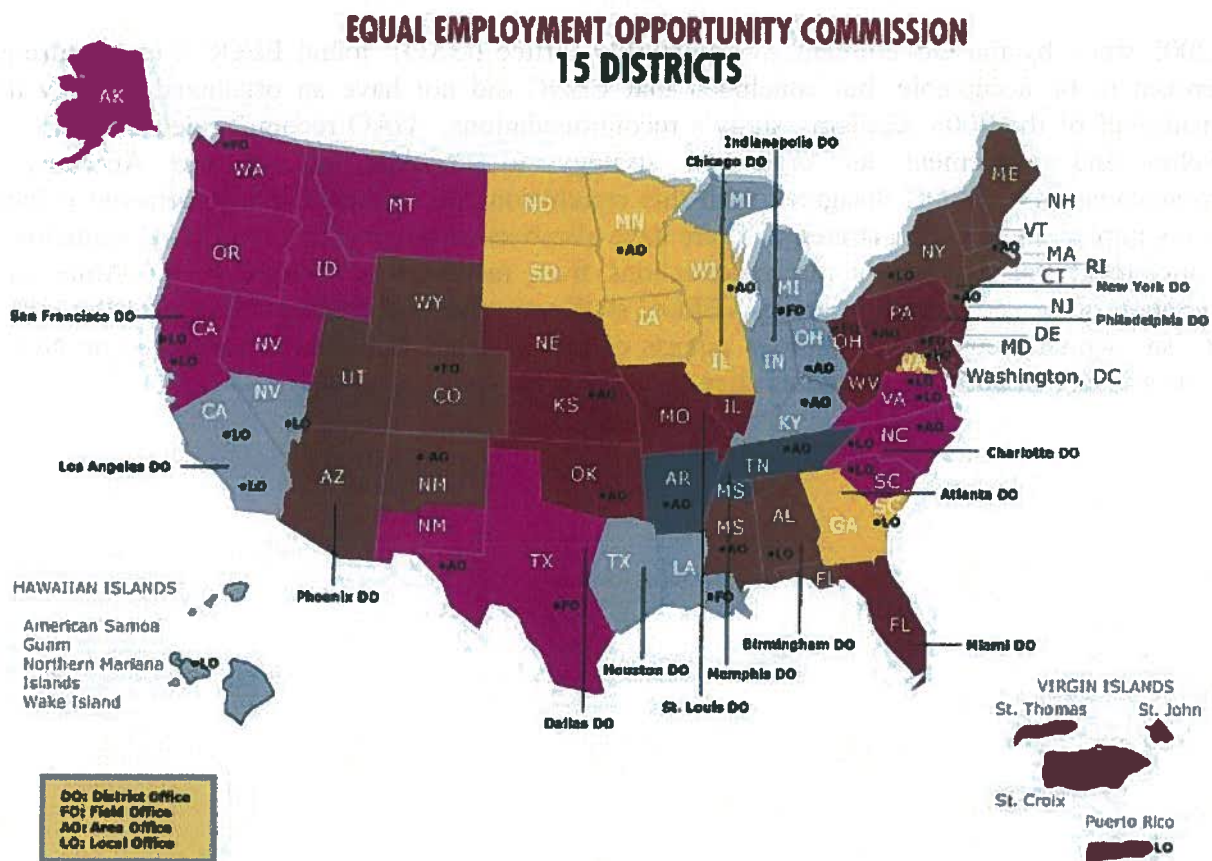
RESTRUCTURING

An important element in EEOC's efforts to improve its organizational capacity and infrastructure was the Academy's 2003 report, *Equal Employment Opportunity Commission: Organizing for the Future*, which provided three major initiatives to guide the repositioning/reorganization of the Agency:

- The first was the establishment of NCC which became operational in 2005.

- The second involved repositioning EEOC's field structure, which was implemented in January 2006. The repositioned structure was designed to expand presence, reduce operating costs, flatten overall management structure, and more logically align offices. It also focused on allowing the agency to redeploy staff to front-line positions, fill additional positions, and ensure that each office has the staff necessary to manage its workload.

- The third involves the restructuring of the Headquarters functions to better support field operations. As of the writing of this report, there has been no restructuring of Headquarters.

A 2005 study by the Government Accountability Office (GAO)[7] found EEOC's restructuring approach to be acceptable, but concluded that EEOC did not have an organized strategy to consider all of the 2003 Academy study's recommendations. GAO recommended that EEOC develop and implement an organized strategy to consider all of the Academy's recommendations. EEOC disagreed with this conclusion and indicated that it believed it had already implemented such a strategy. There have also been strong reactions to EEOC's attempts to implement the Academy's recommendations from members of Congress[8], the American Federation of Government Employees,[9] EEOC staff and other stakeholders. Much of the early criticism, which focused on numerous aspects of restructuring, has now concentrated on NCC and its impacts on both EEOC and its clients.

---

[7] *Equal Employment Opportunity Commission: Actions Taken, but Agency Restructuring Efforts Could Benefit from a More Systematic Consideration of Advisory Panel's Recommendations.* United States Government Accountability Office, October 2005.

[8] Mikulski, Kennedy Express Renewed Concerns over EEOC Restructuring, Impact on Federal Employees in Baltimore. Press Release from Senator Barbara Mikulski, December 12, 2005. Congresswoman Tubbs Jones Urges Reconsideration of EEOC Restructuring Proposal. Press Release, May 17, 2005.

[9] The AFGE National Council of EEOC Locals, which has expressed concerns about EEOC's restructuring efforts on Agency funding and staffing levels, established a website devoted to these concerns: http://www.protectyourjob.org

CHAPTER III

IMPLEMENTING THE NATIONAL CONTACT CENTER

BACKGROUND

The Commission Chair moved forward on the Academy's 2003 recommendation to implement a toll-free NCC staffed by trained individuals to take charges[10] over the phone and respond to questions about EEOC's mission and services. An early step was commissioning an internal work group of field and headquarters staff to explore the costs and benefits of establishing such a center.

The work group estimated that EEOC received over one million unsolicited calls annually from the public and that of those calls, approximately 61 percent were general inquiries and 39 percent involved filing a charge of employment discrimination. Service delivery performance was found to be highly inefficient and hampered by inadequate telecommunications infrastructure and uneven staffing which led to numerous complaints of unanswered calls or long delays in service response. The work group concluded that EEOC could not effectively handle the volume of calls with its current infrastructure and technology and that a contact center was the most cost effective way to significantly improve service capacity and effectiveness. The work group recommended that the contact center not handle actual charge filing. Rather, a contact center would free up EEOC staff to focus on mission critical activities such as charge intake and investigation, counseling of potential charging parties, and outreach to employers and employees. In November 2003, the four sitting EEOC Commissioners voted unanimously to approve the report and recommendations of the work group.

The Agency issued a Request for Proposal (RFP) for a National Contact Center in March, 2004. In August 2004, the Source Selection Authority identified a recommended vendor (Pearson Government Solutions) for selection and forwarded a contract approval package to the Commission. The Commissioners approved a two-year pilot program to allow collection of data on both performance and costs to serve as a basis for future competitive sourcing comparisons and decisions

ISSUES

A number of concerns and issues were raised by internal and external stakeholders regarding the appropriateness of a national contact center to handle EEOC inquiries:

---

[10] Having the contact center take charges over the phone was part of the original Academy recommendation but the approved pilot program did not include this element.

Union Protests Contracting Out

The American Federation of Government Employees (AFGE) filed a bid protest with the Government Accountability Office challenging the Commission's decision to seek proposals for a contact center because the Commission had allegedly not complied with the Office of Management and Budget (OMB) Circular A-76.[11] Among other things, AFGE argued that the agency should have conducted a public/private price competition before deciding to contract work out unless a waiver was secured from OMB. The protest was dismissed because federal unions do not have standing to file bid protests with GAO since they are not "interested parties" within the meaning of GAO's bid protest jurisdiction.

EEOC also maintained that a waiver from OMB was not necessary because the Circular does not require a public/private price competition if the services involved constitute new work or a segregable expansion of existing work. Since the proposed procurement created a centralized, dedicated contact center with many capacities not possessed by EEOC (extended hours, multi-lingual capacity nationwide, and tracking and logging of data to identify workplace trends) the Agency argued that the services constituted either new work or a segregable expansion of existing work.

Costs

Concerns about shortfalls in EEOC's budget led many to question the feasibility of contracting out a call center versus using the Agency's in-house capabilities to perform the same work. The EEOC work group estimated the costs of an outsourced center to be between $2 million to $3 million annually, after initial start-up, and that an in-house contact center could cost $12 million for infrastructure alone (technology, equipment, and telecommunications).[12] Costs of staffing, space rental, and maintenance would be additional.

Displacing EEOC Employees

The potential for a call center to displace EEOC employees was a concern expressed by a number of parties. In response, the Agency stated that NCC would not displace any EEOC employees and would, instead, relieve them of collateral phone duties and allow them to devote more time to core job functions such as investigation, mediation, litigation, management and staff support.

Call Center Capabilities

Questions were also raised about the ability of contact center employees to answer EEOC inquiries. In response, the Agency noted that since 61 percent of calls are basic in nature

---

[11] *OMB Circular A-76. Performance of Commercial Activities.* This Circular establishes Federal policy regarding the performance of commercial activities and implements the statutory requirements of the Federal Activities Inventory Reform (FAIR) Act of 1998, and sets forth the procedures for determining whether commercial activities should be performed under contract with commercial sources or in-house using Government facilities and personnel.

[12] The work group's start-up estimate is significantly higher than the estimates provided in Chapter 5 of this report. Some of the difference results from assumptions about purchasing versus leasing certain functions or capabilities, e.g., Customer Relationship Management software.

(general information, case status, file disclosure, customer service complaints, other employment issues, etc.) the call center staff would be able to answer the most frequently asked questions posed to EEOC. Call center employees would collect information from potential charge filers and forward the information to EEOC offices for assessment and follow-up and complex inquiries would be referred to appropriate EEOC staff for a response.

EEOC also agreed to a number of steps to improve quality assurance including:

- developing a web-based inquiry assessment tool and a searchable knowledge base to assist callers;

- training customer service representatives on hard (programmatic) and soft (professionalism) skills before taking calls;

- monitoring calls in real-time for accuracy and courtesy; and,

- measuring the performance of customer service representatives in terms of accuracy of data captured and accuracy of responses given.

The Agency also stated that the contact center would operate under business rules that emphasize customer satisfaction and quality assurance and that EEOC staff would be solicited for input regarding the operation of the center during the pilot period.

Inherently Governmental Duties

Concerns were also raised as to whether the call center staff would be performing inherently governmental functions. The Agency stated that these employees would not counsel or screen out potential charge filers regarding whether or not they have a charge of discrimination nor would they be expected to answer questions relating to complex issues of employment discrimination law. They would be trained to recognize more complex factual inquiries and refer those seeking an interpretation of the law or a set of facts to field offices. Their primary responsibilities would include:

- describing the laws EEOC enforces;

- being a clearinghouse for information on employee rights and employer responsibilities;

- providing information on how the investigative process and mediation work;

- giving the location and telephone numbers of field offices and the hours of operation;

- providing case status information and file disclosure information;

- providing referral information for other agencies; and

- providing responses to requests for training and education.

13

Most calls to EEOC cover the above subjects. If a caller wished to discuss a potential charge of discrimination, call center employees were to collect and record the pertinent information using a web-based inquiry assessment tool, and forward the information to the appropriate EEOC office for follow-up.

PLANNING FOR THE NATIONAL CONTACT CENTER

In their assessment[13] of the feasibility of a call center, EEOC staff projected it could achieve a number of positive outcomes including:

- increased efficiency and courtesy in public interactions,

- increased public satisfaction with interactions,

- use of state-of-the-art technology to streamline and professionalize agency interactions,

- better performance management,

- improved human capital management,

- improved quality assurance monitoring, and

- improved ability to forecast resource needs.

It was also seen as a way to develop:

- speedy and consistent assessments of customer needs,

- speedy and consistent delivery of appropriate information to customers by trained staff,

- improved quality assurance and accountability with respect to service,

- data on the nature of contacts to facilitate the identification of trends and emerging issues,

- language capacity to meet the needs of the agency's customer base,

- more efficient customer service and increased customer satisfaction, and

- appropriate deployment and use of staff resources.

EEOC elected to open the call center as a two-year pilot program during which center agents would address most public inquiries including inquiries from callers seeking to file a charge.

---

[13] *Assessment of a National Contact Center Solution for EEOC.* A Report Prepared by the National Contact Center Work Group, June 2003.

Callers seeking to file a charge were to be referred to the EEOC web site for self-service or would be assisted by having an EEOC-developed electronic assessment tool and questionnaire administered over the telephone. If the caller passed the assessment tool, the contact center agent would complete an on-line questionnaire for the caller and submit it to the appropriate office for decisions on actual charge filing and processing. Other inquiries could be answered by contact center staff that have been intensively trained and supplied with scripts to respond to anticipated questions.

It was also decided that the call center would consist of a vendor-provided facility, technology, and staffing. The technology provided would include a single toll-free number and an Interactive Voice Response (IVR) system. Inquiries coming into the center would be categorized into three tiers. Tier one inquiries would include frequently asked questions on EEOC laws, procedures, locations, hours of work, etc. Tier two inquiries would include those from persons seeking to file a charge. Tier three inquiries would comprise those of a complex or novel nature. Many basic inquiries and frequently asked questions would be handled by the IVR system. Contact center staff would handle all inquiries categorized as tier one not covered by the IVR and all tier two inquiries. Tier three inquiries would be transferred to EEOC staff for resolution. E-mail and facsimiles would be responded to within 24 hours

Using a call center vendor was seen as an opportunity for EEOC to benefit from the contractor's ability to use economies of scale, retain a customer focus, and leverage its knowledge of appropriate technology such as automatic call distribution and computer-telephone integration. EEOC was to own all data and records generated and it would benefit from the vendor's investment in state-of-the-art contact center technology. In addition, EEOC would have the ability to expand contact center services in the future to include electronic mail, postal mail, and facsimile services, as the demand grew.

The services handled by the EEOC call center during the pilot phase would cover the spectrum of basic inquiries, frequently asked questions, information on laws and procedures, the equal employment opportunity report series, office hours, locations, staff directories, and case information, with caller authentication. The call center would respond to inquiries from potential charging parties and assist in the completion of on-line charge questionnaires, if appropriate. Other services to be phased into contact center operations included handling e-mail, facsimile, postal mail, and fulfillment of requests for publications and printed materials. The EEOC national contact center would not handle actual charge filing.

The Agency recognized that it needed to develop internal and external marketing strategies to communicate the business case for a national contact center to its staff, its customers and its stakeholders in order to solidify support for the initiative.

A Call Center was also seen as a way to lower customer service costs through:

- the consolidation of the 51 dispersed call centers located in EEOC field offices;

- staff modeling, specifically the ability to accurately forecast staffing needs based on call volume and service needs;

- performance management, specifically the ability to determine the appropriate measurements of service quality, gather and utilize the trend data for continuous improvement;

- technology applications - using state of the art technology—web, automated attendant, IVR, etc., to automate routine inquiries and reduce staffing needs;

- process re-engineering, specifically the business model for handling customer calls could be streamlined to produce quicker response times, less misinformation and higher customer satisfaction;

- training targeted to development of soft and hard skills necessary for successful job performance; and

- outsourcing, specifically opportunity to partner with contact center specialists who are able to realize economies of scale, and use knowledge of industry best practices to improve quality, meet service demands, and be able to initiate operations quickly without the usual start-up costs.

In addition to costs per call, on-going costs of a national contact center would include the costs of knowledge management, such as updating frequently asked questions, technical scripts, and keyword prompts. Actual costs of a national contact center depended on the desired service and performance levels.

While there was support among agency staff for the implementation of an e-filing or electronic charge filing initiative, many concerns were expressed about the appropriateness of contact center staff handling public inquiries and charge intake. Many EEOC employees in the field and headquarters asserted that proper charge-taking requires staff trained and experienced in the investigation of EEOC charges.

EEOC also wanted a call center to provide for disaster recovery, statistical reporting capabilities, and the ability to interface with several of the agency's information technology systems. Allowances for future growth, expansion and technological improvements were to be built into the design of the center and initial technological requirements would include: Private Branch Exchange, Automatic Call Distribution, Interactive Voice Response with speech recognition, call accounting systems and agent recording/monitoring equipment. Also, staff at the call center would require access to several of EEOC's information technology systems in order to accurately and appropriately respond to customer inquiries.

OUTREACH

On February 2, 2005, EEOC published an outreach plan[14] for NCC, which was in the final preparation stages for its scheduled opening. The opening was to take place in two stages with 25 percent of projected calls going to the call center on February 21 and the remainder going on March 21. As noted in its outreach plan, the Agency recognized the importance of good communications to the success of the call center:

> *As with any agency-wide new initiative, NCC has been met with mixed reviews. Although the Commission held hearings to determine if NCC should be implemented, and the procurement process was very detailed and thorough, misconceptions remain about the purpose, benefits, impacts and expectations of the National Contact Center. In addition, very limited promotion and marketing of NCC has occurred to the general public and partner organizations that will refer the public to NCC for assistance. As a result, the launch of the National Contact Center requires a coordinated Outreach Plan to disseminate information about NCC and instill NCC toll-free numbers as a key resource for contacting EEOC.*

The goals for the outreach plan were straightforward:

- Raise awareness of NCC among the general public

- Provide information to EEOC employees about NCC's purpose and services

- Provide information about NCC to organizations that work with employees and employers

The plan called for an aggressive approach with a focus on a number of key areas:

- Identifying the phases of acceptance that stakeholders were expected to go through during the deployment of NCC

- Identifying key stakeholder groups and specific approaches to each

- Conducting an EEOC employee assessment to obtain feedback regarding their understanding and perceptions of NCC. This initial assessment was designed to establish a baseline measurement of employees' awareness and readiness

- Establishing methods of outreach including an internal NCC website, individual meetings, fact sheets & posters, news coverage, trade articles, "Town Meeting", presentations, direct mail, and an NCC Video

---

[14] *U.S. Equal Employment Opportunity Commission National Contact Center Outreach Plan.* Version 2.0, February 2, 2005.

- Establishing timeframes

- Creating feedback mechanisms

- Post-deployment stakeholder assessment

- Communicating NCC performance results

OIG STUDY FINDINGS

The OIG study found that NCC had become EEOC's central point of contact and that unsolicited calls to EEOC's two general information toll free numbers, originally routed to field offices, were now being answered at NCC. This study also found that the Contractor had met most of the contractual performance measures with the exception of the "Service Level—Average Speed of Answer."

A major finding was that NCC was receiving only a fraction of the call volume projected in the 2003 Assessment Report (269,693 versus 1.2 million estimated) in part due to the business decision to limit initial calls to NCC during the pilot phase of operations. As a result of this reduced call volume, the OIG study calculated that the actual savings in field office staff hours was 6.71 full time equivalent employees (FTE) as opposed to the Assessment Report's projection that NCC would save 21 FTE. In a written response to a draft of the OIG study, the Office of Field Programs disputed the call volume estimates and noted that there were 402,383 contacts during the study period including IVR, telephone, fax, email, and written correspondence.

The OIG study found that while field employees had experienced some reduction in call volume they expected NCC would reduce workload far more than it actually did. Some offices experienced savings in investigator and/or support staff time because of NCC, but many investigators commented that the forms they received from NCC often contained inaccuracies and incomplete information. Some investigators used only a portion of the information provided, causing duplication and in some cases, more work.

The study also found that communications between NCC and EEOC offices were problematic, with employees at NCC not fully understanding their role or the work of EEOC. The channels to communicate feedback and share knowledge and information between NCC and EEOC were limited and there was very little integration of technologies between the organizations which increased errors and reduced the efficiency of the referral process.

While the study found that customer satisfaction rates for NCC were above average when compared to other Federal agencies and service industries in the private sector, it concluded that customer service representatives needed more training in how to handle calls on a consistent basis as well as training in soft skills on how representatives handle transactions.

The OIG study concluded that the while NCC had the potential to make significant contributions to EEOC, at the time of the study, NCC had not achieved its full potential and effectiveness. The

OIG study recommended that EEOC continue with NCC, but only if significant changes were made to improve its operations. Another option proposed that EEOC abandon NCC and use the money saved to upgrade telephone technology in field offices and hire more staff.

CHAPTER IV

EVALUATION OF CURRENT PLANNING EFFORTS

The Academy reviewed the EEOC action plan principally from two perspectives:

- The first perspective pertains to the congruence of the items addressed in the plan with the items addressed in the OIG report. This part of the review gives attention to:

  o The stated or inferred importance of the topics included in the EEOC action plan compared to the implied level of importance indicated in the OIG report.

  o Items that the Academy staff identified during their interviews and research that were not included in the OIG report and/or the action plan.

  o The likelihood that the items in the action plan, if executed, would have the desired outcome or effect.

It is difficult to establish the exact congruence of the items in the OIG report and the items in the EEOC action plan for two reasons. First, the action plan and subsequent documents are under continuing revision given the ongoing change initiatives being undertaken as this report is being written. Second, both the broad topical areas and the sub-elements of each area of the OIG report are in a different framework than the corresponding areas of the action plan. The focus of the Panel's analysis is the EEOC action plan, with reference back to the OIG recommendations, where appropriate.

- The second perspective pertains to the characteristics of the plan compared to characteristics typically found in action plans and other operationally-oriented planning documents. This analysis gave attention to:

  o The clarity and comprehensiveness of the description of the action plan items.

  o Statements concerning the reason for the action plan item.

  o The inclusion of operational details such as time frames, milestones, end points, etc. that will facilitate the management of the action plan.

  o Inclusion of assessment mechanisms for determining whether items have produced the desired effects.

The analysis also gave special attention to six specific areas identified by EEOC as being particularly important to the improvement of NCC's performance:

21

- Planned oversight procedures proposed by EEOC

- The effective use of technology

- Staffing levels and competencies

- Staff training and development

- Employee involvement

- Resources needed to support the function

The OIG report contained 10 recommendations. The EEOC plan includes nine areas of action, each of which will be discussed with respect to the two perspectives described above. This is followed by a discussion of the areas of special focus identified by EEOC.

OIG RECOMMENDATIONS

1. Increase call volume by increasing customer awareness and routing all initial calls through NCC.

2. Increase the number of calls that are resolved at NCC and not forwarded to EEOC offices by clearly defining NCC's role.

3. Improve the number of non-charge related calls resolved at NCC by integrating processes and technology across EEOC and NCC.

4. Institute significant changes to the operating model (by standardizing) the citizen contact process across EEOC and NCC (and by establishing) an "EEOC/NCC Steering Committee" with representation from all stakeholders.

5. Provide training and feedback to CSRs on technical and soft skills, and improve the quality of information sent to EEOC offices.

6. Standardize and automate NCC processes so it is ready to handle increased call volume, reducing errors and ensuring that all CSRs follow the same processes.

7. Create and implement reporting processes to identify trends proactively.

8. Create and implement a process to regularly monitor and measure customer satisfaction.

9. Establish metrics to measure NCC's future impact on EEOC operations, staff, and customers.

10. Implement change management procedures by articulating the vision for NCC, the business proposition and urgency of implementation, as well as removing obstacles.

ACTION PLAN INITIATIVES

At the July 13, 2006, meeting of the Commission, EEOC's Office of Field Programs, with the involvement and support of other EEOC offices, was directed to implement nine initiatives collectively known as the action plan. In summary, these initiatives were to:

1. Increase call volume by enhancing customer awareness through advertising, changes to information directories, and outreach.

2. Route all initial calls made to EEOC by the public to NCC.

3. Integrate EEOC and NCC processes and technology so that individuals in both organizations have access to relevant information and there is less chance of redundancy.

4. Create a uniform intake questionnaire to assure that the same charging party information is being captured at all EEOC facilities.

5. Establish reporting processes to provide operational data on NCC performance, including complaints, and to identify workload trends.

6. Measure and monitor customer satisfaction.

7. Execute change management procedures to ensure smooth integration of NCC and EEOC operations.

8. Assess the costs and benefits of NCC and assess alternative approaches including the establishment of an "in-house" call center operation.

9. Establish a steering committee to monitor NCC performance and facilitate integration of NCC operations with EEOC operations.

The nine items presented in early documents obtained from EEOC are brief and to the point. Subsequent documents provided by EEOC staff contain additional details including sub-elements, due dates, responsible official and status. Each of the nine action plan items are discussed below.

1. Increase Call Volume by Enhancing Customer Awareness

This initiative is predicated on the fact that the OIG study found that the incoming call volume at NCC (270,000 in the first year of the pilot) was far less than an estimate of the total number of calls received annually by the Agency (1.2 million). The predicted number of calls was important to the decision to establish NCC since it formed the basis for estimating the staff time that would be freed up to perform activities requiring higher-level skills, training and experience.

The estimate of calls expected, call duration, and other factors were also critical components in negotiating a contract with a service supplier. These estimates impacted the number of eligible bidders as well as the determination of cost.

There were two primary reasons for the difference between the estimate and actual numbers of calls received during the pilot year. First, the estimate was based on a limited, one-time survey conducted by EEOC (there were no Agency wide systems that captured field office call volume information) and the reliability of the data reported could not be confirmed. Second, by design, not all incoming calls to EEOC field offices were being redirected to NCC during the pilot phase. Estimating the number of calls that NCC was likely to receive was also complicated by the fact that there was no way to estimate the number of callers who, prior to the creation of NCC, abandoned their efforts to contact EEOC because they were unable to get through to local offices. The OIG Study concluded that increasing public awareness of NCC would likely increase call volume and that EEOC should undertake an outreach campaign to accomplish this.

Assuring that private and public sector employees are aware of EEOC and what it does, and know how to make contact in times of need, are long held goals of the Commission. Consequently, EEOC's action plan includes enhancements and expansions of techniques that were used or considered in the past. The following were included in its outreach enhancement initiatives:

- *Supply an outreach plan to field program analysts.* Field program analysts received an outreach plan, along with supplies of magnets and palm cards (in both English and Spanish) for distribution during outreach activities, and five PowerPoint slides, with animation and sound, to be used alone or integrated into presentations on other topics. The materials included both the 800 voice and TTY (hearing impaired) telephone numbers.

- *Monitor Google hits.* EEOC launched a Google public service campaign and is monitoring the resulting hits on EEOC's web page.

- *Make Web Site changes.* Revisions were made to EEOC's web site to increase the prominence and access to both the 800 number voice and TTY numbers.

- *Distribute Public Service Announcements.* Public service announcements were distributed to English and Spanish radio stations nationwide. English scripts were also sent with a cover note underscoring the fact that translations for 151 languages are available for NCC clients.

- *Complete a color brochure on the 800 number service.* Printing problems have delayed the completion of this effort. EEOC is awaiting a new delivery date from the Government Printing Office (GPO).

- *Change the Blue Pages (government listings in commercial phone books) listings to show the NCC 800 number.* In addition to providing the NCC 800 number for Blue Pages listings, EEOC is also considering providing an additional 800 number which

callers can use to contact local offices directly. (See the "Shadow 800 number" discussion below).

EEOC's efforts in increasing public awareness of NCC track very closely with the recommendations from the OIG study. What is not clear is how the Agency will measure the effectiveness of these efforts. The Plan's focus on the initiation of the above activities should be supplemented by efforts to determine how successful they are, i.e., checking with stakeholder organizations to see if the outreach efforts have reached their members or clients.

The idea of placing two 800 numbers in the Blue Pages listings (one for the NCC and one to reach local offices) could be confusing to callers and result in a number of initial calls not being routed to the NCC. The Panel believes the Agency should reconsider this idea.

The Panel also believes EEOC should closely monitor the implementation of the changes to local EEOC office phone listings to ensure that this effort is proceeding as intended. Specifically, it would help to have Agency employees, under the direction of headquarters staff, call directory assistance to see how callers to EEOC are actually directed through this inquiry process. This 'reality check' should be performed until EEOC is satisfied that this new process has been thoroughly incorporated into the Agency. Calls made to local EEOC offices by study team members to test the new changes resulted in a number of inconsistent outcomes.

Other than the issue of closer follow-up on outreach and the changes to local office phone listings, the Panel did not identify any significant insufficiency in what the Agency has done or plans on doing in this area.

2. Route Initial Calls to NCC

This action plan item is related to the same section of the OIG report that precipitated the previous item. As noted previously the OIG report contains conclusions relating to low call volumes. Since the initial configuration did not divert all incoming calls to NCC the OIG recommended:

> *...to increase the volume, the team recommends that EEOC route all unsolicited calls to [the] NCC. This would involve making local numbers available only to people who have existing relationships with EEOC offices... This would ensure that callers have a similar customer experience, since services provided by NCC are regularly monitored for quality service.*

The action plan addressed two central issues for increasing NCC call volume: redirecting calls from local offices to NCC and then providing NCC with the ability to direct callers who have existing relationships with local offices to the appropriate local office number:

- *Place an unmonitored greeting on each Blue Page number.* Callers to EEOC field offices' Blue Page numbers are directed to call NCC's 800 number for further assistance. Field offices were transitioned to this system in a staggered schedule from November thorough December, 2006.

25

- *Provide a 'shadow 800 number' to callers.* If NCC is unable to resolve the issue and the caller needs to speak to someone in a local office, NCC Customer Service Representatives will provide a 'shadow 800 number' which allows the caller to call directly into a local EEOC office.

As with the previous action plan item, this element directly addresses the recommendations made in the OIG report. These new processes also need to be tested (reality checked) to ensure that they are working as intended.

The Panel believes it is essential to measure the impacts of these changes on NCC and field office call volumes. Measuring the impact on NCC is easier because of the Center's ability to capture highly detailed information on their work, both incoming and outgoing. This is much more difficult at the field office level both because the call data systems are not as robust and also because the business practices vary from office to office. The Agency conducted a call volume survey of the field in October 2006 (prior to the implementation of the above initiatives) and plans a follow-up survey in April 2007. As of the writing of this report, no results of the October survey have been published so the usefulness of the data in estimating field office call volumes could not be determined.

3. Integrate Processes and Technology

At its core, a call center is comprised of a set of resources—typically personnel, computers, and telecommunication equipment—which enables the delivery of services via the telephone[15]. The capacity of contemporary telecommunication equipment and computers make call centers possible. Among other contributions, they can identify the location of the caller and use that data to route the call; they support skill-based routing that permits callers to connect with customer service representative with the correct information; they advise customers of the expected waiting time; and they make it possible to record and support all of the data needed to balance service, customer relationship, staffing and operating costs.

In addition to the challenges of getting and using the right telecommunication equipment and computer based systems, the employee-technology interface provides many challenges and potential glitches. Given its obvious importance, it is not surprising that the compatibility of NCC and EEOC processes and technology was identified in two of the OIG recommendations:

> *Improve the resolution of non-charge related issues by integrating processes and technology across EEOC and NCC*

> *NCC should standardize and automate internal processes to achieve better efficiency, consistency, and quality of service. Part of this involves better use of available technologies.*

---

[15] Gans, Noah; Koole, Ger; Mandelbaum, Avishai; *Telephone call centers: Tutorial, Review, and Research Prospects*, Manufacturing and Service Operations Management Vol. 5, no. 2, spring 2003.

The establishment of NCC created a need for a single uniform call intake process. This required EEOC to deal with a wide variety of systems and processes that existed in different intake units of the organization. Prior to the establishment of NCC, the existence of different intake processes provided different levels and quality of service to the public, and made it difficult to collect and analyze uniformly defined Agency-wide statistics.

Prior to NCC, calls were received at individual field offices with intake systems compatible with the established procedures of each office. Using a common point of intake (through NCC), with a single computer-based intake process, required the establishment of a new set of interfaces.

As the OIG noted in its report:

> *From a field operations perspective, the two organizations are operating in parallel and nearly autonomously from one another. NCC and EEOC should use the same or integrated technologies to capture and maintain customer information.*

In most instances bridging the differences between computer-based systems is not a casual undertaking since this frequently involves substantial time and resources. The focus of this action plan element is the elimination of duplicate data entry required when NCC customer service representatives transmit time sensitive e-mail messages to field offices.

The information is entered in NCC's *RightNow Technologies* (RightNow) data system and e-mailed to EEOC field offices which then re-enter it into EEOC's Integrated Mission System (IMS), the internal data warehouse where complaints and mediation issues are tracked. This not only is a duplication of effort, it also sometimes appears to EEOC field staff members that handle these inquiries that calling NCC first is an unnecessary step added to the client inquiry process. The action plan focuses on a single initiative to address the two OIG recommendations concerning system compatibility:

- *Integrate EEOC and NCC processes and technology.* As of the writing of this report, EEOC and Pearson have agreed on an approach, and Pearson is developing the software to integrate entries made in *RightNow* into the IMS system. This will eliminate the need for EEOC field staff to re-enter the information sent by NCC.

Until this initiative is implemented, it cannot be conclusively determined if it would substantially improve the data integration issue, but it does appear to be headed in the right direction. Technical requirements were preliminarily agreed to by EEOC and Pearson in mid-January 2007, with a final discussion scheduled for the end of the month. Given the importance of this effort to both the performance and the perception of NCC and of the performance of field offices, the Panel believes it is essential that EEOC focus on ensuring that the project is completed successfully and timely.

4. Uniform Intake Questionnaires

The OIG report recommended the establishment of a standardized contact process with the option of having NCC mail questionnaires to clients as one of a variety of specific items:

> *The EEOC should standardize the citizen contact process into one seamless process across EEOC and NCC.... The...Team understands that the idea of standard intake processes across EEOC offices runs counter to the current philosophy of allowing offices discretion in how they conduct their initial client contact and intake procedures.... One option advanced by survey respondents and managers during team interviews was to have NCC issue intake questionnaires. This would eliminate some of the clerical work currently performed at the offices and enable managers to redirect resources to other mission critical activities.*

EEOC's action plan adopted the recommendation regarding the questionnaire:

- *Create a uniform intake questionnaire and have NCC mail them to clients.* The questionnaire was developed by an EEOC work group and approved by the Agency for nationwide use. NCC began mailing them to clients for completion (in lieu of taking the information over the phone) in December 2006.

EEOC's decision to start with a uniform intake questionnaire seems intuitively correct since the questionnaire serves as the starting point for the determination of the strength of a charge and provides information necessary for the subsequent development of a charge. The other key aspect of the action plan element is having NCC mail the questionnaires to callers in lieu of trying to take the information over the phone. This has the dual benefit of not only reducing the errors made by CSRs in gathering this information for forwarding to local offices but also significantly reduces the handling time for each call to NCC, a significant factor in the Center's inability to meet a key performance metric for the latter half of 2006.

The Agency has created mechanisms for tracking the number of questionnaires mailed out by NCC, the number received in field offices and the number that eventually become charges. Headquarters also plans to review a sample of questionnaires submitted to field offices by clients to assess how the new form is working. The Panel believes this review is essential because of the possibility that not all recipients of the questionnaire will be able to complete it on their own; some may complete it partially and return it, and some may find that completing the form is too daunting and drop out of the system because of its length. Since this is a critical step in the intake process, the Agency's steps to track and adjust to the use of this new form and process are critical.

There is an important additional consideration in this particular action plan element: developing an on-line version of the questionnaire. While paper forms may be the medium of choice for many EEOC clients, there are significant service and performance improvements that can result from making the questionnaire available on-line. Interactive electronic forms can make the questionnaire completion process easier for clients and provide more accurate and useful

information to EEOC. The information can also be used to populate EEOC's IMS database, eliminating the need for field office staff to reenter the information.

Agency staff noted that prior discussions about the use of an electronic questionnaire generated concerns about legal and technological barriers as well as fears that electronic forms could be misused by some parties. The fact that Federal agencies with some of the largest number of client interactions (Internal Revenue Service, Social Security Administration) routinely allow their clients to use on-line forms demonstrates the utility of this approach. The technology already developed for the EEOC Assessment System (EAS) can provide a platform for such an effort. EEOC could regulate the use of its form, for example, by restricting access to people who have been provided with a one-time-use access code by NCC or EEOC local office staff.

While the use of this technology has significant potential for the Agency to improve its performance and service to clients, the Panel believes it should not be approached as a "stand alone" effort. Given the considerable changes to the intake process resulting from the start up of NCC, the opportunity to look at additional changes in the overall business processes should not be ignored. The Panel believes EEOC should review its complete business processes in a comprehensive and in-depth manner.

5. Operational Data

The OIG report and the EEOC action plan address issues of operational data but with different emphases. EEOC's initial data collection efforts have largely been focused on identifying and resolving start-up problems, while the OIG emphasis is on the collection of data to support the identification of trends. The OIG report states:

> *There are presently no reliable baseline operational metrics to evaluate NCC's impact on EEOC's efficiency and effectiveness. It is essential to develop baseline metrics in order to evaluate NCC's future impacts. The team recognizes metrics specific to measuring NCC's impact may have broad application across EEOC...*

EEOC's action plan includes elements to address both problem identification and resolution as well as trend identification:

- *Establish forum for surfacing complaints.* Among other activities, EEOC headquarters holds conference calls every second Thursday with field station intake supervisors to address intake and other NCC matters. A specific staff member has been designated to receive, monitor and resolve NCC complaints of all sorts.

- *Determine trend data elements.* The initial trends to be identified will consider differences across EEOC jurisdictions in the following areas: private sector and federal sector calls; English and Spanish calls; reasons for calls; bases/issues for the complaints; demographics by bases/issues; and emerging issues.

29

- *Develop software to create trend reports.* Pearson is determining the changes that must be made in the *RightNow* system to capture the desired data to show service delivery and service trends.

The "complaints forum" is an important step both in improving NCC operational problems and facilitates field office buy-in. Conversations with forum participants indicate that this is seen as a positive step that helps each party—NCC and field offices—better understand each other's operation. It would also be helpful to track and publish the "complaints" resolution both to keep staff apprised on how problems are being addressed as well as to publicize the (hoped for) reduction in the number and seriousness of the complaints.

The trend data can have significant impact on the Agency's ability to monitor and track both the operational process and the quality of client services. As the OIG report noted:

> *With proper setup, reports from NCC could serve as an important avenue for the EEOC to continually improve processes and identify new ways to serve citizens.*

The Panel believes the efforts undertaken by the Agency for this initiative appear to be the proper ones, but, as with several other items in the action plan, this effort is not mature enough to be fully evaluated at the present time.

6. Customer Satisfaction

The EEOC has a diverse set of stakeholders including business entities of all sizes, federal employees, attorneys, and individual citizens, who receive the most attention. As the strategic plan indicates:

> *According to those surveyed [by Gallop], 31% of Asians, 26% of African Americans, 18% of Hispanics, 12% of individuals with disabilities, 22% of women, and 17% of persons 40 years of age or over believed that they had been subjected to employment discrimination within the previous year. ...[These numbers] also tell us that much work remains to be done before the promise of equal opportunity becomes a reality, and that many Americans will continue to rely on EEOC.*

The strategic plan contains two long-term measures for attaining its strategic objectives. The first addresses the number of individuals benefited by EEOC's outreach and enforcement programs. The second speaks directly to the need to assess "customer satisfaction":

> *Percent of the public confident of EEOC's enforcement of Federal equal employment laws.*

The action plan notes that EEOC contracted with the CFI Group to conduct a customer satisfaction survey that was completed in early 2006 with results reported to EEOC in March, 2006. The OIG report recommended that NCC implement an ongoing customer satisfaction measurement process. The OIG specifically mentioned the preference for ongoing data

collection versus one-time efforts. In addition, it found fault with the use of the IVR option after each call to gather customer satisfaction data, since the self-selection is likely to introduce bias into the results. EEOC has designed an ongoing customer satisfaction (with NCC) survey and has submitted it to OMB for approval.

The action plan progress reports include both completed and projected milestones for this effort:

- *Publish in Federal Register.* Completed November 2006.

- *OMB approval.* Expected by February 2007.

- *Initiate survey.* Scheduled for March 2007

- *Collect data and publish results.* Pearson will collect the data and EEOC will publish the results. As of this writing, no publishing date has been set.

- *Initiate changes to address customer concerns.* The plan includes no details as to how the Agency will monitor and track this initiative.

The key feature of collecting customer satisfaction data is how the data are used to improve satisfaction rates. The Panel believes it is important for EEOC to view the completion of this action plan initiative as the *first step* in a long-term process for using the information gathered to make the Agency better from a customers' perspective and to improve internal business processes. Customer satisfaction is important only if it is repeatedly and consistently measured and drives organizational changes. The action plan would benefit from additional detail as to how the data will be used to make improvements.

7. Change Management

Managing change is a much discussed topic that is frequently ignored as more tangible activities such as buying new equipment, revising the organization chart, installing new software, and moving offices consume time and energy. Fortunately, since change is ubiquitous, constant and almost always disruptive, change management has received a great deal of attention, and useful theories, tools and techniques have been developed. Sufficient observation and research have been completed to provide useful perspectives including the identification of mistakes frequently made during change. One experienced practitioner reported the following list of common mistakes.[16]

- Not understanding the importance of people. Organizations don't change—people do, or they don't.

---

[16] Goman, Carol Kinsey *The biggest Mistakes in Managing Change* innovative leader, Vol. 9, Number 12 December 2000.

- Not appreciating that people throughout the organization have different reactions to change[17].

- Treating transformation as an event rather than a mental, physical and emotional process.

- Being less than candid, i.e., not proactively, even aggressively, sharing of everything — the opportunities, the risks, the mistakes, the potentials and the failures.

- Not appropriately "setting the stage" for change.

- Trying to manage transformation with the same strategies used for incremental change. Transformations are not linear and therefore not predictable.

- Forgetting to negotiate the new "compact" between employers and employees. People know what they are losing—they need a clear picture of what to expect in its place.

- Believing that change is what employees heard or read from headquarters. Behavioral-based communication imbedded in ongoing informal comments and daily and weekly interactions account for 90 percent of what employees learn.

- Underestimating human potential—not harnessing the intelligence, capability, and creativity of employees to make the change a success.

The OIG report recognized that the implementation of NCC required implementing change management procedures with a variety of activities:

> *[A change management process] should include defining and making visible the reasons that NCC is important, articulating the vision of NCC, removing some of the obstacles encountered to date…and celebrating and building on short term wins…. It is important to communicate with employees on a regular basis. This communication could come in the form of a web page on EEOC's intranet that would be accessible to CSRs. The existing NCC Newsletter should evolve into a means of communicating information in addition to successes*

Although the focus during the initial start-up phases for NCC was on keeping top management informed of the changes taking place, it appears, based on interviews with EEOC managers and employees, that the amount of attention being devoted to change management at mid management levels has increased substantially in the past few months. The September 2006 intake supervisors conference in Kansas, the establishment of field work groups, the participation of EEOC staff in training new CSR's, and weekly, monthly, and quarterly calls and teleconferences have been noted favorable by interviewed employees. Although these events are all considered as valuable, it was noted that they are scheduled and typically involve large groups

---

[17] Nancy Barger and Linda Kirby recognized the relationship between response to change and Myers Briggs types in their workshops and their book *The Challenge of Change in Organizations: Helping People Thrive in the New Frontier.*

of participants. No opportunities for direct contact between EEOC managers and NCC on a case-by-case, as-needed basis were identified.

Comments collected during interviews suggests that some EEOC employees continue to be concerned that CSRs will give out the wrong information, do not have the same values as EEOC employees (they just "work for pay"), and do not understand the importance of EEOC's responsibilities. In this regard, the NCC experience mirrors that of many other change situations—the need to understand and plan for changing perceptions at all levels in the organization are frequently underestimated.

It should be noted that prior to the opening of NCC, EEOC had a comprehensive (25 page) Outreach Plan to identify *"the messages, audiences, media, and timing of Outreach activities before and after the launch of the National Contact Center."* This plan was *"designed to engage key stakeholders in a manner that supports that mission... (and to) provide an overview roadmap for NCC outreach planning that emphasizes the importance of communicating to all EEOC stakeholders."* The Plan would also provide a mechanism *"to develop a framework for EEOC to distribute consistent information about the purpose and benefits of the Contact Center, and receive feedback from stakeholders and the public to ensure that NCC is fully utilized to the benefit of the public and the agency."*

While the Outreach Plan is impressive in its scope and depth, given the change management shortcomings that arose from the implementation of NCC, there is little evidence to suggest that the Plan was closely followed. This is a mistake that EEOC appears to be trying to avoid in its current Change Management initiatives:

- *Intake supervisor's conference.* The Agency brought its field intake supervisors to NCC for orientation and group interactions and discussions. The study team heard from various field supervisors that the conference was a very positive experience for both EEOC and NCC staff.

- *Field working groups.* Working groups of field managers were created to review NCC scripts and IMS code scripts, develop Hotline Standard Operating Procedures and improve customer awareness. Concerns raised by the OIG study regarding CSR skill levels have driven some initiatives: Intake supervisors in the field help with revising CSR scripts to be more customer-friendly; and field staffs help with assessing CSR performance in terms of accuracy of information captured from callers and accuracy of information provided to field offices and soft skills. These 'calibration' sessions are held weekly.

- *Conference calls.* Routinely scheduled calls which include headquarters, field staff and NCC staff have provided a forum for raising and dealing with problem issues.

These change management initiatives are designed to increase field staff involvement in NCC improvement efforts. This not only improves the quality of the initiatives undertaken but also significantly improves the communications with and understanding of NCC by field personnel. The study team heard a number of positive comments from field staff about these recent

headquarters initiatives that made it clear that the Agency has put forth a lot more effort recently to be more inclusive and flexible in its planning for NCC improvements. The Panel commends EEOC for this change and urges it to continue these efforts.

The Panel believes that with the increasing standardization of the intake process, a number of aspects of the complete discrimination complaint, investigation and resolution processes should be considered from a business process re-engineering perspective. If the Agency pursues such an effort it should enlist the help of a change management expert, from within or externally, to insure the further development and implementation of its change management efforts.

8. Costs and Benefits of Alternatives

This topic is one of the two to be covered by the Academy report and is addressed in Chapter 5 of this report.

9. Steering Committee

In an effort to realize the potential positive impact of NCC, the OIG recommended that EEOC establish a Steering Committee composed of representatives from all stakeholders including field management and union employees, headquarters personnel and NCC employees. This group would be assigned the task of establishing processes to integrate the systems and procedures of EEOC offices and NCC, increase operating efficiencies, and improve end-to-end customer satisfaction.

- *Create an EEOC/NCC process integration steering committee.* The EEOC action plan includes an initiative to establish a steering committee. Milestones for getting the committee up and running have been noted in several documents and indicate that delays have been experienced. An early progress report indicated that the request for nominations would be issued 10/10/06 with a due date of 10/20/06. The kickoff meeting was scheduled for October. Later the kickoff meeting was rescheduled for November. Nominations were submitted in December and the first meeting was scheduled for January 2007.

At the time this report is being written, the effectiveness of the Steering Committee can't be determined, but its establishment would be a positive step towards process improvement and can serve as an important vehicle for change management.

ACTION PLAN AND THE AREAS OF SPECIAL FOCUS

EEOC has expressed an interest in having the Panel consider the action plan with respect to six specific areas. A number of these areas were addressed directly or indirectly in the preceding material, and are recapped below.

Planned Oversight Procedures Proposed by EEOC

With the exception of the establishment of a Steering Committee and the function it is expected to perform there are no explicit references to EEOC oversight of NCC in the action plan. On the other hand, some of the activities reported in conjunction with Plan implementation, such as the emphasis on monitoring customer satisfaction, the establishment of working groups, regularly scheduled conference calls, etc., indicate a more intense interaction between the two entities. Although Pearson hired a former high level manager from EEOC to facilitate understanding and communication between the two organizations, EEOC has not hired any individuals with experience in call center operations to provide an analogous capability.

The Panel believes that EEOC would significantly benefit from having a manager with a good grasp of call center operations, including the understanding of key performance metrics and vendor/contract oversight. The Agency needs integrated governance processes to effectively manage the vendor relationship which is dynamic with change to be expected. This individual would provide consistency in working with the service provider and assure clear alignment of roles and accountabilities including:

- Financial—ensuring that reporting and invoicing are accurate

- Contractual—ensuring that the obligations of both parties are effectively managed

- Service Performance Management—making sure that performance meets the requirements, and that issues with service delivery are resolved quickly

- Customer Relationship Management—ensuring that recipients understand the services, and that changes in requirements are communicated to the provider in a consistent manner

- Program and Change Management—leading change relating to the transition and transformation of services because over time, changes to scope, services and performance will occur.

The Panel believes the Agency could choose to recruit and hire someone with this experience or could develop this experience by exposing an experienced EEO manager to other agencies who either manage their own call centers or who also have contracted out the work. NCC will perform best when both the Agency and the Contractor have comparable abilities to understand and oversee the work being performed.

The Effective Use of Technology

Since telecommunications equipment and computers are two of the three critical components of a call center, this topic is critically important. Recent changes in operating procedures such as the proposed integration of NCC's *RightNow* system with EEOC's IMS system suggest that the importance of effective use of technology is appreciated. On the other hand, as the pressures and

crises of fully implementing the NCC are addressed and the planning horizon is extended, it will be important to focus attention on monitoring and applying new and emerging technologies.

The Panel believes EEOC is headed in the right direction regarding making technological improvements to fix already identified problem areas. However, the Agency should continue to research other technologies that could further improve the intake process, including the use of on-line intake questionnaires (as discussed earlier in this chapter). The development of more robust management information systems is now possible with the electronic capture of phone traffic data that can provide operating performance measures as well as long-term performance and client information.

Necessary Staffing Levels and Competencies

Anecdotal evidence indicates that the operating parameters of NCC are becoming clearer as managers in both organizations obtain more experience. Original estimates of call volumes and the time required to handle calls proved inaccurate. Recent changes in procedures such as mailing out questionnaires rather than taking the information over the phone have substantially reduced connect time and the time needed to record information at the conclusion of the call. Although the action plan does not explicitly address staffing levels it is an item that will be addressed out of necessity by both parties. The competencies of the CSRs continue to be mentioned as a concern although the dynamics of the situation will probably cause this concern to continue even after deficiencies have been corrected.

NCC did not meet speed-of-answer service goals from June 2006 through November 2006. Call duration during this time was longer than anticipated due to procedural, technological and staffing issues, which resulted in long wait times and a high number of abandoned calls. While process changes contributed to the problems (and to the solution), some of the problem performance was the result of staffing shortfalls at NCC, a situation which EEOC should have pressed Pearson to address more quickly. While staffing levels have subsequently been adjusted (and process changes implemented) and the problems largely resolved, the Panel believes EEOC needs to move more quickly to identify and resolve any future issues. Answering calls in a timely manner is a critical and fundamental function of a call center.

If more phone traffic is directed to NCC as is currently planned, the Agency will need to pay close attention to performance metrics such as speed of answer to make sure staffing levels are appropriate. The same is true if workload at NCC does not stay high enough to support the existing staff. EEOC has recently conducted a follow-up survey of field office phone traffic, and the data are being compiled and analyzed as this report is being written. This should provide a more accurate picture of the current field office phone call volumes.

The Agency is at the beginning of a transformation in how it performs its core business processes in the field. With the increasing standardization of the intake process, there is a major opportunity to re-engineer a number of aspects of the complete discrimination complaint, investigation and resolution processes and to align staffing to capitalize on these changes.

Appropriate Staff Training and Development

Inadequate training of NCC staff in EEOC processes and policies was frequently mentioned in field office interviews conducted by study team members. This was usually pointed out in the context of NCC actions that resulted in inappropriate referrals, poorly written descriptions of the complaint, erroneous jurisdictional assignments, and other items that resulted in additional work for the offices handling the issue. There also seemed to be an unclear understanding of NCC policies and operations by EEOC field staff.

Interviewees said that the problems have diminished over time and the decline of complaint volume reinforces this view. There are several reasons contributing to this improvement including NCC staff becoming more experienced, improvements made to training, and better feedback mechanisms for tracking and resolving problems.

A very important step towards improving staff development and training was taken in September 2006 when EEOC convened a meeting of its field intake supervisors at the NCC. The exchange of information between EEOC and NCC staff resulted in important improvement efforts in a number of areas including the identification and tracking of NCC performance issues, and improvements made to training and phone call scripts provided to NCC staff. Ongoing conference calls and work groups keep these improvement efforts going forward in a number of key areas. Just as important, this exposure to NCC by EEOC staff has improved the knowledge and awareness of NCC operations in field offices. While more work needs to be done, this is an important step in improving communications concerning NCC.

The Panel believes the Agency should also consider sending NCC staff to visit field offices to observe the end-to-end process. These types of critical change management program activities will lead to better trained people and more effective communications. A comprehensive training program coupled with exposure to field office operations could provide an important developmental program for NCC staff members.

Employee Involvement

The initial planning and start-up efforts for NCC were characterized by significant EEOC staff involvement including the initial assessment of the call center option as well as the planning for the NCC opening. After NCC opened, there was an extended period of time—over one year— when there is little evidence of systematic employee involvement. This resulted in many of the issues later identified in the OIG review to go unrecognized and unresolved. As noted earlier, the Outreach Plan called for using stakeholder feedback to drive improvement efforts, but there is little evidence of this having taken place. This drove miscommunications, misunderstandings, and, in general, created more resentment and distrust of NCC efforts than was necessary. As noted by one interviewee: *"(EEOC) Headquarters shouldn't have waited a full year to make changes and adjustments to NCC processes that were clearly problematic."*

The Panel believes it is essential that EEOC not repeat this experience with its current action plan efforts and as noted earlier, there appears to have been a substantial increase in organizational communication and participation in the past few months. Effective change

management requires employee involvement throughout the process and beyond the accomplishment of a steady state condition. Encouraging more EEOC field manager to NCC manager communications could produce a more empowered and likely more supportive workforce as would getting feedback from employees at all levels.

The study team was shown a write-up of a field office's direct feedback to NCC regarding NCC-mailed questionnaires. This appeared to be a beneficial exchange for both organizations. The Panel encourages the Agency to formally support such exchanges while recognizing that Headquarters staff members also need to be kept apprised in order to correct major process deficiencies and capture best practices.

The Level of Resources Needed to Support the Function

The determination of resources needed to bring NCC operations into EEOC and discussion of the resources needed to operate NCC in its current configuration are the focus of Chapter V.

CONCLUSIONS AND NEXT STEPS

The Panel believes the Agency could have made a better business case for NCC, and more attention and resources should have been focused on what was actually taking place after NCC got off the ground. When problems were identified in the early stages, remedial actions were not aggressively pursued. These problems were compounded by the EEOC's inexperience with call center operations and its lack of baseline metrics, defined goals and benchmarks for the various initiatives.

Starting in the summer of 2006, the Agency began to aggressively address the problems that arose from these shortcomings; progress since then has been noteworthy. The Panel's overall assessment of the current action plan is that it will achieve full implementation of NCC, but there are areas of the action plan that need more attention. With that in mind, the following recommendations and suggestions are offered for consideration:

Recommendations

- Given the considerable changes that are taking place to the intake process, EEOC should take a more comprehensive look at its core business practices and consider a wide-ranging business process re-engineering review, including increased standardization of processes.

- EEOC should employ a manager with call center experience who can oversee financial and contractual management, service performance management and customer relationship management.

- EEOC should enlist the help of a change management expert, from within or externally, to insure the further development and implementation of its change management efforts.

- EEOC should establish milestones to monitor customer satisfaction using the new uniform intake questionnaire.

- The Agency should pursue the use of interactive electronic intake questionnaires.

- EEOC should share the metrics and analyses used to measure NCC's success with its customers and relevant stakeholders.

- EEOC should closely monitor the implementation of changes to local EEOC office phone listings and all efforts to route more calls to NCC to ensure that these efforts are proceeding as intended.

- EEOC should view the initiative to collect customer satisfaction data as the first step in an ongoing, long-term process to make the Agency better from a customer's perspective.

- More direct contact should take place between EEOC field staff and NCC staff (E.g., having Customer Service Representatives visit field offices to observe the end-to-end process and holding joint training sessions) in order to build better relationships between the organizations.

CHAPTER V

COSTS FOR REPLICATING NCC OPERATIONS WITHIN EEOC

The Academy was asked to provide an estimate of the costs to replicate NCC operations within EEOC (in-sourcing). These estimates have been made using comparable staffing, processes, technology, and equipment and include the resources EEOC would need to re-establish a comparable operation within the agency. The estimates are broad-based and generic in nature. More precise estimates would require a more formal Request for Proposal (RFP) or similar effort to gather detailed information on specific equipment, technology, etc. For this reason, this analysis should not be used for final budgeting or funding of an internal NCC operation.

EVALUATION PROCESS

The estimates in this study include the costs of major human capital and technology components required to operate a NCC within the agency. Interviews with onsite EEOC and Pearson staff identified capabilities currently in place. Certain technologies are owned by EEOC and can be transferred (with associated costs) to an internal center. The contract between EEOC and Pearson gives ownership rights to EEOC for "all data, training materials, desktop content (scripts), software applications, and other products and information resources developed under the contract." These are the property of EEOC. Other technologies are owned by Pearson and are not transferable under the contract. These technologies will need to be purchased by EEOC from third-party suppliers in order to duplicate current operations. Such technologies have been identified and associated costs have been estimated independently of Pearson input and, when feasible, verified with third parties.

Interviews identified the number of staff at NCC and staff required to establish a comparable in-sourced operation. Presently, some staff are dedicated to NCC activities while others are Pearson corporate staff that allocate time to NCC and other clients in the Lawrence, Kansas facility. The staffing estimates are based upon a representative month and the metrics currently in place to meet service requirements including speed of answer and qualitative measures. The staffing hours/headcount to replicate existing services are consistent with grades and rates supplied by EEOC. Shared staff would need to be replaced with new dedicated resources to support technologies and other functions required to operate the center.

EEOC advised the study team that NCC, if in-sourced back to the Agency, would be a standalone operation located in a labor market designated as the "Rest of the United States."[18] This allows EEOC to locate in an area that does not require a premium be paid to NCC staff. However, it also assumes there would be no existing EEOC resources to share (technology staff, human resources support, facilities support, etc).

---

[18] Office of Personnel Management General Schedule Locality Pay Table. Consisting of the portions of the continental United States not located within another locality pay area.

The analysis assumes EEOC would rent a facility. The rationale for the size, rental rates and leasehold improvements are provided. EEOC has also determined that administration of questionnaires would be provided by a third party selected by EEOC. Such costs are excluded from this analysis.

NCC has a disaster recovery plan in place that utilizes other Pearson facilities, which includes duplicate technologies, space and other essential capabilities. The recovery facility is within six hours of Lawrence and trained staff can be transported. To duplicate this capability, EEOC would need to contract with a third-party disaster recovery organization. Such costs have been estimated.

Finally, costs tend to fall into two categories: one-time transition and ongoing/annual. The cost factors are typically human capital or technology. The attached models delineate these costs and the associated assumptions.

TECHNOLOGY EVALUATION

To receive calls, NCC maintains two toll-free numbers (800-669-4000) and a second TTY number for the hearing-impaired (800-669-6820). Messaging recently has been added at local field offices which direct callers to use the 800 number to reach NCC and a third "shadow 800 number" to aid callers who have to speak to someone in a field office. These toll-free numbers are transported over three T-1[19] lines to Pearson's facility in Lawrence, Kansas. Each T-1 line supports 24 calls. NCC reports it does not have any call blockages[20]; therefore, T-1 capacity appears adequate. In addition to calls, faxes are sent to a third party and emailed to NCC for resolution. T-1 lines, 800 number usage charges and outbound usage charges are all paid directly by EEOC to the carriers. T-1 lines would need to be installed and maintained at an in-house center.

The three T-1 lines currently connect into Pearson's Automatic Call Distributor (ACD)[21] and are routed to a NCC dedicated *Intervoice Brite* Interactive Voice Response (IVR)[22] platform which allow callers to self-serve and/or during operating hours opt to speak with a customer service representative. Typically 25-35 percent of callers have their questions answered by the IVR. Software applications in the IVR include rules for filing claims and the opportunity to receive publications. The IVR has 48 ports serving a maximum of 48 simultaneous calls. This capacity appears to be adequate and there is no call blockage. The IVR server and software were purchased as a package from *Intervoice Brite* and the technology is located at NCC and used exclusively by NCC. The *Intervoice Brite* software is maintained by Pearson programmers to develop specific "trees" or applications for NCC.

---

[19] A T-1 line is a special type of telephone line for digital communication and transmission and is the standard for digital transmissions in North America.

[20] A blocked call is one which can't get through to the number dialed, that is, the caller receives a busy signal.

[21] An ACD is a device that handles heavy incoming call volume. It sends a call to the first available answering position or, if all positions are busy, plays a recorded message and puts calls in a queue until an answering position becomes available.

[22] An IVR is a communication device that provides interactive menus for callers to use to input data using a touch-tone telephone keypad.

The *Intervoice Brite* technology is owned by EEOC, and, excluding Computer Telephony Integration (CTI)[23] components, is transferable. An in-house NCC would need to support the *Intervoice Brite* IVR platform. Ongoing maintenance to server logs, version upgrades, backups, and application changes are also required.

After calls pass through the IVR trees, callers can opt to speak with a NCC representative Monday-Friday during the hours of 7 am to 7 pm Central Time. (The IVR trees are available at all times). These calls are passed back to the ACD. The switch uses an application designed to route calls to a NCC agent group including directing calls to an agent with appropriate skills for handing the call (e.g., foreign language fluency). The ACD is a Pearson-owned technology and is shared among all clients at the Pearson Lawrence, Kansas facility which operates a number of call centers and houses approximately 1400 employees.

An in-house NCC would need to purchase an ACD switch. There are many ACD/switch vendors and configurations with capabilities from which to choose. The switch would be sized to NCC operations. Typically these switches can be expanded to some capacity limit (at an additional cost) as more calls and agents are added.

In-house NCC staff would need to support this technology after the vendor helps develop the initial applications. Ongoing maintenance and upgrades are required and would need to be coordinated with the supplier. For example, after-hour and holiday messaging is an internal maintenance function as is adding and removing agent log-ins. It is assumed for disaster recovery that a second switch would not be required and that EEOC would contract for this back-up capability with a disaster recovery provider.

After callers enter the IVR, those that choose live CSR support are sent back to the switch through CTI servers. The CTI technology populates the agent desktop application (*RightNow*) with demographic information using a third-party, white-pages lookup of the caller's address and adds any information captured in the IVR. In effect, this information about the caller arrives at the agent desktop along with the call.

It was represented that this capability and the integration with the ACD are an investment borne by Pearson. This one-time cost would need to be incurred at an in-house center to provide similar functionality with a new switch utilizing a white-pages-lookup service.

NCC also records selective calls using a *Nice Call* Recording System. Call recording is a valuable tool to efficiently monitor phone calls and assure agent quality. Monitored calls are entered into a system to help track CSR compliance. Some systems (not NCC) can also capture agent screen activity. This technology is owned by Pearson and is not transferable to EEOC.

There are many call recording platforms on the market including *Nice* and *Witness*. Call recording technology is sized to the center and would need to be purchased and maintained at an in-house center. A monitoring database and reporting system would also be required and could be purchased as part of the recording technology.

---

[23] Computer Telephony Integration provides a link between telephone systems and computers to facilitate incoming and outgoing call handling and control; the physical link between a telephone and server.

Workforce management software is used to schedule agents according to expected call flows and to measure agent adherence to schedules. This technology helps drive efficiency in the center and helps meet service levels. NCC currently uses *Aspects Eworkforce Management* software. This technology is owned by Pearson and is not transferable. Workforce management software would need to be purchased for an internal center and would require ongoing support.

Pearson represents that it provides a secure technology/data center where the ACD servers, routers, firewalls, IVR and other technology are stored. This is provided on-site in Lawrence, Kansas and/or at Pearson's data facility in Iowa. Uninterruptible Power Supply (UPS)[24] backup and a diesel generator assure the center maintains power even if the power supply from the local utility is interrupted. In addition, multiple access points to telephony carriers are in place in order to prevent loss of calls in the event lines to the facility are cut or one carrier's service fails. A secure data center would need to be established at an in-house center

To capture caller data, information is entered by CSRs into the *RightNow* Customer Relationship Management (CRM) platform. CSRs have "read only" access in EEOC's Integrated Mission System (IMS). IMS is EEOC's internal data warehouse where complaints and mediation issues are tracked. *RightNow* handles all basic information capture for calls and correspondence and provides a knowledge base for the CSRs. At this time, there is minimal integration between these environments, although there are plans to integrate data between the two systems. *RightNow* is hosted at a *RightNow* facility and accessed via a secure web connection.

For an in-house NCC, maintenance and hosting would need to be purchased by EEOC from *RightNow*. The in-house NCC would also need staff to support the *RightNow* platform.

REVIEW OF STAFF AND FACILITY REQUIREMENTS

The Executive Director of the National Association of Call Centers noted during an interview with a study team member that 60-85 percent of the operating costs of call centers are personnel related. In the attached analysis of ongoing in-house costs, 78 percent are personnel-related.

Based on interviews with Pearson, the current staff dedicated to NCC is as follows:

- 1—Program Manager (located at Pearson facilities in Virginia; not required for an in-sourced center)

- 1—Site Manager

- 3—Team Leads (support reporting, content management and timekeeping/scheduling)

- 40-50—Tier 1 and Tier 2 CSRs (Tier 2 CSRs constitute approximately 10 percent of total CSRs and do coaching, monitoring, and handle correspondence and escalated issues)

---

[24] A UPS is a special power source which takes over in the event of a failure in the main power system.

The attached analysis estimates the level of staffing required for a representative month of 52,000 calls offered, 10,000 emails and 100 faxes. The costs and volumes are then annualized. (745,200 total contacts). This information is used for in-house staffing estimates and compared to transaction pricing from Pearson. This volume does not necessarily represent volume estimates assumed in the contract. It is used for comparing the relative costs of in-sourcing to outsourcing under a common set of assumptions.

The Pearson infrastructure (non-dedicated staff) provides human resource support for hiring, personnel issues and a quality and training manager that coordinates with Tier 2 staff helping with coaching and skill-set issues.

An in-house NCC would also need the following:

- 1—trainer

- 1—human resource/facilities manager

- 1—Administrative resource

Because numerous technologies would need to be supported in the new center, a senior technical manager would be required. This individual would be responsible for the overall site technology infrastructure managing the following support team:

- Telephony/IVR /CTI specialist to maintain these technologies and relationships with the telephone carriers and vendors.

- Programmer to support the *RightNow* platform and maintain relationship with *RightNow*

- Personal Computer and Network Support Specialist to be responsible for all network activities and operations of the hardware and software in the center.

EEOC has provided grade and salary levels for the staff required. The total staff estimate for an in-house center would be 65 employees including 54 CSRs. The attached analysis estimates the facility size for 65 employees based on square footage requirements supplied by EEOC. The estimate is approximately 10,000 square feet.

The cost for space and leaseholds depends upon the location of the center and its condition and suitability. A representative from Trammel Crow's[25] call center group provided a fully loaded price per square foot including leasehold improvements, design and data center of $22-$24 for a 10-year lease. (As a point of comparison, the average rent paid by the EEOC for field offices as of September 2006 was $25.14 per sq. ft.). These figures include rent, leasehold improvements, and specific requirements for call centers including a diesel generator, a fire prevention system, a UPS battery back-up system and a security system and other miscellaneous call-center-specific

---

[25] Trammell Crow Company is one of the largest real estate services companies in the world. Mr. White is the manager of the Corporate Site Selection Group.

requirements. Workstations and personal computers for each CSR, offices and furniture for staff, training facilities and equipment, cafeteria space and facilities are all estimated.

The National Association of Call Centers also estimated that a one-time technology and facility build-out would cost $10,000-$20,000 per CSR for a center of at least 100 CSRs or $1,000,000 to $2,000,000 total costs. (There were no data points for facilities smaller than 100 CSRs). The attached model estimates a one-time technology and facility cost of approximately $2,000,000 excluding personnel hiring costs. In the one-time cost of opening a center there is a significant fixed cost component to purchasing and implementing the diverse technology required. The estimate of one-time costs, excluding hiring and training, of approximately $2,000,000 seems reasonable for replicating the existing operation.

Tables 1 and 2 below shows the costs to build and maintain a similar facility in-house as compared with maintaining the existing NCC outsourced arrangement. Costs are shown on both a one time and annual basis. The cost to outsource is based upon the current transaction rates with Pearson. The one time costs for both in-sourcing and outsourcing exclude any ongoing improvement initiatives which will likely cost the same under either scenario. The one-time costs to outsource estimates the cost to train 10 additional CSRs to join the current team of approximately 44 FTE at Pearson which is taking place as this report is being written.

The complete study assumptions, projected call volumes and space requirements for in-sourcing can be found in attachment A. The outsource estimates, which contain Pearson proprietary information, are not published in this report, but were used as a basis for the above estimates. Clearly, the costs for moving the work back into EEOC would be much higher than retaining the status quo but the pros and cons for making such a change would need to be considered in the second phase of this study.

The Costs of Replicating NCC Operations within EEOC

To determine the costs for replicating NCC operations within EEOC, the study team evaluated the technologies needed to run a call center, as well as staffing and facility requirements. The one-time costs for moving NCC in-house are estimated to exceed the current outsourcing costs by $2 million. ($2.3 million versus $.3 million[26]). The ongoing annual costs for moving the work back into EEOC is estimated to be $2.8 million more per year than maintaining the existing arrangement. ($5.5 million versus $2.7 million).

---

[26] This cost differential results from the fact that EEOC never had a centralized, in-house call center, and, to open one, it would need to replicate the facilities, workstations, telephony technology, etc., that currently exist at NCC.

Table 1
Cost to Open an in-House Call Center

Cost Type	One-time	Ongoing
Personnel	$ 243,988	$ 4,455,099
Personnel-Related	$ -	$ 115,200
Facilities	$ 638,500	$ 345,045
Workstations	$ 335,000	$ 35,100
Telephony-Carrier	$ 25,000	$ 103,128
Telephony-IVR	$ 25,000	$ 43,200
Telephony-Switches	$ 500,000	$ 90,000
Telephony-Other	$ 535,000	$ 129,971
CRM Software	$ -	$ 64,000
Network/Data Center	$ -	$ -
Disaster Recovery	$ -	$ 150,000
Total	$ 2,302,488	$ 5,530,743

Table 2
Comparison of In-Source to Outsourced Call Center Costs

	In-Source (Move to EEOC)	Outsource (Stay with Pearson)
One-time Costs	$2.3 million	$0.3 million
Ongoing Annual Costs	$5.5 million	$2.7 million

CONCLUSIONS AND NEXT STEPS

The decision to leave the current arrangement with Pearson in place, move the operations in-house or move NCC to another supplier are all options EEOC may consider. Given the costs involved with any move away from the current arrangement as well as the fact that many action plan initiatives are still being implemented, the Panel believes that maintaining the current arrangement is the most prudent course for the time being. With that in mind, the Panel makes the final recommendations:

Recommendations

- EEOC should maintain the current outsourced arrangement with Pearson Government Solutions for the time being until and unless a more detailed, comprehensive cost analysis is conducted of alternative options.

- EEOC should benchmark the services it receives from Pearson Government Solutions against industry standards for outsourced call-center-related services to ensure that it is receiving value

47

- EEOC should establish and manage an ongoing outsourcing management/governance program, including a set of integrated governance processes designed to provide consistency in working with the service provider and to ensure clear alignment of roles and accountabilities.

- The Agency should maintain a backup IVR unit capable of taking calls at the disaster recovery location.

NCC COST PROPOSAL

Summary of Costs to Replicate NCC

Cost Type	One-time	Ongoing
Personnel	$ 243,988	$ 4,455,099
Personnel-Related	$ -	$ 115,200
Facilities	$ 638,500	$ 345,045
Workstations	$ 335,000	$ 35,100
Telephony-Carrier	$ 25,000	$ 103,128
Telephony-IVR	$ 25,000	$ 43,200
Telephony-Switches	$ 500,000	$ 90,000
Telephony-Other	$ 535,000	$ 129,971
CRM Software	$ -	$ 64,000
Network/Data Center	$ -	$ -
Disaster Recovery	$ -	$ 150,000
Total	$ 2,302,488	$ 5,530,743

49

APPENDIX A

Functional Costs to Replicate and Assumptions

Training = Average non-technical salary x 2 weeks per person- provided by EEOC
Recruiting - $1K-3K per person
Attrition - 5% extra training

Call center design consulting - $250K-750K
Furniture for common area's estimated - $138.5K

Desktops/Software/Servers $2k-$4k per employee
Call center cubicles $2-$3 K per employee

One-time Costs

Personnel

	# of Employe	Cost Per	Total
Training	62	$ 1,839	$ 113,988
Recruiting	65	$ 2,000	$ 130,000
			$ 243,988

Personnel-Related

	Total
	$ -

Facilities

	Total
Call center design consulting	$ 500,000
Office furniture	
Conference room	
Break Room	
Training Room	
	$ 638,500

Workstations

	Total
Desktops/Software/Servers	$ 195,000
Call station workstations	$ 140,000
	$ 335,000

On-going Costs

Grades based on step 5 at each level:

Tier 1 GS-5/7/9	Facilities/HR Manager GS-13
Tier 2 GS-12	Senior Technical Manager GS 14/15
Supervisors GS-13	Fulfillment G-5
Site Manager GS-15	Telephony/IVR/CTI specialist-GS 13/14
Trainer GS-13/14	RightNow Programmer GS-13/14
	PC/Network Specialist GS-12/13

Fully loaded benefits = 36.45%

Personnel

	Number	Salary	Bonus	Benefits	Total
Tier 1	49	$ 1,961,906		$ 715,115	$ 2,677,021
Tier 2	5	$ 352,975		$ 128,659	$ 481,634
Supervisors	3	$ 251,847		$ 91,798	$ 343,645
Site Manager	1	$ 116,691		$ 42,534	$ 159,225
Trainer	1	$ 99,203		$ 36,159	$ 135,362
Facilities/HR Mana	1	$ 83,949		$ 30,599	$ 114,548
Senior Technical M	1	$ 99,203		$ 36,159	$ 135,362
Fulfillment	1	$ 32,130		$ 11,711	$ 43,841
Telephony/IVR/CTI	1	$ 83,949		$ 30,599	$ 114,548
RightNow Program	1	$ 99,203		$ 36,159	$ 135,362
PC/Network Specie	1	$ 83,949		$ 30,599	$ 114,548
	65	$ 3,265,005		$ 1,190,094	$ 4,455,099

Personnel-Related

Estimated at $1500-$2100 per employee

	Total
Dues, Memberships, Subscriptions	
Meetings - Safety, Diversity, Social	
Employee recognition	
Travel	
Ongoing training (attrition)	
Office supplies	
Ongoing hiring	
	$ 115,200

Facilities

Lease space 15-20K sq ft @ 22-24 per square foot
Security - 5 days x 12 hours x $15/hour
Lease space Includes maintenance, engineering, moving, and property taxes, as well as leasehold improvements
Generator and UPS are included in the leasehold improvements
Assumes 10 year lease

	Sq ft	Total
Lease space - xx	15,995	$ 367,655
Utilities	15,995	$ 103,903
Security		$ 46,800
		$ 518,358

Workstations

18% maintenance on desktops/software

	Total
Maintenance	
Desktops/laptops	$ 35,100
	$ 35,100

Functional Costs to Replicate and Assumptions (Continued)

One-time Costs

> Estimate of $25K set up fee to move technology

> Transferred to EEOC from Pearson
> Estimated charges to move platform = $25K

> 100 total users (includes admin users) @ $5K per user
> Includes setup and testing

> CTI - est. cost of $100K-$300K provided by Right Now
> Call recording - 70 users x cost of $2K to $4K per user
> Call monitoring database - est. $25-50K
> Workforce Management - 70 users x cost of $500-$2K per user

Telephony-Carrier

	Total
Placeholder for other potential Carriers	$ 19,543
T-1 Installation	$ 5,457
	$ 25,000

Telephony-IVR

	Total
	$ 25,000
	$ -
	$ -
	$ -
	$ 25,000

Telephony-Switches

	Total
ACD Switch	$ 500,000
Testing and setup	
	$ 500,000

Telephony-Other

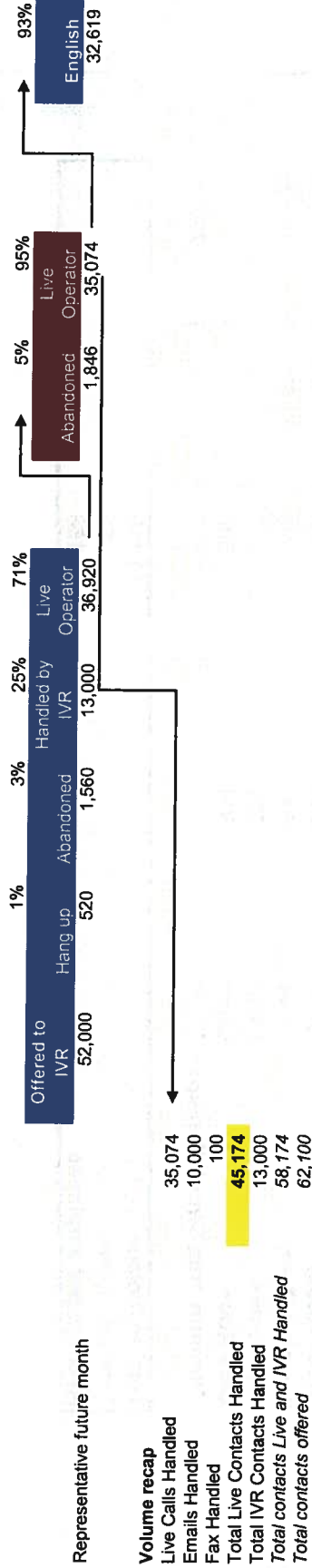|	Total
CTI Technology and integration	$ 200,000
Call recording technology	$ 210,000
Development of monitoring database	$ 37,500
Workforce Management Platform (e.g	$ 87,500
	$ 535,000

Ongoing Costs

> T1 = $211.52 x3 = 634.56 per month
> Toll free voice number average cost = $7936.00/mo
> Toll free TTY number average cost = $23.42/mo
>
> *Source: EEOC-provided data*

> Estimated ongoing maintenance
> 48 ports x 5000 per port x 18% maintenance

> 18 % maintenance

> 10 cents per lookup on White Pages Lookup
> 18% maintenance

Telephony-Carrier

	Total
Carrier Charges - toll free	$ 95,232
Carrier Charges - TTY 800 669 6820	$ 281
Carrier Charges - New number	$ 7,615
T-1 lines (3+1)	
	$ 103,128

Telephony-IVR

	Total
IVR maintenance	$ 43,200
	$ 43,200

Telephony-Switches

	Total
Maintenance	$ 90,000
ACD Switch	
	$ 90,000

Telephony-Other

	Total
Maintenance	$ 96,300
CTI Technology and Integration	
Call recording technology	
Call monitoring technology	
Workforce Management Platform	
White Pages Lookup	$ 33,671
	$ 129,971

Functional Costs to Replicate and Assumptions (Continued)

CRM Software
Total

Hosted at RightNow; no one-time cost

$ -

Network/Data Center
Total

Setup costs are included in lease rate

Raised Floor center
Backup generators/UPS
Panels/Access Points
VPN
Security

$ -

Disaster Recovery
Total

$ -

CRM Software
Total

Software maintenance = 40k per year
Dedicated data line $2K per month

		Total
Right Now CRM Software Maintenance	$	40,000
Dedicated data line to IMS Software		24,000

$ 64,000

Network/Data Center
Total

Maintenance costs Included in the lease rate

Maintenance
Backup generators/UPS
Panels/Access Points
VPN

$ -

Disaster Recovery
Total

Disaster recovery 100-200K per year

3rd party disaster recovery provider $ 150,000

$ 150,000

Representative Monthly Contract Volumes

Based on a review of historical invoices, a representative future month is estimated as follows:

Representative future month	Offered to IVR	Hang up	Abandoned	Handled by IVR	Live Operator
		1%	3%	25%	71%
	52,000	520	1,560	13,000	36,920

	Abandoned	Live Operator
	5%	95%
	1,846	35,074

	English
	93%
	32,619

Volume recap

Live Calls Handled	35,074
Emails Handled	10,000
Fax Handled	100
Total Live Contacts Handled	45,174
Total IVR Contacts Handled	13,000
Total contacts Live and IVR Handled	58,174
Total contacts offered	62,100

CSR Staffing Estimates

Days in month	21
Total Forecasted Contacts	45,174
% of Calls Answered in 30 seconds	70%
Average time per contact (minutes)	7.5
Contacts handled per hour (average)	6
Utilization of Staff per hour (average)	75%
Production Labor Hours	7,529
Scheduling Factor	8,858
Scheduled Hours/Month	163
Staff Required	54
Staff Required	54
Tier 1	49
Tier 2	5

Note –75% utilization is reasonable in industry

53

Potential Layout for Facility

Office/Cubicle Space by Job Type	Type	Sq Feet	Quantity	Extended Sq Footage	Furniture	Extended Amount for Furniture
Site Manager	Office	200	1	200	$ 5,000	$ 5,000
HR/Facilities	Office	175	1	175	$ 5,000	$ 5,000
Trainer	Office	175	1	175	$ 5,000	$ 5,000
Team Leads	Workstation	100	3	300	$ 5,000	$ 15,000
Technology Manager	Office	175	1	175	$ 5,000	$ 5,000
Technology/IVR/CTI specialist	Office	175	1	175	$ 5,000	$ 5,000
Programmer right now specialist	Office	175	1	175	$ 5,000	$ 5,000
PC/Network support specialist	Office	150	1	150	$ 5,000	$ 5,000
Fulfillment	Workstation	77	1	77	$ 5,000	$ 5,000
Tier2	Workstation	100	5	500	$ 2,500	$ 12,500
Tier1	Workstation	77	49	3,773	$ 2,500	$ 122,500
Total office/cubicle space by job			**65**	**5,875**		
Conference room	Other	400	1	400	$ 19,400	$ 19,400
Break Room	Other	400	1	400	$ 11,300	$ 11,300
Training Room	Other	500	1	500	$ 34,800	$ 34,800
Bathrooms	Other	750	1	750	$ -	$ -
Data Room	Other	500	1	500	$ -	$ -
Common area/Circulation space	Other		1	1,685	$ 23,000	$ 23,000

Total sq footage, cost	10,110
Total employees	65
Average per employee	**156**

PANEL AND STUDY TEAM MEMBERS

PANEL

Charles W. Washington, * *Chair*—Former Dean, School of Arts and Sciences, Clark Atlanta University; Professor of Public Administration, Florida Atlantic University; Chair and Director, John C. Stennis Institute of Government, Mississippi State University; Associate Dean and Professor, School of Government and Business Administration, George Washington University.

Mitchell Rice* —Professor of Political Science and Former Director, Race and Ethnic Studies Institute, Bush School of Government and Public Service, Texas A&M University. Former Associate Professor and Professor, Louisiana State University, Baton Rouge; Assistant Professor and Associate Professor, Southwest Texas State University.

Gordon M. Sherman*—Principal, Lamon and Sherman Consulting, LLC. Former Director, Fidelity National Bank. Former positions with Social Security Administration, Atlanta Region: Regional Commissioner; Deputy Regional Commissioner; Principal Staff Officer, Office of Atlanta Regional Commissioner; Administrative and Staff Assistant. Director on bank boards, profit and non-profit organizations, civic associations.

STAFF

Frank DiGiammarino, *Program Area Driector*—Director of the Executive Consortium. Has worked on the Federal Bureau of Investigation Transformation project with specific focus on field structure reorganization. Former positions include Director and DoD Practice Area lead at Touchstone Consulting Group, General Manager and Director of Program Management at Sapient Corporation, and Principal Consultant with the State and Local practice at American Management Systems.

Joseph Thompson, *Project Director*—President, Aequus, Inc., a management consulting firm. Former Under Secretary for Benefits, U.S. Department of Veterans Affairs. Director, VA Regional Office, NY. Chairman, Federal Executive Board, NY.

Jake Barkdoll, *Senior Advisor*—Former FDA Associate Commissioner for Planning and Evaluation; Distinguished Practitioner in Residence and Director, University of Southern California's Washington Center; Senior Consultant Public Service of New Mexico; Controller and Chief Financial Officer, the Englander Company.

Peta-Gaye Bookall, *Research Associate*—Former Intern, Jamaica Social Investment Fund, Jamaica. Fellow, StartingBloc® Institute for Social Innovation. B.A. in Economics, minor in International Relations, Mount Holyoke College.

EquaTerra Staff

Glenn Davidson, *Senior Advisor*—President of EquaTerra Public Sector. Former positions include Chief of Staff to a Governor of the Commonwealth of Virginia; Executive Vice President and Chief Operating Officer of the Computer & Communications Industry Association; Legislative Director to a US Congressman from Ohio; Chief of Strategy and Corporate Development for Accenture HR Services, Senior Vice President of Viatel; Senior Policy and Planning Analyst with the Santa Fe Corporation Independent Consultant. Serves on the Board of Directors of the Christian Children's Fund. Member of the US Department of State's Advisory Committee for International Communications and Information Policy and chairman of its Global Sourcing Subcommittee. Adjunct professor of Journalism at the University of Richmond.

Ron Abel, *Senior Advisor*—EquaTerra, specializing in customer contact services and call center solutions. Former positions include Executive Vice President Telerx, the Horsham, Pennsylvania-based subsidiary of Merck & Co., CPA at KPMG, the international public accounting organization. In addition to being an AICPA member, he participates in the Society of Consumer Affairs Professionals, the International Customer Service Association, and the American Teleservices Association.

INTERVIEWEES AND CONTACTS

FEDERAL

Equal Employment Opportunity Commission
Brett Brenner, Attorney Advisor (Civil Rights)
Aletha L. Brown, Inspector General, Office of Inspector General
Frank Chow, Telecommunications Officer
Ed Elkins, former EEOC manager of National Contact Center
Silvio Fernandez, Operations and Policy Specialist, National Contact Center Team
Laura Hinton, National Outreach Coordinator
Nick Inzeo, Director, Office of Field Programs
Jennifer Kaplan, Program Analyst
Cheryl Mabry-Thomas, Senior Program Analyst, National Contact Center Team
William Morris, Telecommunications Officer
Cynthia Pierre, Director, Field Management Programs
Awo Sarpong-Ansu, Senior Attorney Advisor, National Contact Center Team
John Schmelzer, Director, Field Coordination Programs
Ralph Soto, Supervisor, Field Management Programs,

Equal Employment Opportunity Commission Union Leadership
Gabrielle Martin, National President
Levi Morrow, Chief Negotiator

National Contact Center Leadership
Pat DeWolf, EEOC Site Manager
Elizabeth Thornton, Project Manager

STATE

District of Columbia, Washington Field Office
Dana Hutter, Director
Tram Ngo, Intake Supervisor

Maryland, Baltimore Field Office
Judy Casseal, Enforcement Supervisor
Caroline Glace, Investigator
Monica Jackson, Investigative Support Assistant
Gerald Kiel, Director
Susan Kotrosa, CRTIU Supervisor

New York, New York City Field Office
Nancy Boyd, Deputy Director
Ken Chu, Administrative Judge
Spencer Lewis, Director

North Carolina, Charlotte Field Office
Gloria Barnett, Enforcement Manager
Melinda Caraballo, Investigator
Ruben Daniels, Director
Clarence Manuel, Investigator Support Assistant
Ava Morrow, Investigator
Mark Sims, Administrative Judge (Union Area Manager)
Michael Whitlow, Enforcement Manager

North Carolina, Raleigh Field Office
Tom Colclough, Director
Patricia Miller, Investigator
Yamira Moreno, Investigator
Brigitte Walker, Intake Clerk

Pennsylvania, Pittsburgh Field Office
Joan Gmitter, CTIRU Supervisor

American Federation of Government Employees, AFL-CIO
Regina M. Andrew, President, Local 3614