




U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Washington, D.C. 20507

Office of
Inspector General

June 29, 2006

MEMORANDUM

TO : Cari M. Dominguez
Chair

FROM : Aletha L. Brown 
Inspector General

SUBJECT : Final OIG Report No. 2005-11-AMR
Independent Evaluation of the National Contact Center

The Office of Inspector General (OIG) final report on the above subject matter is attached. The contractor, Job Performance System (JPS) of Alexandria, Virginia, performed the independent evaluation of the National Contact Center (NCC) and wrote the report. The OIG supervised their work requesting that they consider successful call center operations and industry best practices in evaluating EEOC's pilot contact center. The report is intended to inform Agency management, the Commissioners, and stakeholders on the impacts of the NCC pilot on EEOC's operations and customers. By understanding these impacts, readers can understand the NCC's successes, as well as those areas that require improvement.

The JPS Team believes that the NCC has the potential to make a significant contribution to the EEOC; however, as presently operated, it is not effective. The team recommends that the EEOC continue with the NCC, but only if significant changes are made to improve call volume, optimize customer satisfaction and operational efficiencies, measure on-going performance and ensure readiness for the future.

We appreciate your assistance and cooperation in conducting this review, as well as your comments on the draft report issued on April 7, 2006. We also thank the many Headquarters and Field staff who provided input during the evaluation and comments on the draft report. Comments were evaluated by the JPS Team and resulted in some significant changes to the report. All comments are included in their entirety, as Appendix A. JPS's disposition of these comments is listed in Table 1 of the Executive Summary. OIG's disposition of the contractor conflict of interest issue is addressed below.

In their comments on the draft NCC Evaluation report, the Office of Field Programs (OFP), and Katherine Kores, the Memphis District Director, stated that Convergys' participation as a subcontractor in OIG's evaluation of the NCC created a conflict of interest because Convergys is an industry competitor of NCS Pearson, Inc. (Pearson), the NCC operator, and was an unsuccessful bidder on the contract to operate the NCC. Moreover, it was noted that Convergys was in litigation with the EEOC in connection with an Americans with Disabilities Act charge of discrimination, filed by an employee of a Convergys operated contact center, at the time it was

selected and served as a subcontractor for JPS on the evaluation project. Further, OFP implied that Convergys was motivated towards negative report findings because of EEOC's finding of discrimination.

OIG has carefully considered these concerns, as well as the applicable law, regulations, Commission policies, and information provided by other federal agencies relative to this matter. Based on this review, we find that the evidence does not support a conclusion that Convergys' participation in the NCC evaluation project constituted an organizational conflict of interest.

OIG must adhere to professional standards which include ensuring that the organization and each individual working for OIG is free both in fact and appearance from personal, external, and organizational impairments to independence. We believe that OIG took all necessary steps to ensure that the work of Convergys satisfied these standards. These steps included requiring that the entire evaluation meet the President's Council on Integrity and Efficiency's Quality Standards for Inspections. For example, OIG questioned Convergys directly about the potential for conflicts of interest since it would be evaluating an industry competitor before deciding to award the contract to JPS. Convergys also provided substantial evidence that it had sufficient safeguards and firewalls in place to ensure the independence of their work. Another example is that the Contracting Officer's Technical Representative, the Contracting Officer's Representative, and the Contracting Officer closely reviewed the evaluation plan, preliminary findings, and draft reports. These reviews were to ensure that the plans and analyses were accurate and complete. The workpaper review at the completion of the evaluation was designed to ensure that JPS' work was competent, independent, and that the facts gathered, and that the conclusions and recommendations made by JPS were accurate.

With regard to the actions of JPS, it engaged in a thorough vetting process to determine whether Convergys had the requisite knowledge, experience, resources, and independence to perform as a subcontractor on the NCC Evaluation Project. At all stages of the evaluation JPS personnel worked closely with Convergys personnel and provided appropriate oversight. JPS personnel confirmed that the conclusions and recommendations developed by Convergys tied directly to their findings and were consistent with overall JPS Team findings.

The size of the Convergys Corporation, its organizational structure, and the autonomy of Convergys Professional and Consulting Services (the entity that conducted the NCC Evaluation work), support a conclusion that the appropriate firewalls were in place to ensure that it was sufficiently independent from the Customer Management Group, Inc., the organization that bid on the NCC contract and was the respondent employer in the discrimination action. In this connection, Convergys Corporation has approximately 66,000 employees and its annual income is approximately \$2.5 billion. It is comprised of four separate autonomous organizations which include Professional Consulting Services, Customer Management Group, Human Resource Services, and Billing Services. Each organization reports directly to Convergys' Chief Operating Officer. Convergys Professional and Consulting Services is not in any way involved with the work of the Customer Management Group, and in fact, has conducted evaluations of programs run by the Customer Management Group for the United States Postal Services, among other organizations.

Regarding OIG's review of regulations related to this matter, the Federal Acquisition Regulations (FAR), 48 C.F.R. §9.502 defines organizational conflict as follows:

(c) An organizational conflict of interest may result when factors create an actual or potential conflict of interest on an instant contract, or when the nature of the work to be performed on the instant contract creates an actual or potential conflict of interest on a future acquisition.

Organizational conflicts of interest are generally grouped into three categories. The first group deals with situations in which a firm has set the ground rules to some degree for another government contract. The second situation occurs where a firm has access to proprietary information as part of performing a government contract that may provide a competitive advantage for future government contracts unless restrictions are imposed. The third scenario occurs in situations in which a government contract could entail a firm evaluating itself or a competitor **without proper safeguards**, either by assessing performance under another contract or, by evaluating proposals for the contract at issue. See 48 C.F.R. §9.505-3 (2006). The Federal Acquisition Regulations do not prohibit firms from evaluating their own contract work or the work of competitors, but rather requires that proper safeguards be in place. Federal courts have held that the responsibility for determining whether an actual conflict of interest will arise, and to what extent the firm should be excluded from the competition, rests with the contracting entity, which in this case is the OIG. The courts are extremely reluctant to overturn the decision of the contracting entity and will only set aside decisions that are arbitrary and capricious, an abuse of discretion or otherwise not in accordance with law. Further, we believe that OIG took the necessary steps to mitigate any perceived organizational conflict.

Another key fact that demonstrates that there were no impairments to independence is that Pearson, the operator of the NCC, and Convergys executed a non-disclosure agreement in October 2005, preventing Convergys from using information obtained in the evaluation for a competitive purpose. Subsequent to execution, Pearson never expressed any concerns to OIG about Convergys' role as a subcontractor on this evaluation. Convergys' staff inspected the Pearson facility, interviewed their staff and managers, monitored customer calls, and learned details about their operations, including the technology that Pearson uses. For an industry competitor to be satisfied with this arrangement demonstrates no real or perceived conflict of interest existed on the basis of industry competition. If an actual or apparent conflict existed it is highly probable that Pearson would have protested Convergys' continued involvement. The simple truth is that they did not.

With regard to OFP's assertion that Convergys should not have been utilized as a subcontractor because the Commission had initiated litigation against the company, OIG finds that this assertion is without merit, as well. It is crucial to note that nothing in the FAR prevents an agency from entering into a contract with a company that it is in litigation with in connection with an unrelated matter. There are no written EEOC policies or documented practices that prevent, or advise against, subcontracting with an entity involved in pending litigation with the Commission. Finally, OIG was notified of the Agency's litigation case on December 9, 2005, three months after the contract with JPS was signed. Upon learning of the litigation, OIG immediately notified the JPS Team leader who ensured that Convergys' staff would not visit

locations where the discrimination occurred. Convergys' staff visited the Dallas and Cincinnati EEOC offices.

OIG consulted with Marilyn Glynn, the General Counsel of the Office of Government Ethics (OGE), and staff on this matter. OGE's view was that the circumstances surrounding this matter did not support a conclusion that an organizational conflict of interest had occurred simply because Convergys was in litigation with the Agency. They stated that OFP's inference that Convergys should have been disqualified, as a subcontractor, because it was in litigation with the Commission on an unrelated matter was neither a prudent or logical position for an agency to take. OGE noted that if being in litigation with an agency is considered a basis for automatic disqualification, it seems as if the debarment procedures would be circumvented. Blanket disqualification based upon a company's litigation, would be tantamount to a *de facto* debarment. They found that such an action would be especially unnecessary under these circumstances since the case, in which the Commission prevailed, involved one employee, a modest monetary award of \$114,000.00, and no evidence that Convergys had a reputation as a notorious violator of antidiscrimination laws. It is significant to note that OFP's assertion that the litigation created a conflict of interest is further undermined by the fact that the Convergys personnel conducting the NCC evaluation were not aware of the litigation until they were advised by JPS in December 2005, and there was no reason they should have known. In the context of the Convergys operation, the EEOC litigation resulted in an insignificant monetary award which involved a totally separate organization.

Finally, with regard to the notion that the conflict of interest issues should have been addressed in the body of the draft report, we find that since the arguments were unsubstantiated and devoid of merit, there was no need to give them the unwarranted credence of discussion within the body of the report.

In closing, OIG will forego its standard practice of holding an Exit Conference to allow appropriate time to review the attached report, in advance of the scheduled July 12, 2006 Commission meeting. As the Commission prepares to decide how to handle NCC contract matters, OIG is available for briefings upon request. We are requesting that the report be made available on the public EEOC website, www.eeoc.gov.

If you have any questions, please contact me or Larkin Jennings, Evaluator, who served as the Contracting Officer's Technical Representative, at extension 4391 or larkin.jennings@eeoc.gov.

c: Leonora Guarraia
Vice Chair Earp
Commissioner Silverman
Commissioner Griffin
Commission Ishimaru
EEOC Senior Staff
District Directors
Gabrielle Martin



June 29, 2006

Ms. Aletha Brown
Inspector General
Equal Employment Opportunity Commission
1801 L Street, N.W.
Suite 3001
Washington, D.C. 20507

Dear Ms. Brown:

Pursuant to Contract No. GS10F0325K with Office of Inspector General, enclosed is our report "The EEOC's National Contact Center: An Evaluation of its Impacts." The purpose of the report was to evaluate the following:

- NCC implementation and operations
- NCC impact on Headquarters operations and staff
- NCC impact on field operations and staff
- NCC impact on EEOC customers

In conducting our work, we followed the Quality Standards for Inspections dated January 2005, issued by the President's Council on Integrity and Efficiency and Executive Council on Integrity and Efficiency.

We found that the NCC has had some positive impact on field operations and staff, and we identified areas for improvement, including sending more calls to the NCC and integrating the EEOC and NCC work and technologies. We recommend that the EEOC renew the Pearson contract, but only if significant changes are made to operations at the NCC and EEOC.

If you have any questions, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lee Ann D. Wadsworth'. The signature is fluid and cursive, with a large initial 'L' and 'W'.

Lee Ann D. Wadsworth, Ph.D.
Consultant

Enclosure



The EEOC's National Contact Center: An Evaluation of its Impacts

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For
Office of Inspector General
U. S. Equal Employment Opportunity Commission

June 29, 2006

EXECUTIVE SUMMARY

Background

In September 2004, the Equal Employment Opportunity Commission (EEOC) contracted with NCS Pearson, Inc. (Pearson) to develop, implement, and operate a National Contact Center (NCC) to upgrade customer service, improve human capital effectiveness, and deliver accurate and consistent service to its customers. This contract was created as a two-year pilot project, with an option to extend for three additional years. In February 2005, the NCC commenced initial operations with seven field offices. On March 21, 2005, the NCC started accepting all calls on the EEOC's general inquiry lines, which include two national toll-free lines serving both voice and Text Telephone (TTY) calls.

In September 2005, the Office of Inspector General (OIG) of the EEOC contracted with Job Performance Systems, Inc. (JPS) to evaluate the NCC's impact on EEOC staff, operations, and customers. The purpose of this evaluation was to provide EEOC management with information that would aid in deciding whether to exercise the option to extend the Pearson Contract.

Since the NCC's purpose is to improve efficiency in field offices and enhance customer service, the JPS team focused on the following topics in the evaluation:

- NCC implementation and operations
- NCC impact on Headquarters operations and staff
- NCC impact on field operations and staff
- NCC impact on EEOC customers

Context for the Evaluation

The EEOC planned the NCC's pilot year of operations as the time to develop, test, and refine standard operating procedures (SOP) and business rules; develop and refine scripts; and develop an effective working relationship between the EEOC and NCC. To allow time for this development process, the EEOC limited the number of calls directed to the NCC in the initial months to only those received on the two toll-free general inquiry lines, and then later phased in additional unsolicited calls from field offices. The EEOC and NCC have continued to implement modifications to initial systems and procedures throughout the first year of NCC operations.

Approach

The JPS Team conducted fieldwork from October 2005 through February 2006, during which the NCC was still in its first year of operations. The team utilized baseline data to evaluate the NCC's impact on EEOC operations and staff; unfortunately, some baseline data had been destroyed and other data either had major data entry errors or were confounded by other factors¹

¹ The separate effects of the variables cannot be isolated.

such as attrition² and changes in EEOC office intake procedures. As a result, the team relied primarily on interviews, focus groups, and surveys in conducting this assessment.

The JPS team reviewed background documents and conducted interviews at EEOC Headquarters, seven field offices, and the NCC. The team also facilitated focus groups at several field offices and the NCC and administered surveys to field personnel.

Team members documented the NCC's work processes and the technology used to support them. The team also reviewed a variety of metrics, including call volume and call duration. In addition, the team conducted remote call monitoring and side-by-side observations of Customer Service Representatives (CSR) and reviewed training, feedback, and other support provided to CSRs.

Findings and Conclusions

Implementation of the NCC

The NCC has implemented the recommendations contained in the Assessment of a National Contact Center Solution for EEOC (2003 Assessment Report). As a result, the NCC is now the EEOC's central point of contact. Unsolicited calls to the EEOC's two general information toll-free numbers, originally routed to field offices, are now immediately answered at the NCC. By implementing the NCC, the EEOC moves one-step closer to meeting E-Government expectations.

Comparison of Estimated NCC Call Processing Statistics with Actual Statistics

The EEOC has implemented the recommendations in the 2003 Assessment Report, and Pearson has met most of the contractual performance measures, but the NCC is not receiving the call volume projected in the 2003 Assessment Report, in part due to the business decision to limit initial calls to the NCC during the pilot phase of operations.

During the first year of operations, the CSRs handled 269,693 calls, far lower than the 1.2 million calls projected by the 2003 Assessment Report. The JPS Team estimates that the NCC presently saves the EEOC approximately 13,964 field staff hours, or the equivalent of 6.71 Full Time Equivalent (FTE) employees. Before the decision to limit call volume, the 2003 Assessment Report projected that the NCC would save 43,224 field staff hours, the equivalent of 21 FTEs. Headquarters is planning to launch a major advertising campaign by July 2006 to increase awareness of the toll-free 800 number and, therefore, call volume.

Impact of the NCC on Headquarters Operations

The NCC had minimal impact on operations at Headquarters. There appears to have been a decrease in controlled correspondence and an increase in other communications such as web hits, which could be partially attributable to the NCC; however, there are no data to support this possibility. Charge receipts for the 2005 fiscal year are down when compared to previous years,

² Investigators and other staff that have left EEOC offices.

but this appears to be part of a normal cycle. Further, the overall pattern of monthly charge receipts since inception of the NCC is generally consistent with previous years. The EEOC never anticipated that the NCC would have a significant, direct impact on Headquarters.

Impact of the NCC on Field Operations

Employees indicate that they have experienced some reduction in call volume. Data from two offices maintaining call data indicate that, when comparing calls pre- and post-NCC, one office has received more calls post-NCC, while the other has received fewer calls. Offices are beginning to redirect callers to the NCC after business hours; however, the number of calls that CSRs are handling has not significantly increased.

Impact of the NCC on Field Staff

Some offices have experienced savings in Investigator and/or support staff time because of the NCC, but many Investigators commented that the forms they receive from the NCC often contain inaccuracies and incomplete information. Many offices tend to use only a portion of the information provided, causing duplication and in some cases, more work.

Managers and employees understand the NCC's purpose; however, they expected that the NCC would lighten workload for field offices far more than it actually has.

Integration of the EEOC and NCC

Communication between the NCC and EEOC offices is not efficient. There is not an established process to communicate feedback and share knowledge and information. Employees at the NCC also do not share a common understanding of their role or the work of the EEOC, which limits their effectiveness in supporting the EEOC. The technologies across the EEOC and NCC are not well integrated, preventing a seamless operation and causing duplication of work at EEOC offices and the NCC. The NCC also does not provide regular trend reports to the EEOC.

Impact of the NCC on EEOC Customers

Both the EEOC offices and the NCC are serving customers. The EEOC offices appear to continue to provide timely customer service for walk-ins and first-time customers calling on the telephone.

The EEOC recently collected customer satisfaction ratings on the NCC, which found the NCC rated above average compared to other Federal agencies and service industries in the private sector; still, operations at the NCC can be improved. CSRs handle calls on a consistent basis, but need more training in soft skills³ and accurately and consistently handling unique inquiries. In addition, metrics assessing CSRs are manually gathered and the ratings are subjective.

³ Soft skills relate to how CSRs handle transactions, e.g. professionalism in the way they handle the transaction, controlling the call flow, taking ownership of the call, and being empathetic with the caller. Hard skills relate to the product, in this case understanding and knowledge of EEOC laws.

Recommendations

The JPS Team believes that the NCC has the potential to make a significant contribution to the EEOC; however, as presently operated, it is not effective. The team recommends that the EEOC continue with the NCC, but only if significant changes are made to improve call volume, optimize customer satisfaction and operational efficiencies, measure on-going performance, and ensure readiness for the future.

Following are recommendations to improve the NCC and its impact on the EEOC.

Recommendations to Improve Operations Quickly

1. Increase call volume by increasing customer awareness and routing all initial calls through the NCC. One of the main reasons the NCC is having a lower impact on the EEOC than expected is lower call volume. The JPS Team recommends that the EEOC route all unsolicited calls to the NCC; fewer calls to offices should reduce workload. Implementation of the current campaign to publicize the NCC will increase public awareness of the NCC and also increase call volume.
2. Increase the number of calls that are resolved at the NCC and not forwarded to EEOC offices by clearly defining the NCC's role. The NCC and EEOC should better define their respective roles and responsibilities as they relate to the intake process. At a high level, the NCC should act as the primary customer contact until an Investigator is assigned to the case. Once an Investigator is assigned, the EEOC should be the primary contact.
3. Improve the number of non-charge related calls resolved at the NCC by integrating processes and technology across the EEOC and NCC. The two organizations should use the same or integrated technologies to capture and maintain customer information. This would promote communication between the two organizations and enable a better, seamless customer experience. The JPS Team also recommends establishing a process for EEOC and NCC staff to communicate directly with one another, allowing staff to share knowledge and information and providing a vehicle to regularly ask questions and provide feedback. This recommendation has the potential to increase efficiency and reduce duplication of work.

Recommendations to Optimize Customer Satisfaction and Operational Efficiencies

4. The EEOC should institute significant changes to the operating model. Standardizing the citizen contact process across the EEOC and NCC will aid in the development of a single intake process flow that begins with initial contact at the NCC and moves on to the EEOC after meeting certain criteria. The EEOC should pilot this process with a few different types of offices to identify and close potential process gaps prior to implementation across the NCC and EEOC offices.

To investigate, evaluate, and implement this and other recommendations, the EEOC should also establish an “EEOC/NCC Steering Committee” with representation from all stakeholders, including managers and Union employees in the field, at Headquarters, and at the NCC. The purpose is to establish procedures that integrate the EEOC and NCC and maximize operational effectiveness across the two organizations, increasing end-to-end customer satisfaction.

5. Provide training and feedback to CSRs on technical and soft skills and improve the quality of information sent to EEOC offices. CSRs should receive training on soft skills, call handling processes, and the laws enforced by the EEOC. The JPS Team also recommends that CSRs receive training to improve the quality and quantity of information provided. The team also recommends that the NCC provide regular feedback and mentoring to its CSRs to maintain high-quality skills.
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. The JPS Team also recommends implementation of a search engine that reliably and quickly identifies scripts for the CSRs to follow, as well as a significant reduction in the required number of scripts.

Recommendations to Measure On-going Performance and Optimize Readiness for the Future

7. Create and implement reporting processes to identify trends proactively. With proper set-up, reports from the NCC could serve as an important avenue for the EEOC to continually improve processes and identify new ways to serve citizens.
8. Create and implement a process to regularly monitor and measure customer satisfaction. This will ensure continuing effectiveness in serving the public.
9. Establish metrics to measure the NCC’s future impact on EEOC operations, staff, and customers. It is currently difficult to identify reliable metrics to evaluate the NCC’s impact. In order to develop the metrics, the Steering Committee should be responsible for enumerating important goals related to the NCC. Examples of areas to consider include customer service, operations, and business processes. Metrics can be developed once the EEOC has identified goals in the form of desired outcomes.
10. The EEOC should implement change management procedures. This involves articulating the vision for NCC, the business proposition and urgency of implementation, as well as removing obstacles. Change management also includes establishing methods to communicate the EEOC and NCC roles to managers and staff and to celebrate and build on short-term wins. Both organizations should provide training on operational procedures. Employees need to be involved in improving the process to become vested in the NCC.

Comments to the Draft Report

The JPS Team received comments on the draft report from EEOC's Office of the Chair; Office of Field Programs (OFP); Office of Research, Information, and Planning (ORIP); Office of Communications and Legislative Affairs (OCLA); Office of the Executive Secretariat (Exec. Sec.); Office of Legal Counsel (OLC); and the New York, Memphis, and Charlotte District Offices. Comments also came from the National Council of EEOC Locals No. 216, American Federation of Government Employees, AFL/CIO (Union). The comments helped clarify any data discrepancies and captured the Agency's explanation for any other areas of concern. In some instances, information presented was more recent than was available during data collection. Upon verification and further analysis and/or review, the team made appropriate changes to the report.

Major topics addressed in the comments include evaluation methodology, concern about over-reliance on qualitative data, and failure to perform a cost-benefit analysis. Table 1 summarizes the source of major comments received on the draft report, their content, their disposition, and the section in the report where the comments are addressed. Appendix A contains the comments received from each office in their entirety.

Table 1. Draft Report Source, Content, and Disposition

EEOC Source	Content	Disposition	Reference
OFP, ORIP	Methodology failed to include major EEOC sources of data	The sources, e.g., the 2003 NCC Assessment Report, were not included in the methodology because the 2003 Assessment Report's analysis methodology was not useful for purposes of this evaluation.	IIA1
Office of the Chair, OFP, ORIP	Over-reliance on qualitative data	Analysis of qualitative data unchanged. Such data are useful in assessing impact, especially when quantitative data are not available and/or unreliable; added data on telephone calls for two offices, EASQs and GroupWise emails.	IIA1, IIA2, IID1, IID2, IIE1, IIE3,
ORIP, Union	No cost-benefit analysis performed	There was no business case for the NCC and therefore a cost-benefit analysis was not useful or practical. However, a comparison of the annual cost of a full time equivalent employment (FTE) for an Investigator to total cost is included.	IIIH
Office of the Chair, OLC, OFP, NYDO, Memphis DO	Considering the NCC is in a pilot stage, performance and impact of NCC not placed in proper context	Additional language included to highlight perspective.	I
Office of the Chair, OFP, ORIP	Over-reliance on responses to EEOC employee survey	The absence of reliable baseline data required alternative data collection efforts; added data on telephone calls for two offices, EASQs and GroupWise emails.	IIA1, IIA2, IID1, IID2, IIE1, IIE3,

EEOC Source	Content	Disposition	Reference
Office of the Chair, OFP, Memphis District Office	Customer service improvements not given adequate consideration	Analysis of the overall score (including voice, e-mail, and web) provided.	IIIG8
OFP	Inadequate support for some findings and conclusions	Additional support and explanations provided as appropriate.	III
OFP, Memphis DO	Subcontractor to JPS has a conflict of interest	No conflict of interest found.	IG Transmittal Letter
OFP, ORIP, OCLA, EXEC. SEC	Attribute decrease in controlled correspondence and improved investigation merit factors to NCC	Additional information provided, but it did not affect the analysis and results.	IIIC1

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List of Acronyms

AHT	Average Handle Time
ASCI	American Customer Satisfaction Index
CMS	CMS-Medicare
CP	Charging Party
CSR	Customer Service Representative
CRM	Customer Relationship Management
EAS	EEOC Assessment System
EASQ	EEOC Assessment System Questionnaire
EEOC	Equal Employment Opportunity Commission
EST	Eastern Standard Time
FAQ	Frequently Asked Questions
FCIC	Federal Citizen Information Center
FTC	Federal Trade Commission
FTE	Full Time Equivalent Employee
GAO	U. S. Government Accountability Office
GSA	U. S. General Services Administration
IMS	Integrated Mission System
ISA	Investigator Support Assistant
IVR	Interactive Voice Response
JPS	Job Performance Systems, Inc.
NAPA	National Academy of Public Administration
NCC	National Contact Center
OAA	Office Automation Assistant
OCLA	Office of Communications and Legislative Affairs
OFF	Office of Field Programs
OIG	Office of Inspector General
OIT	Office of Information Technology
ORIP	Office of Research, Information, and Planning
PCP	Potential Charging Party
SOL	Statute of Limitations
SOP	Standard Operating Procedures
TTY	Text Telephone

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I. INTRODUCTION

Background

The Equal Employment Opportunity Commission (EEOC) established a National Contact Center (NCC) to accomplish three objectives: upgrade its customer service based on 21st Century technology, improve human capital effectiveness, and deliver accurate and consistent service to its customers. In February 2003, the National Academy of Public Administration (NAPA) submitted a report recommending, among other things, that the EEOC establish a national call center. In June 2003, an internal EEOC work group completed a review of how the EEOC handles calls and issued a report that recommended implementation of a contact center - the Assessment of a National Contact Center Solution for EEOC (2003 Assessment Report).

2003 Assessment Report Conclusions and Proposed Solution. The 2003 Assessment Report concluded that implementing a contact center would be instrumental in resolving concerns about system capacity to effectively handle unsolicited calls and in ensuring consistent and accurate customer service across all EEOC offices. A contact center was seen as an option that would benefit all EEOC offices rather than hiring staff, which would benefit only a few offices. In addition, a contact center addresses requirements in the President's Management Agenda and the E-Government Act of 2002.

NCC Contract. In September 2004, the EEOC contracted with NCS Pearson, Inc. (Pearson) to develop, implement, and operate the NCC as a two-year pilot project, with an option to extend the term for three additional years.⁴ Contractually, the Commission can obligate funds only one year at a time. The EEOC can exercise this option by giving Pearson 60 days' advance written notice of its intention to renew the contract, and then written notice of renewal within 30 days prior to expiration. The total term of the contract, including the pilot and option, is not to exceed 60 months.

The NCC implemented a program to provide the following new services:

- Capability for the public to communicate on first contact in more than 150 languages, increasing meaningful access to people with limited English proficiency
- Twelve hours of operation – 8 a.m. to 8 p.m. Eastern Standard Time (EST), longer than business hours for EEOC field offices
- A live person should answer calls within 30 seconds
- FAQs on the EEOC's website
- An Interactive Voice Response (IVR) system accessible to all callers 24 hours per day, 365 days per year
- Text Telephone (TTY) service attended by trained staff available 12 hours a day

⁴ The contract provides for three one-year options, which may be exercised annually, or the Commission can vote to extend the contract for three years; however, because the EEOC only has one year funding, contractually the option exercises are limited to one year at a time.

- Email access that does not require knowing the name or email address of a specific EEOC employee

Contract to Evaluate the NCC. In November 2003, the EEOC Commission unanimously approved implementation of a two-year pilot phase of the NCC, to include an independent audit of the NCC prior to committing to a multi-year contract. After discussions between the Inspector General and other senior executives, the EEOC transferred to the Office of Inspector General (OIG) the funding to evaluate the NCC. OIG then conducted research, formed a project team, obtained input from Agency officials and selected stakeholders, developed a statement of work, and held a competition to award the contract. In September 2005, the OIG contracted with Job Performance Systems, Inc. (JPS) to evaluate the impact of the NCC on the EEOC's staff, operations, and customers. JPS and its subcontractor Convergys conducted its evaluation from October 2005 through April 2006. The purpose of the evaluation was to provide EEOC management with information to aid in a decision on whether to exercise the option to renew the Pearson contract and inform stakeholders on how the NCC has affected the EEOC and its customers.

Since the purpose of the NCC is to improve efficiency in field offices and enhance customer service, the JPS evaluation focused upon the following topics:

- NCC implementation and operations
- NCC impact on efficiency and effectiveness of EEOC operations
- NCC impact on field staff
- NCC impact on EEOC customers

The EEOC expected the NCC to have a significant effect on customers and field offices, with a minimal impact on Headquarters; therefore, the JPS Team placed more emphasis on the NCC and its impact on field offices than the impact on Headquarters activities.

Context for the Evaluation

The 2003 Assessment Report recommended that there be at least a two-year pilot phase of operations. The first year (September 2004-2005) was to be dedicated to start-up operations, including the following:

- Developing accurate baseline data on the volume and nature of calls
- Developing and refining scripts based on actual requests for information and their frequency
- Developing and refining standard operating procedures and business rules
- Developing effective working relationships between the NCC and EEOC offices in the field

The second year (September 2005-2006) was to be the time to assess vendor performance. To meet the required notices to renew the Pearson contract in September 2006, the evaluation started seven months after officially launching the NCC (March 21, 2005). This meant that the

JPS Team evaluated the impact of the NCC on EEOC Headquarters and field operations while the NCC was still in its first year of actual operations and the new processes were still being implemented and refined.⁵ Thus, to some degree, the evaluation was of a new program while it was still in the development phase and operations were not yet stabilized. To allow time to stabilize operations before a high call volume, the EEOC initially decided to have only the calls to the two toll-free numbers directed to the NCC rather than all unsolicited calls to field offices. Then from November 2005 through March 2006 the Office of Field Programs (OFP) gradually authorized all offices to redirect their unsolicited calls to the NCC.

The NCC commenced initial pilot operations with seven field offices in February 2005. On March 21, 2005, the NCC started accepting all calls on the EEOC's general inquiry lines, which includes two national toll-free lines serving voice and TTY calls. The EEOC has not yet phased in the option to have the NCC respond to requests for all EEOC publications.

Throughout the NCC pilot, OFP has made operational changes. In December 2005, they increased the time employees in the field have to respond to NCC requests from two to four days. They have also shifted responsibility for hot line calls (callers at risk of losing their rights to file a charge) from all district offices to four offices (three hours per day for each office) in different time zones across the country. In addition, the EEOC has revised scripts to include new information, and made them easier for the Customer Service Representatives (CSRs) to understand and use. After receiving results of the customer satisfaction survey, the EEOC added a closing line to emails and web inquiries advising customers to contact the NCC with any additional questions and providing the TTY number. Further, the EEOC is planning a nationwide outreach campaign in July 2006 to encourage use of the toll-free telephone numbers. The EEOC has not yet required that the NCC fulfill requests for publications or answer calls for any offices in Headquarters.

In addition, the EEOC and NCC have been pilot testing the EEOC Assessment System (EAS). Once tested, the EAS will become a web-based e-government application to help on-line users determine whether the EEOC is the appropriate agency to provide assistance. The NCC is using the EAS and the related EEOC Assessment Questionnaire (EASQ) to help filter out non-jurisdictional inquiries and, when appropriate, electronically submit basic information about the inquiry to the proper EEOC office.⁶ During the NCC pilot, changes have been made to the EASQ, most notably providing look-up tables based on post office data to derive the county code and thus ensure questionnaires are directed to the proper EEOC office.

The amount of time it takes to launch a program at a new contact center varies by the type and size of the program. The EEOC contact center operation is considered small compared to industry standards. Similar programs may take from six to nine weeks to launch and standardize; however, this pilot is more complex because of the work required to streamline processes between the NCC and the EEOC offices. Since all EEOC field offices follow different processes, it is difficult to estimate the time it would take to streamline such activities.

⁵ Field work was conducted from October 2005 through February 2006.

⁶ The EASQ provides basic information (who, what, when where and why an action is discriminatory), which is then used by the investigator to prepare for the follow-up interview.

II. METHODOLOGY

A. EEOC HEADQUARTERS AND FIELD LOCATIONS

The scope of the JPS Team's work included evaluating the impact of the NCC on operations at Headquarters and in the field; however, the EEOC never anticipated that the NCC would have a significant, direct impact on Headquarters. Therefore, the team devoted most of its resources to determining the impact of the NCC on offices in the field.

1. The Search for Baseline Data and a Control Group

Traditional evaluations often rely upon a combination of quantitative and qualitative data. One strategy to assess the NCC's impact is to compare changes in variables of interest before and after program implementation. The JPS Team searched for pre-NCC baseline data to evaluate empirically the impact of the NCC on EEOC operations; however, there were only limited quantitative data available, partially because offices follow different intake procedures, which made it impossible to isolate the impact of variables related to NCC activities. This led the JPS Team to draw many findings and conclusions from subject matter experts. The team gathered this information through interviews, focus groups, and survey data. Where possible, the team compared data collected from different sources to ensure consistent findings.

The JPS Team was unable to identify any pre-NCC data on costs related to handling inquiries, so it was not possible to compare pre- to post-NCC costs. However, the team did provide an analysis of the current estimated impact on an Investigator Full-Time Equivalent (FTE), and projected possible future impact on Investigator FTE based upon certain assumptions.

Telephone Calls. To investigate whether the JPS Team could compare telephone call data for offices pre- and post-NCC implementation, the team explored the possibility that field offices may have been using their telephone systems to automatically track calls to their offices. There is presently no systematic process in place to collect data on the number of calls made to EEOC offices. As a result, there is no automated way to track the number of calls to all or many individual offices pre- and/or post-NCC. The JPS Team did identify that two offices have tracked telephone calls on their public number since October 2004 (pre-NCC). The team evaluated the impact of the NCC on the telephone calls to those offices.

The JPS Team investigated the possibility of replicating the telephone survey conducted as part of the 2003 Assessment Report in order to compare pre- and post-NCC data.⁷ As part of this effort, the team inquired with members of various offices at Headquarters and determined that the field office-level electronic and raw data used to develop the conclusions and recommendations in the 2003 Assessment Report no longer exist. These data included volume and types of telephone calls as well as staff time required to answer calls to offices in the field. The team considered repeating the data collection effort for randomly selected offices to

⁷ Conducting a telephone survey was not in the team's original scope of work; however, upon learning about the telephone survey, the team considered replicating the survey on a smaller scale.

determine what changes have transpired.⁸ This strategy would have been efficient and practical to compare data across a sample of offices given the available time and resources, but the EEOC and JPS Team could not find the raw telephone data collected in 2003. The team made searches at Headquarters, at field sites, and with the data entry vendor. With no office-level baseline data, it was impractical to replicate this study for selected offices.⁹

Lacking historical data across offices, the team included some items in the electronic survey sent to all employees located in the field, asking them to estimate the average number of calls they received pre- and post-NCC implementation. The drawback is that these data are only as reliable as the survey respondents' memory.

Productivity Measures. The JPS Team also investigated evaluating traditional performance metrics such as productivity, merit factor, and cause rate, but these data were not good measures to use in the evaluation because of confounds¹⁰ over the past several years that have affected many offices. For example, many offices have experienced attrition (staff have left and not been replaced) and/or undertaken changes in intake procedures.

The JPS Team specifically evaluated merit factor pre- and post-NCC, as it has long been an important EEOC measure of positive resolutions, cause finding, withdrawals, mediations, and conciliations. To use merit factor as a relevant measure, one must assume that all of the following occur: the NCC frees up Investigator time; Investigators spend that time conducting more thorough and higher quality investigations; and those investigations lead to increased benefits. OFP indicated that merit factor is relevant given the current environment, in which Investigators are managing a heavy workload. The team evaluated the trend of discrete quarterly merit factor for all 51 offices from October 1, 2003 through December 31, 2005.¹¹ For the same period, the team also evaluated the merit factor for only those offices indicating that the NCC had enabled them to redirect Investigator resources to spending more time on investigations.

The JPS Team could not identify any change in the merit factor other than a trend toward a very small increase across time. It is possible that, because the analysis included only nine months of NCC operations, there has not been sufficient time to realize an impact on merit factor.

Integrated Mission System (IMS) Data. The JPS Team initially considered a comparison between inquiries generated from the NCC and those from all other sources reported in the IMS. The team considered this as a means to measure the NCC's impact on increasing EEOC efficiency, but the team later identified major data input errors on one of the critical variables, finding a wide range of differences between the percent of EASQs received from the NCC and the number entered into the IMS. Percentages of EASQs entered into the IMS ranged from 1 percent (2 entries in the IMS with an EAS/NCC source coding compared to 249 EASQ sent by

⁸ In order to do this we required historical office level data.

⁹ Even if the team could have located the data, given the deadline for the report draft, the team would have had to replicate the telephone survey in December 2005 or January 2006, which would have introduced confounds related to collecting data in dissimilar months (e.g. vacations/holidays in December and January).

¹⁰ Variables that obscure or make it impossible to identify and interpret the effect of the NCC on EEOC field office operations.

¹¹ Because of the repositioning, equivalent data for the period January 1-March 31, 2006 were not available.

the NCC) to 754% (1666 entries in the IMS with an EAS/NCC source coding compared to 221 actual EASQs sent by the NCC).

The team found that different offices enter EASQ information into the IMS at different times during the intake process; some immediately enter the information upon receiving it from the NCC, while others enter it after they mail their office intake questionnaire and receive it from the PCP. These differences introduce confounding factors that will affect any analysis comparing offices.

Close examination of one office showed that 19.5 percent (28 of 143) of the EASQs sent by the NCC were entered into the IMS in error (2 were duplicate entries and the remaining 26 indicated that the EASQ originated from a non-NCC source). This finding indicated that any further analyses of these data would be unreliable and therefore invalid, so the team stopped at this point.

Due to the coding errors identified above, the JPS Team did not use any IMS data related to the coding of inquiries and charges, but the team did use IMS data to evaluate accuracy and completeness of EASQs sent to EEOC offices.

Treatment/Control Groups. The JPS Team also explored whether it could identify some offices as control groups. This was only an appropriate strategy if other important confounding factors could be held constant so that the treatment (in this case implementation of the NCC, or even implementation of redirecting telephone calls to the NCC) and control groups were similar. This procedure would help to isolate and quantify the treatment effect; therefore, it would be important to put “like” offices in the treatment and control groups and try to hold other confounding factors (such as turnover) constant across the treatment and control groups.

Using treatment and control groups proved impossible due to the manner in which the EEOC rolled the NCC out. The EEOC initially set up seven offices to pilot the NCC for one month, and then commenced implementation across all remaining offices on March 21, 2005. This one-month initial pilot did not give sufficient time to stabilize operations and measure the NCC’s impact. Then, beginning November 29, 2005, the EEOC gradually authorized (but did not require) offices to change their telephone voice message to redirect all first time callers to the NCC.¹² This initiative started with eight local offices and has since gradually expanded to include all offices. In both instances, there was no effort to create treatment and control groups and, as a result, there are no comparative groups to evaluate impact.

2. Document Review

The JPS Team began this project by reviewing background documents related to the EEOC’s decision to implement the NCC. This review included the initial study conducted by NAPA that recommended a contact center. The team also reviewed the 2003 Assessment Report and the transcripts of the Commissioners’ meeting reviewing those findings. The team also reviewed the

¹² OFP authorized and encouraged but did not require offices to redirect unsolicited calls to the NCC. Whether and the extent to which offices implemented this change was left to the discretion of each individual office.

Pearson Contract as well as documents related to the field-repositioning plan and other documents related to operations. A list of key documents is provided in Appendix B.

3. Data Analysis

For three offices (two district and one area office), the JPS Team compared information in the EASQs with data in the IMS for the period April 1, 2005 through March 31, 2006 to evaluate accuracy and completeness of the EASQs. The team also analyzed NCC-related GroupWise emails for one district office for the period January 1, 2006 through March 31, 2006.

Headquarters Interviews

The JPS Team interviewed the Chair, 3 Commissioners,¹³ 17 additional officials and staff in Headquarters, and the President of the Union. The team conducted nearly all interviews in person; a few were conducted by telephone. The team performed most interviews during the weeks of October 31, November 7, and 14, 2005, with the intention of collecting employees' impressions of the NCC's impact on Headquarters and field operations. The team also wanted to identify areas to pursue when conducting visits to field offices.

The interviews generally took from 60 to 90 minutes to complete. The team began most interviews by describing the team's project responsibilities and asking the interviewees to provide a brief description of their job. Then, depending upon their role, the team asked a series of prepared questions. Most of the questions related to their expectations of the NCC and its impact. The Interview Protocol is attached as Appendix C.

In addition to these formal interviews, the team met several times throughout the evaluation, on a less formal basis, with certain employees in the OFP to obtain information on field operations, relevant statistics, and other issues related to the Pearson Contract and operations.

4. Field Site Visits

The JPS Team visited seven offices in the field, including five district offices (New York, Charlotte, St. Louis, Dallas, and Los Angeles) and two area offices (Raleigh and Cincinnati). The visits took place during the weeks of December 5 and 12, 2005. The criteria the team used to select offices included geographic and size diversity; offices that the team understood to be positive, neutral, or negative toward the NCC; and offices with different levels of performance. The team also desired an office that provided a representative on the technical evaluation panel that generated the 2003 Assessment Report.

Due to the number of criteria and budget and time limitations, the selected seven offices generally addressed the criteria, but not all offices met all criteria; for example, the visits included district and area offices, but no local offices, mostly because they have only a few professionals, limiting the team's ability to collect meaningful data. A description of the procedures followed during these visits is provided in Appendix D.

¹³ One of the five commissioner positions was vacant at the time the team conducted its interviews.

Surveys

The JPS Team conducted two surveys; one was sent to Office Directors, and the other, an electronic survey, was sent to everyone in the field. The team developed these questions based upon document reviews, interviews at Headquarters, and visits to the seven field sites as well as the NCC (described next). Descriptions of the Office Director Survey and the Electronic Survey are provided in Appendix D. The Director Survey is provided in Appendix E and the Electronic Survey to all field staff and responses are provided in Appendix F.¹⁴

B. NCC EVALUATION

1. Document Review and Headquarters Interviews

JPS team members began this effort by reviewing many of the documents described earlier in this report.¹⁵

2. NCC Site Management Interviews

The JPS Team conducted interviews with the NCC Site Director and management team prior to its visit to the NCC. The purpose of these interviews was to gain an initial understanding of NCC operations, clarify the manner in which the NCC and EEOC communicated, and identify important areas to assess during the site visit.

The interviews took from 60 to 75 minutes. The team began by describing its project responsibilities, and then asked respondents to provide a brief description of their day-to-day responsibilities. The team followed up with questions regarding the NCC's organization and operations. The Interview Protocol is attached as Appendix G.

3. Initial Data Gathering

Prior to the team's visit, it sent the NCC Site Director and the EEOC Project Manager a data request document pertaining to typical call center operations (e.g., workforce management, call handling techniques, call metrics, agent performance management, and customer satisfaction) stats. The team followed up with a phone call to the Site Director and the contract administrator to explain the details of the requirement, and received data in the form of monthly reports that the NCC sends to the EEOC. The team conducted some basic trending and correlation analyses on call volume, call duration, and primary reasons for calls using Microsoft Excel and SAS.¹⁶

¹⁴ The Director Survey responses were compiled manually and therefore are not available with the survey instrument.

¹⁵ Convergys took the lead in evaluating the operation of the NCC.

¹⁶ SAS Institute, Inc., Statistical Software Version 9.1

4. Remote Call Monitoring

The JPS Team obtained a remote calling number from the NCC. Remote calling numbers are established so that a third party (other than the caller and CSR) can dial into the call and listen to the conversation. A team of four people dialed into the remote calling number and monitored several calls to gain a high-level understanding of the call flow and gather call statistics. The team used a proprietary call observation tool to conduct the call monitoring exercise. This tool enabled the team to capture information such as call start and end time, amount of time spent in caller identification, amount of time spent in problem identification and resolution, call reason, call disposition, whether the call was transferred, number of holds, caller questions, and CSR answers.

The team dialed into the remote monitoring number during different times of the day and different days of the week in order to capture a sufficient cross section of calls. The team monitored 411 calls over a four-week period from October 26, 2005 to November 17, 2005.

The team compared its results with the EEOC reports and found the numbers from both sources were comparable. The information the team collected during this exercise therefore served as the primary source of data for most of the team's NCC assessment analyses.

5. NCC Site Visit

The team prepared an agenda for focus groups and interviews. It also prepared interview guides and a focus group protocol. The team sent the agenda and interview/focus group protocol to the site director a week in advance of the site visit. The site director responded with the names of the personnel who would participate in the focus groups and interviews. The team made a few changes based on knowledge acquired during the remote call monitoring sessions. The Interview Guide is attached as Appendix G, and the Focus Group Protocol, as Appendix H.

The JPS Team spent the week of November 7, 2005 at the NCC, assessing its operations. The team asked NCC employees in the interviews and focus groups about their job description, their understanding of NCC objectives, metrics the EEOC uses to measure the effectiveness of the NCC, and potential improvement opportunities. When meeting with management personnel, the team inquired about management and coaching techniques. The team also met with the reporting, technical, and training subject matter experts who explained their current processes, issues, and opportunities for improvements.

The JPS Team conducted interviews with the Site Leader, Team Leaders, and the Quality Manager. The team also led focus groups with the CSRs and conducted side-by-side observations of CSR English calls, TTY calls, faxes, and emails. In addition, the team reviewed monthly reports, scripts, and training manuals. The team also reviewed the NCC processes for call handling, reporting, training, and call monitoring.

Because the NCC is in the pilot phase and in transition, many things have changed since the beginning of the evaluation the NCC. The team based most of its evaluation on the detailed analysis and the situation during its site visit in November and December 2005.

6. Data Analysis

While visiting the NCC, the JPS Team collected scripts used in answering the calls, data on call flows, training quizzes and answer keys, call monitoring forms, and EASQs. The team analyzed this information, along with other data collected during all of the above listed activities, with quantitative analysis techniques. The team used qualitative data collected during the interviews and focus groups to develop hypotheses. The team used the quantitative data collected during the remote call monitoring sessions and from the NCC reports to quantify the impacts.

7. Customer Satisfaction Data Analysis

The NCC had no data on customer satisfaction when the team began its work; therefore, the team attempted to collect customer satisfaction information as a part of its call monitoring exercise. The team tried to capture CSR empathy, professionalism, and subject knowledge, as well as overall customer satisfaction with each call; however, because a small group of individuals monitored most of the calls, there was no variation, and, therefore, the team could not use the data in its analysis.

During the course of the project, the EEOC contracted with CFI Group to collect customer satisfaction data. The JPS Team conducted an initial benchmarking analysis comparing their initial customer satisfaction index to the best practices with Federal agencies and in general to service industries in the private sector. The team also compared the results between channels and reviewed the detail analysis to understand other aspects of satisfaction.

III. FINDINGS AND CONCLUSIONS

A. THE NCC IMPLEMENTATION

The JPS Team compared the 2003 Assessment Report with the NCC implementation as well as the metrics required in the Pearson Contract with the metrics that are submitted to the EEOC.

1. 2003 Assessment Report recommendations implemented.

The EEOC has successfully implemented several of the recommendations in the 2003 Assessment Report. The Report included a number of recommendations pertaining to establishing an NCC. As shown in Table 2 on the following page, the NCC and EEOC have followed each of the recommendations.

Table 2. Implementation of the 2003 Assessment Report Recommendations

	2003 Recommendations	Findings of Current Evaluation
1.	Establish an NCC to handle all unsolicited public inquiries received by all field offices. At this time, do not include Office of Federal Operations or Field Management Programs in the NCC.	To establish the NCC, the EEOC signed a contract with NCS Pearson, Inc., dated September 20, 2004 that was amended on September 28, 2005. The contract includes the consolidation of two toll-free phone lines (voice and TTY) for general inquiries and centralized email access via the Internet.
2.	Competitively outsource the NCC to get the best value for start-up and operations; use the Statement of Objectives procurement process to expedite implementation.	The contract was competitively bid: full and open procurement, best value award.
3.	Start operations with a pilot phase for at least two years. Collect baseline data on performance metrics and costs during the first 12 months and assess vendor performance. The pilot should be national in scope.	Initial contract is for two years with an option to renew for three years (annually or for all three years). The NCC is serving all 51 offices in the field.
4.	NCC services should cover the spectrum of basic inquiries, Frequently Asked Questions (FAQs), information on laws and procedures, the EEOC Report series, office hours, locations, staff directories, and case information, with caller authentication. The NCC should respond to inquiries from Potential Charging Parties (PCPs) and assist in completing on-line charge questionnaires, if appropriate. Other services to phase in later include handling email, facsimile, postal mail, and fulfilling requests for publications and printed materials. The NCC should not handle filing charges.	The NCC handles calls and other correspondence about basic inquiries, including: EEOC Overview, contact information for EEOC offices as well as for other Federal agencies, hours of operation, how to file charges, eligibility criteria, and Charge status. The NCC also updates the FAQs on the website and handles TTY calls, emails, faxes, and other formats of correspondence. They take Spanish and English calls and use a tele-interpreter for other language calls. The NCC does not handle filing of charges.
5.	Modify EEOC Order 150.005 to allow for monitoring/recording of calls of contact center employees for quality assurance purposes.	Effective January 14, 2005, a paragraph was added to EEOC Order 150.005 to permit monitoring and recording calls between NCC employees and the public for purposes of quality assurance.
6.	Develop internal and external marketing strategies to communicate the compelling case for a national contact center to the EEOC's staff, customers and stakeholders to solidify support for this initiative.	National Contact Center Outreach Plan, Version 2.0, dated February 2, 2005. For each external and internal action item there are target completion dates, responsible groups, and an indication of any funds needed.

2. Pearson is meeting most contractual metrics.

The JPS Team compared performance targets to actual performance from September 2005 through April 2006. As Table 3 shows, most of the contractual metrics and objectives set forth in the Pearson Contract are being measured. Customer Satisfaction was originally intended to be measured by a third party and monitored on a regular basis by the NCC Quality Manager. However, due to the long approval processes required by the Office of Management and Budget (OMB), the EEOC determined that the results would not be available in time for the decision on whether to renew the Pearson Contract. As a result, the EEOC contracted with CFI Group to conduct a one-time customer satisfaction survey. The survey was completed in the month of February, 2006, for all of the contact types (eg. Fax, telephone calls, written correspondence) handled by the NCC.

NCC is meeting most of the performance metrics specified in the contract, except for Average Speed of Answer, which they met five of eight months (September 2005 through April 2006). Due to technology issues related to recent increased volume, the wait times have been high since the middle of April 2006 (up to 25 minutes before the CSR comes on the line). As of June 19, 2006, this problem was resolved.

Table 3. Comparison of Contractual Performance Metrics and Reporting Status

Performance Metric in Pearson Contract	Expected Target in Pearson Contract	Extent the NCC Met or Exceeded the Target
Call Monitoring Scores	90% – 95% of monitored calls	100%
Accuracy of Information Provided (Measured through Call Monitoring)	95% - 97%	100%
Accuracy of Information Captured (Measured through Call Monitoring)	95% - 97%	100%
Customer Satisfaction	70% – 75% satisfied or extremely satisfied	Customer Satisfaction Index is 77*
Service Level – Average Speed of Answer	70% to 80% in 30 seconds or less	62.5%
Average Speed to Respond to Email	70% - 80% in one business day	100%
Average Speed to Respond to Fax	70% - 80% in two business days	100%
Average Speed to Respond to Written Correspondence	70% - 80% in two business days	100%
Blocked Calls	1% - 3%	100%

* Gathered for the week of February 7-13 by an independent contractor. The index is not a percentage. See Section III G8.

B. COMPARISON OF NCC ESTIMATES VERSUS ACTUAL STATISTICS

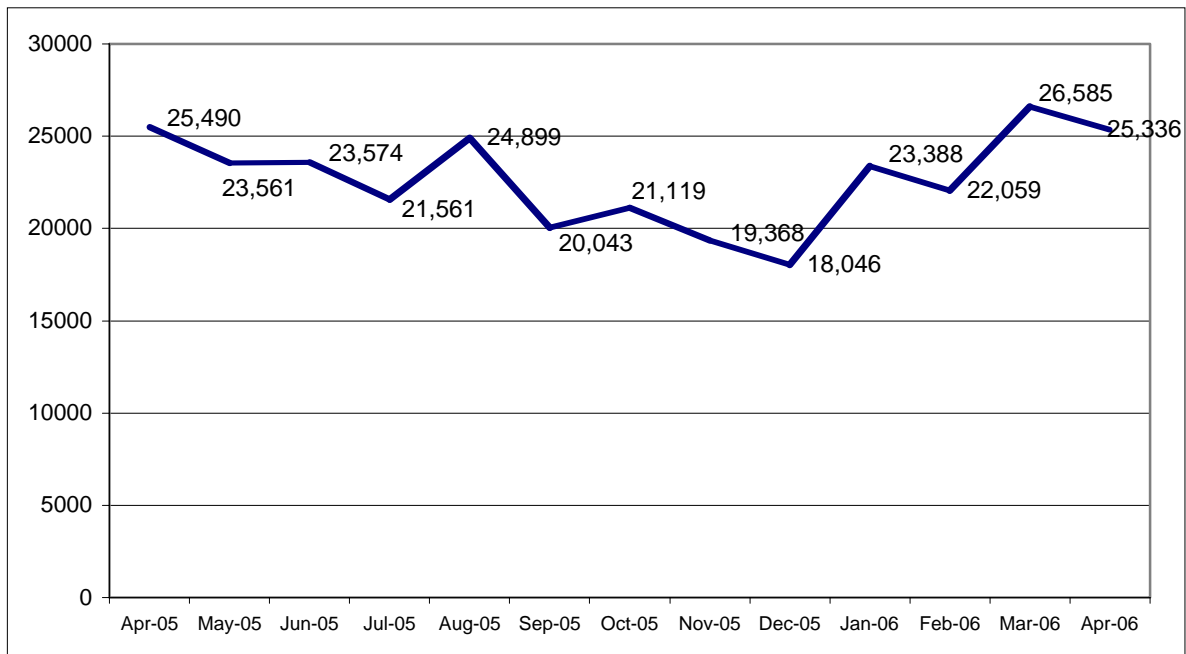
1. The actual call volume and savings in staff hours are less than projected.

The JPS Team reviewed and compared several estimates of NCC activity contained in the 2003 Assessment Report with 2005 actual statistics. Based upon NCC reports and call monitoring analyses, call volume is lower than 2003 estimates, which has resulted in less EEOC field staff time saved compared to projections. During the first year of pilot operations (April 2005 – March 2006), the NCC received 269,693 calls.

The 2003 Assessment Report estimated all unsolicited calls to offices in the field (toll-free and local). According to comments from OFP, prior to implementation, the decision was made to route only toll-free calls to the NCC, with unsolicited calls to each office in the field handled locally. Therefore, the baseline 86,824 calls identified in the 2003 Assessment Report (1.2 million calls annually) will be higher than the anticipated number of calls to the NCC until the EEOC decides to require that offices direct all unsolicited calls to the NCC. The present call volume to the NCC is also low because call volume to the EEOC's toll-free numbers has decreased 17.5 percent (when comparing March 2003 to March 2006). This is consistent with reduced annual charge receipts since fiscal year 2003 (see Figure 2).

The NCC handles a variety of different types of communication, including calls handled by CSRs, calls handled by IVR, and other forms of written communication. Figure 1 below shows the call volume (English, Spanish, and TTY calls handled by CSRs) by month as well as the trend of calls. As the figure shows, there is not a significant variation month over month (except from December 2005 to January 2006 and February to March 2006) or a clear trend showing an increase in the number of calls received by the NCC.

Figure 1. English, Spanish and TTY Calls Handled by the CSRs, April 2005-April 2006



In addition to calls handled by a live person, Table 4 shows the number of calls handled by the IVR during the first 13 months of operations. There is no particular pattern evident in the number of calls terminating at the IVR.

Table 4. IVR Calls Handled by the NCC

Month	IVR Calls
April-05	8,739
May-05	8,342
June-05	7,981
July-05	6,708
August-05*	8,300
September-05	7,812
October-05	8,705
November-05	7,207
December-05	6,014
January-06	8,363
February-06	7,885
March-06	8,564
April-06	8,028

*Estimate due to NCC equipment malfunction

The NCC also handles other forms of communication, including emails, written correspondence, web inquiries, and faxes. As shown in Table 5, the NCC receives and processes significantly more emails than other forms of communication.

Table 5: Other Forms of Correspondence Handled by CSRs

Month	Email	Written Correspondence	Web Inquiries	Fax	Total Other Correspondence
April-05	1,436	52	209	36	1,733
May-05	1,436	46	264	45	1,791
June-05	1,417	67	267	72	1,823
July-05	1,296	51	265	64	1,676
August-05	1,549	75	292	48	1,964
September-05	1,551	62	348	63	2,024
October-05	1,476	68	293	74	1,911
November-05	1,254	75	274	73	1,676
December-05	1,247	58	221	62	1,588
January-06	1,540	71	257	84	1,952
February-06	1,379	44	359	69	1,851
March-06	1,363	62	865	64	2,354
April-06	1,313	51	719	76	2,159

Since the 2003 Assessment Report was based on actual calls answered by EEOC employees and not calls handled by message machines, the JPS Team's evaluation will consider only actual calls handled by the CSRs so that the numbers are comparable. The evaluation does not use calls handled by the IVR to compare estimates with actual results, as they could include misdialed numbers; further, if a call can be answered by an IVR at the NCC, it can also be handled by an IVR at any EEOC office. It is difficult to determine whether callers obtain useful information from the IVR without an in-depth analysis of the IVR. Calls handled by the IVR are not equivalent to calls handled by EEOC employees, because no matter where they are handled, they would not require an EEOC employee.

During the first full year of operations (April 2005-March 2006), the CSRs handled 269,693 calls. During the second full year of operations, the JPS Team projects that the NCC will receive between 273,804 (annualized based on the average of the 13 past months) and 319,020 (annualized based on the March 2006, the month with the highest call volume) total calls. The higher projection must increase four times to reach the volume anticipated in the 2003 Assessment Report.

Based on the estimated annualized volume of 273,804 calls per annum and the 51 percent resolution rate achieved by the NCC,¹⁷ the team estimates that the NCC saves the EEOC 13,964 staff hours.

¹⁷ Based on Call Observation analysis

Table 6. Comparison of 2003 Survey Data to 2005 Evaluation Findings

Measure	Estimates from 2003 Assessment Report	Current Report Findings
Call Volume	Projection of 1.2 million calls <ul style="list-style-type: none"> • Based upon 86,824 calls received by the field and Headquarters in 20 working days 	269,693 calls handled by CSRs
Contact Channels	<ul style="list-style-type: none"> • EEOC Field Offices • EEOC Headquarters 	<ul style="list-style-type: none"> • EEOC Field Offices • EEOC Headquarters • NCC <ul style="list-style-type: none"> ○ English Calls ○ Spanish Calls ○ Language Support ○ TTY ○ Fax ○ Email ○ Written Correspondence ○ Web Inquiries
Call Duration*	<ul style="list-style-type: none"> • 69% - Up to 3 minutes • 16% - Between 3 and 5 minutes • 9% Between 5 and 10 minutes • 4% Between 10 and 20 minutes • 2% Above 20 minutes A significant percent of the calls were less than 3 minutes.	Average handle time for calls is six minutes. Calls vary between 2 and 15 minutes, depending upon the call type.
Time freed up for EEOC employees to engage in investigations, outreach, and support activities with implementation of the NCC.	Estimated savings of 43,224 hours for GS 5, 7, 9, 11, 12, and 13	Estimated savings of 13,964 hours per year based on data collected from the NCC.

*Call duration for contact center operations are typically reported in averages

The JPS Team compared the NCC estimates listed in the Pearson Contract with actual statistics. The Pearson Contract contains estimates for the first six months of NCC operations. As shown in Table 7, the NCC has received substantially more emails than expected and significantly fewer calls and faxes.

Table 7. Six Month Estimates in Pearson Contract Compared to Actual Statistics, April through September 2005

Estimates in Pearson Contract	Actual
<ul style="list-style-type: none"> • English IVR – 719,554 • English CSR- 306,332 • Fax – 4,500 • TTY English – 3,245 • English Email – 2,381 	<ul style="list-style-type: none"> • English IVR – 47,882 (the numbers for August 2005 are estimates as the actual numbers were not available due to malfunction of the IVR) • English CSR – 130,822 • Fax – 327 • TTY English – 1,139 • English Email – 8,616

C. NCC IMPACT ON HEADQUARTERS OPERATIONS AND STAFF

The JPS Team reviewed written and telephone communication, website activity, charge statistics, and outreach efforts at Headquarters. The team found little impact attributed to the NCC. The fiscal year data presented below was provided by the EEOC.

- 1. Written and telephone communications to Headquarters decreased. There may be a relationship between reduced communications and implementation of the NCC; however, there are no data indicating the decrease is attributed to the NCC.**

Controlled Correspondence

Congressional Correspondence and Correspondence to the Chair decreased over the past three years. The reduction in Congressional Correspondence (generally pertaining to status of Federal Sector complaints) typically relates to inquiries about case status and may be the result of the normal fluctuation of appeals in the Federal sector. It is also possible that the 29.5 percent reduction in correspondence from 2004 to 2005 reflects better service by offices in the field as well as the Office of Federal Operations due to the NCC answering calls, thus enabling employees to manage their workload more effectively, resulting in fewer complaints.

Table 8. Congressional Correspondence to Headquarters, 2003-2005

Fiscal Year	Congressional Correspondence	Percent Reduction
2003	1,407	-
2004	1,403	.28
2005*	988	29.50

*NCC implemented 3/21/05

As shown in Table 9 below, Correspondence to the Chair increased in relation to operations in the field during the first six months of NCC operations, and then decreased. When comparing equivalent periods pre- and post-NCC implementation (October through March), there is an 8 percent decrease in correspondence related to Headquarters operations and a 16 percent decrease related to field operations. The combination of better customer service, increased outreach, establishment of the NCC, and increased information on the EEOC's website (including the FAQs developed by the NCC) may have resolved concerns that in previous years would have resulted in written correspondence to the Chair.

Table 9. Correspondence to the Chair, October 2004-March 2006

Fiscal Year	Headquarters Operations	Percent increase (decrease) from previous period	Field Operations	Percent increase (decrease) from previous period	Total	Percent increase (decrease) from previous period
1 st Half 2005 (October-March)	129	-	150	-	279	-
2 nd Half 2005 (April-September)*	206	59.7	180	20.0	386	38.4
1 st Half 2006 (October-March)	119	(42.2)	126	(30.0)	245	(36.5)

*NCC implemented March 21, 2005

Telephone calls to the main EEOC public number

Table 10 on the next page shows available data for telephone calls to the public EEOC telephone number (202/663-4900). Over the past four calendar years, there has been a steady reduction in total calls. Data for the 2004 and 2005 calendar years are incomplete, but four months are comparable. There is a similar reduction in total calls pre- (February 2005) and post- (May and June 2005) NCC implementation. There is a larger percentage reduction in total November calls. When considering just the calls related to the field offices, there was a larger reduction in calls pre-NCC (February) than post-NCC (May). It is possible that some of the call reduction can be attributed to the NCC.

Table 10. Comparison of Four Years of Telephone Contacts to EEOC Headquarters

Month	Total Headquarters Calls					Calls to Headquarters Regarding Field Offices		
	2002	2003	2004	2005	Percent Reduction 2004-2005	2004	2005	Percent Reduction
January	6,423	8,877	2,897	*	-	*	*	-
February	7,831	7,246	2,994	1,812	39.5	811	308	62.0
March	9,977	*	3,595	*	-	963	*	-
April	6,834	*	*	*	-	*	*	-
May	9,753	*	1,943	1,342	30.9	500	261	47.8
June	8,316	*	2,502	1,616	35.4	*	371	-
July	6,838	*	*	996	-	*	417	-
August	11,841	*	*	*	-	*	*	-
September	8,738	*	*	*	-	*	*	-
October	8,843	*	*	*	-	*	*	-
November	9,398	*	2,268	1,124	50.4	*	308	-
December	6,287	*	*	*	-	*	*	-

*Missing or incomplete

Office of Field Programs (OFP)

OFP Management has a general sense that telephone complaints from the public to OFP regarding an inability to reach an EEOC employee in the field by telephone have diminished, but there is no tracking system to show numbers or types of complaints.

2. Website activity has increased and it is possible that some of the increase is attributable to the NCC.

The total number of visitors to the EEOC website has increased over the past five years. During the first seven months of Fiscal Year 2006, average monthly user sessions have continued to increase to 551,490. According to the Web Site Content Manager, this reflects a typical growth pattern for Federal websites.

Table 11. Average Monthly Website Hits, Fiscal Years 2001-2005

Fiscal Year	Average User Sessions/Month	Percent Increase
2001	208,534	-
2002	246,756	18
2003	340,706	38
2004	360,000	6
2005	444,533	23

For the last six months of fiscal year 2005, the NCC’s IVR provided the NCC web site address, and NCC staff also informed customers about information available on the web site; therefore, some of the increase from 2004 to 2005 may be attributable to the NCC. It is also possible that customers who visited the website when they were unable to get through to field offices are now contacting the NCC and getting their questions answered before visiting the web site.

The EEOC developed the FAQ page on its website in conjunction with the formation of the NCC, and the NCC manages the order of the questions on the page (the most frequently asked questions appear first). There was an average of 11,285 visits to the FAQs over the 12 months from April 2005 through March 2006, with a range from 9,234 to 15,440 visits. Nearly 45 percent of the total FAQ web hits were related to intake and charge filing.

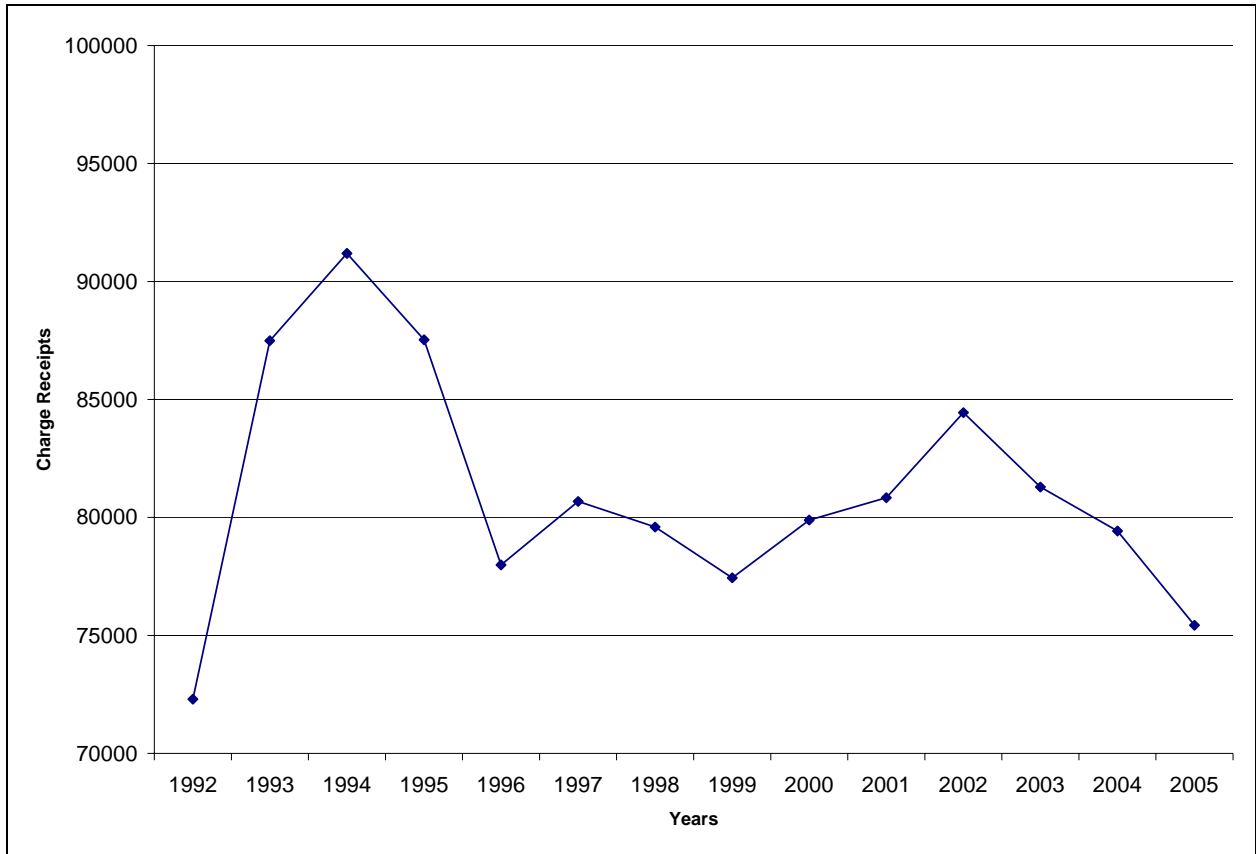
3. Post-NCC implementation, the pattern of annual and monthly charge statistics remains consistent with prior years.

Charge Statistics – Annual and Monthly

Over the past 13 years, the volume of charge statistics has varied. As shown in Figure 2 on the next page, the general change across time appears to be cyclical.¹⁸

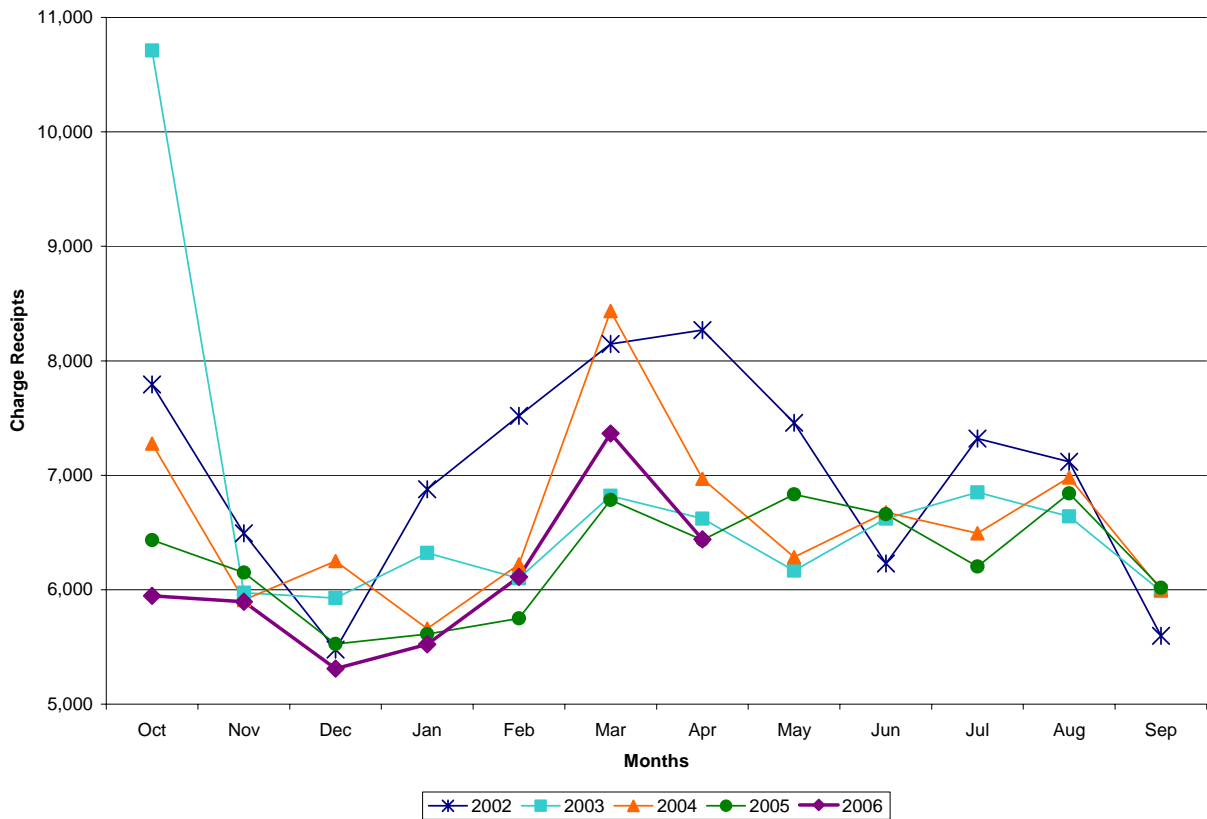
¹⁸ There were insufficient data to model the charge behavior or explain the change across time.

Figure 2. Annual Charge Receipts, Fiscal Years 1992-2005



Following is a comparison of the monthly individual charge receipts for four fiscal years (2002-2005) and October through April of the current year. While there are monthly differences in total receipts, the overall pattern of receipts across each of the 12 months has remained consistent. There have been no significant fluctuations since the inception of the NCC.

Figure 3. Monthly Charge Receipts, Fiscal Years 2003-2006



4. Employees perceive a need for increased awareness of the NCC, and efforts are underway to broaden publicity.

Managers and employees interviewed at field sites as well as respondents to both the director and employee surveys indicated that they believe the EEOC needs more visibility and that it is not sufficiently publicizing its mission or its toll-free number. They suggest that current outreach events inform human resources groups, but that most employees in small-to-medium sized companies do not know about the mission or work of the EEOC. The national outreach group at Headquarters conducts 5,000 to 6,000 outreach events per year, as well as 500 to 600 media events that reach hundreds of thousands of people. As a result, many employers know about the EEOC; further, in an effort to reach more employee groups, the EEOC is continuing to expand their advisory councils and partner with other agencies.

EEOC/NCC Awareness. Specific to the NCC, a few survey respondents commented that many potential EEOC customers do not know about the toll-free number, even though it has been in existence since 1991. Interviewees suggest developing an advertising campaign similar to the Freedom to Compete and Youth at Work initiatives. Survey respondents recommended providing pamphlets about the NCC to each individual coming into the offices, having every office redirect callers receiving voicemail to the NCC’s 800 number, and contacting civil rights organizations (e.g., National Hispanic Civil Rights) to provide awareness of the NCC’s services

in their communities. The EEOC anticipates launching a major new advertising campaign in July 2006 to link the NCC and the 800 number. The plan currently includes a theme and logos to increase awareness of the 800 number. This effort will include developing and distributing brochures, handouts, and promotional giveaways. There will also be press releases and stories for field offices to send to local print media contacts including ethnic and minority publications. In addition, there are plans for radio and Internet Public Service Announcements. This campaign is intended to create awareness among target audiences of the EEOC's readiness to help, position the 800 number as the preferred method to access the EEOC, and increase inbound calls to the NCC. The EEOC ordered promotional materials for this campaign on June 15, 2006, and plans to distribute them to field offices a few weeks thereafter.

Telephone Listings. Headquarters is currently responsible for entering and updating all telephone listings in local telephone books. Listings are submitted to GSA for entry into the Blue Page (Federal) section of local telephone directories. The EEOC provides GSA with both the toll-free and local numbers. Therefore, the toll-free number should be listed in all local directories, but a review of local telephone directories by field personnel revealed that the NCC toll-free number is listed in the government listings section of printed telephone directories for 36 cities across the country, but not listed in another 27 cities.

In addition, the on-line blue pages directory (<http://www.usbluepages.gov/index.html>) lists the local telephone number for EEOC offices under "discrimination" but does not list the NCC toll-free number. It also does not list the EEOC under the category "Agencies and Services." The EEOC has recently made a decision to publish the numbers under "discrimination" and Equal Employment Opportunity Commission and to work with GSA to ensure the toll-free numbers are published in local directories.

The EEOC has made a policy decision to continue to publish local telephone numbers in the blue pages. This policy limits the number of calls going to the NCC and the potential number of customers served by the NCC, particularly since not all offices redirect first-time callers to the NCC (discussed later).

D. NCC IMPACT ON EFFICIENCY AND EFFECTIVENESS OF FIELD OPERATIONS

There have been some reductions in unsolicited calls to the field offices. The CSRs are not resolving as many calls as they could.

1. Field employees have mixed perceptions of the impact of the NCC on call volume to offices.

Comparing call volume pre- and post-NCC, employees in focus groups indicated a perceived decrease in calls in an average week, ranging from a 0 to 60 percent. Respondents to the director survey who reported reduced call volume thought their employees were better able to answer and return phone calls on a timely basis. This has relieved pressure on people answering phones, and now fewer people must answer “cold calls” (initial calls from the public).

A few respondents to the director survey indicated they have not experienced a drop in call volume. As suggested by some employees in focus groups, one reason may be that the NCC is picking up calls that have been previously dropped or lost due to telephone technology, thus increasing the workload.

The electronic survey asked employees who answer and/or return unsolicited calls to their office public number to estimate the number of calls they received in an average week before and after NCC implementation. The data showed a clear break in the distribution between 400 and 600 total calls. Cases reporting more than 400 calls were considered outliers and removed.¹⁹ The results show that employees in Pay Grade 4 perceived a 76.9 percent reduction in calls and that employees in Pay Grade 8 perceived a 44.7 percent reduction. Respondents in Pay Grades 5, 7, and 12 perceived an approximate 25 percent reduction. The mean increase in calls reported in Pay Grade 15 is largely attributable to one person who indicated 150 more calls post-NCC versus pre-NCC.²⁰

¹⁹ Outliers are typically a few extreme cases that can distort the interpretation of summary statistics.

²⁰ This person’s responses did not meet the 400-call cut-off for outliers, so the case was retained.

Table 12. Mean Change in Calls to Office Public Telephone Numbers in the Field, Pre/Post-NCC

Pay Grade	Mean Calls Pre-NCC	Mean Calls Post-NCC	Mean Call (Reduction) Increase per week	Percent (Decrease) Increase	Number of Employees Responding
4	32.5	7.5	(25.0)	(76.9)	2
5	79.6	58.8	(20.8)	(26.1)	39
6	23.3	14.7	(8.6)	(36.9)	16
7	87.8	66.3	(21.5)	(24.5)	43
8	63.3	35.0	(28.3)	(44.7)	6
9	44.0	34.3	(9.8)	(22.3)	24
11	16.5	15.9	(0.5)	(3.0)	15
12	43.0	31.6	(11.5)	(26.7)	251
13	33.6	30.3	(3.3)	(9.8)	81
14	16.7	14.0	(2.6)	(15.6)	73
15	17.5	26.7	9.3	53.1	11
SES	15.0	10.7	(4.3)	(28.7)	3

Comments from some survey respondents indicated that they perceive no reduction in calls. It is likely that some offices are receiving more calls, perhaps due to increased outreach, and some offices receive fewer calls. It is also possible that some employees have the same number or more calls because of other factors, such as attrition.

Support staff in one field office mentioned that PCPs have said that the NCC is telling them to call offices directly, which may be another reason why employees do not perceive reduced telephone calls to their public number. In part, this is occurring because of NCC business rules requiring that the CSRs advise some callers to contact the EEOC office directly. Callers directed to the field offices are those who specifically request to contact the office, have complex or unusual questions for which the NCC has no approved scripts, or insist on speaking with the office even though the EEOC does not have jurisdictional coverage or time limits have expired.

Another possible reason that calls have not decreased more significantly may be related to NCC operations. The NCC does not measure or monitor call resolution, and the CSRs take very little ownership of the call. During the JPS Team's call monitoring and side-by-side observations, it observed that some CSRs subtly push the callers to contact the EEOC offices directly when they should take time to answer their questions and/or fill out the EASQ. The NCC's focus on Average Handle Time (AHT) may be pushing the CSRs to get off the phone to meet their AHT goal. This combination of business rules and CSR practices may account for reports from many employees in the field that the NCC has had little positive impact on them.

The JPS Team was able to identify the impact of the NCC on the call volume for the Dallas and Charlotte District Offices because they tracked the number of telephone calls received on their

public line pre- and post-NCC.²¹ As shown in Table 13, the impact of the NCC on telephone calls differed for each office. The Charlotte Office realized increased telephone calls and, therefore, a net increase in contacts (telephone calls and NCC forms) after implementation of the NCC. During the team’s site visit, the Charlotte District Director indicated they may be receiving increased calls due to outreach efforts. Commencing in January 2006, callers to the Charlotte Office received a recorded message to contact the NCC if they were calling during specific times before or after regular business hours (8:00 a.m. to 8:30 a.m. and 5:30 p.m. to 8:00 p.m. EST).

The Dallas Office experienced a net decrease in calls to their public number, for an average monthly savings of 489 contacts for the months of October through December 2005 and 302 contacts for the months of January and February 2006. The relatively larger number of NCC forms in January/February 2006 over the previous quarter is likely due to two factors: in January, the Dallas office started redirecting overflow calls during the day to the NCC, and also received some duplicate GroupWise emails during this period.

Table 13. Comparison of Charlotte and Dallas District Office Telephone and NCC Forms

Office / Months	Telephone Calls			Average No. EAS/Group Wise sent to Office	Net Increase / (Decrease) in average contacts to EEOC Office
	Average Calls Pre-NCC	Average Calls Post-NCC	Average Increase (Decrease)		
Charlotte					
May-September (2004 and 2005)	495	878	383	59	442
January-February (2005 and 2006)	537	839	302	174	476
Dallas					
October-December (2004 and 2005)	1,798	1,135	(663)	174	(489)
January-February (2005 and 2006)	1,754	936	(818)	516	(302)

The JPS Team also compared the first two months of NCC operations with two recent comparable months.²² As shown in Table 14, both offices are realizing decreased telephone calls. This may be because both offices are redirecting overflow calls on their intake lines during the day. The Charlotte office experienced a net decrease in contacts from the public, whereas the Dallas Office experienced a net increase. EASQs sent to the Dallas Office for March and April 2006 increased by 50 percent. The increase in contacts at the Dallas Office may be related to

²¹ The months reported for the respective offices are somewhat different due to missing data.

²² Both offices were in the one-month pilot study during March 2005.

their decision in January to redirect those callers who reach voice mail during the day to the NCC.

Table 14. Comparison of Dallas District Office Telephone Calls and NCC Forms

Office	Telephone Calls			Average Increase (Decrease) in EAS/GroupWise per Month	Net Increase (Decrease) in Number of Contacts
	Average March and April 2005	Average March and April 2006	Net Increase (Decrease)		
Charlotte	963	712	(251)	188	(63)
Dallas	1,390	1,064	(326)	457	131

- 2. The NCC receives low call volume, and the NCC is not resolving as many calls as it could. Therefore, the NCC has had minimal impact on the call volume received by EEOC offices.**

Call Volume

According to the NCC reports sent to the EEOC, over the first 13 months of operations, the NCC handled an average of 22,695 calls and 1,879 other forms of correspondence per month. As discussed earlier, this is substantially lower than the estimates in the 2003 reports.

One factor affecting total calls to the NCC is changes in EEOC policies during the timeframe of this analysis. From April through most of November 2005, customers called either the toll-free number (answered by the NCC) or the local number (answered by the EEOC offices). From November 2005 through March 2006, the EEOC gradually authorized, but did not require, offices to put a message on their voicemail redirecting first-time callers to the NCC.

In May 2006, the JPS Team called each office during and after business hours to determine the extent to which offices presently redirect callers to the NCC. As Table 15 shows, 28 of 51 offices redirect callers to the NCC after normal business hours.

During business hours, the team reached 19 live people and 32 message machines. One of the EEOC Receptionists redirected the team to the NCC. The Receptionist for that office answers general questions such as location and office hours and refers all other “cold calls” to the NCC. According to the Office Director, customers have not objected to calling the NCC after talking with the Receptionist.

Of the 32 message machines the team accessed during business hours, 19 redirected callers to the NCC. Twelve of those offices also redirect callers after business hours.

Table15. Calls to Offices During and After Business Hours

Office Response	After Hours	During Business Hours	
		Message Machine	Person
No answer after three tries*	2	-	-
Redirect Callers to NCC	28	19	1
Do Not Redirect Callers to NCC	21	13	18
Total Number of Offices	51	32	19

*The first time the JPS team called offices after hours, it received no answer or an indication of a full message box for five offices.

As Table 16 shows, there has not been a significant increase in either call volume or other forms of correspondence for the month of April 2006 when compared to the other months, and, particularly, April 2005. The increases shown in January through April 2006 may reflect the normal increase in inquiries during the second fiscal quarter (see Figure 3); therefore, the team does not expect a significant change in volumes unless the EEOC develops a policy requiring all field offices to redirect their unsolicited calls to the NCC.

Table 16: Contacts Handled by NCC

Month/Year	CSR Contacts		
	Total Calls Handled	Total Other Correspondence	Total
April-05	25,490	1,733	27,223
May-05	23,561	1,791	25,352
June-05	23,574	1,823	25,397
July-05	21,561	1,676	23,237
August-05	24,899	1,964	26,863
September-05	20,043	2,024	22,067
October-05	21,119	1,911	23,030
November-05	19,368	1,676	21,044
December-05	18,046	1,588	19,634
January-06	23,388	1,952	25,340
February-06	22,059	1,851	23,910
March-06	26,585	2,354	28,939
April-06	25,336	2,159	27,495

Call Resolution

The JPS Team captured information indicating the extent that CSRs resolve calls during its remote call monitoring. The team recorded a call as “resolved” when, upon hanging up with the CSR, the caller would not have to contact or be contacted by an EEOC office; for example, non-jurisdictional calls, PCPs requesting general information, and CPs inquiring about charge status were considered resolved at the NCC. The team’s analysis shows that the NCC is successful in resolving 51 percent of its calls. These calls relate mostly to general inquiries or information about other Federal agencies. The other 49 percent of the calls to the NCC are either referred (the caller is asked to contact the local EEOC office) or forwarded via an EASQ to the EEOC office.

Table 17: Call Types by Resolution at NCC for Calls Handled by NCC

Call Type	Description	Percent Forwarded / Referred to EEOC	Percent Handled by NCC
Eligibility Criteria	Call relating to general overviews, inquiring to understand their rights, etc.	43	57
Charge Status	Caller has already filed a charge and wants to know the status	59	41
File a Charge	Caller is interested in filing a charge	70	30
Non EEOC Related	Caller is seeking information about other Federal agencies	0	100
EEOC Office Information	Caller is seeking information about an EEOC office	20	80
Other	Other types, e.g. caller wants a publication, an employer calling, complaints about the EEOC, etc.	42	58
Total	All Calls	49	51

As shown in Table 18, the 51 percent of calls that are resolved at the NCC equate to approximately 13,964 staff hours per year, which is equivalent to 6.7 Full Time Equivalent (FTE) Investigators.²³

²³ Per the Office of Personnel Management, 1 FTE=2,080 hours (<http://www.opm.gov/feddata/html/2004/november/intro.asp>)

Table 18. Average Hours Saved per Month

Metric	Projected	
	Current Value (Based on Average Call Volume for first 13 months of NCC Operations)	Best Case (Based on Call Volume for March 2006, claimed as the busiest month for NCC)
Projected annual calls (1)	273,804	319,020
Percent of calls resolved by CSRs	51%	51%
Annual call volume handled by the CSRs (2)	139,638	162,700
Call duration in minutes	6	6
Staff hours saved per year	13,964	16,270
Staff hours saved per month	1,164	1,356
FTE	6.71	7.82

(1) Actual total calls for April 2005 through March 2006 was 269,693

(2) Excludes IVR calls

This hourly savings per month is consistent with employee comments that they perceive little savings resulting from the NCC taking calls to their office public number.

E. NCC IMPACT ON FIELD STAFF

The NCC is beginning to create additional time for field staff, but some factors are limiting further improvement. Both organizations are duplicating work, and the NCC is creating more work by sending EASQs and GroupWise emails that are often inaccurate and incomplete. The NCC also inconsistently forwards “hot line” callers (those at risk of losing their right to file under the Statute of Limitations (SOL)). Comments about the NCC (by EEOC management and employees) were generally similar across all visited offices.

1. **The NCC has created some additional time for field staff to perform other duties.**

Redirecting Office Resources

Fourteen respondents to the director survey indicated that the NCC has helped address some of their office staffing resource challenges (Investigators, 6 offices; Support Staff, 8 offices), as shown in Table 19,. Six respondents indicated that the NCC has saved Investigators time because they no longer have to answer unsolicited calls on their office public number or return calls that are not in the EEOC’s jurisdiction. Eight respondents said that the NCC has improved the efficiency and effectiveness of their support staff, and some Directors have been able to redirect their support staff to help Investigators. Eleven of these fourteen offices are redirecting callers to the NCC after business hours. The JPS Team found no relationship between these 14 offices and Merit Factor or Non-ADR Resolutions per available Investigator.

Two respondents to the director survey indicated no ability to redirect resources, which they attributed to an increased number of inquiries since launching the NCC. Five respondents reported that the NCC has increased their workload, particularly at the supervisory level, largely because supervisors review and track the NCC forms to ensure that staff handle them appropriately, which causes them to get behind in other duties. All remaining offices reported no ability to redirect resources. Reasons cited included increased paper and follow-up work related to EASQ and GroupWise emails, and attrition over the past few years (people are still behind in their duties).

Table 19. Impact of the NCC on EEOC Offices

Impact on Offices	Number of Offices				
	District Office	Field Office	Area Office	Local Office	Total Offices
Some positive impact for Investigators due to no longer answering unsolicited calls (savings of 1-3 days per month)	2	-	1	3	6
Some positive impact for support staff (Receptionist, Investigator Support Assistant); instead of answering phones, they are more efficient at their job or are handling NCC paper work	-	1	2	5	8
Resource allocation the same, partially due to perceived increased number of inquiries (possible reasons include NCC)	1	-	-	1	2
There is more work because they are handling more calls and NCC paper work requires more Supervisor / Investigator time	1	2	2	-	5
No change. Everyone is doing what they did before and/or phone time savings have shifted to NCC paper work	3	-	-	-	3
Do not know or same amount of work so have not redirected any resources	8	6	10	3	27

The net staff savings for the 6 offices that realized the greatest benefit is equivalent to 5.2 FTE Investigators. The savings for the eight offices that realized benefits in support staff are difficult to quantify, because the improvement ranged from enabling Receptionists, Office Automation Assistants, and Investigator Support Assistants to do their own job better to helping support intake and/or help with NCC related forms. The team assumes that the support staff savings equate to approximately 1.5 FTE Investigators, yielding the same 6.7 FTE Investigators as described earlier.

One District Director commented that it is difficult to assess the NCC’s overall impact because of possible confounding factors. As reported, this is partially because offices have no baseline data on number of calls or volume of email and regular mail. As a result, there are no objective data describing the NCC’s impact on the workload in the field. In this district, offices were unable to handle their call volume, which resulted in many unanswered calls or people calling the office again. The NCC is picking up the slack on the unanswered calls, but since those calls were not absorbing office resources, the NCC has not significantly freed up staff members to perform additional duties or reduce assigned workload.

Investigator Work

During field site visits, Investigators indicated they still have the same duties as they did before NCC implementation, assertions that have been confirmed by Enforcement Managers who

reviewed the specific duties and Attorneys who said the Investigators have no more time since NCC implementation. Attorneys who spoke with the JPS team indicated that the quality of cases has improved over the past five years, but there are no data suggesting that this is attributable to the NCC.²⁴

Some survey respondents commented that the NCC has not reduced their workload. Employees in focus groups and survey respondents indicated that one reason may be that the NCC is providing only limited support by taking phone messages and relaying information unless the call is blatantly non-jurisdictional. Survey respondents commented that the NCC functions like a glorified answering machine.

Comments by Investigators and other staff that the NCC has not created additional time for investigations may suggest a lack of communication about expectations related to the NCC. A main purpose of the NCC was to relieve Investigators from answering unsolicited calls, which was expected to increase time available to conduct investigations – not to relieve staff of intake duties. As shown in Table 19 above, six respondents to the director survey reported that Investigators are no longer answering and/or returning unsolicited calls.

However, even with the support of the NCC, one office is still receiving around 100-115 pieces of direct mail inquiries a week, 45-50 EAS/GroupWise emails from the NCC, 60-80 messages on their phone intake line a week, and an untracked number of calls on their public telephone number. If an average intake inquiry takes 45 minutes, they estimate that Investigators would spend 25% of their time on intake; and management estimates that it actually takes over 30%; therefore, Investigator workload remains high. The JPS Team has no empirical data with which to judge changes in workload. At the sites the team visited, Investigators indicated that they are no less busy now than prior to the NCC. One of the Regional Attorneys noted that the Investigators need more people and relief on their workload, and that there is presently hostility because Investigators perceive that the NCC is receiving a high amount of money when money is tight.

Other Staffing

Attorneys reported that they performed their own clerical work because some of their support staff are helping with intake (answering phones and other duties), which they anticipated the NCC would handle. Some offices report no noticeable change in workload for Office Automation Assistant and Investigator Support Assistants and the Secretaries/Receptionists indicate new duties as result of the NCC, such as downloading the EASQs and GroupWise emails and tracking disposition.

²⁴ As described in the Methodology section, the data to analyze NCC impact on case quality had major input errors on one of the critical variables, rendering results unreliable and invalid.

2. The NCC is creating inefficiencies by duplicating/creating more work for offices in the field and/or performing insufficient screening.

Duplicating Work

The NCC is collecting and forwarding basic information on the EASQ to the EEOC offices. Intake employees are repeating some of the process, which is causing a duplication of work. Office supervisors and survey respondents reported that they have to start the intake process over and obtain basic information from PCPs who call or come to their office through the NCC. One office has started screening all NCC contacts for all EEOC jurisdictional issues because it does not appear as though the calls are screened by the NCC. One respondent to the director survey wrote:

“The NCC has actually increased the work for [this] office by taking duplicate calls, capturing and forwarding incorrect information about the individual’s contact information and providing incorrect information to callers.”

The NCC also creates duplicate work when it does not sufficiently crosscheck the IMS, which occurs for the EASQs as well as the GroupWise emails. One director explained that often the “Notes” section in the IMS may already contain information stating that the office has left a message for the PCP when the office receives a GroupWise email that no one has returned the PCP’s calls. As one respondent to the director survey wrote:

“It seems like a duplication of effort when we have made contact with a PCP [to] then get information from the NCC that we need to call the person (who has already been called).”

As described above, some survey respondents and employees in focus groups in several offices reported that the NCC is not checking to determine whether an individual has an existing charge or looking up case status. Thirty-nine percent of survey respondents involved in intake reported that many (more than twenty percent) of the EASQs that they review are for PCPs who already have an inquiry in the IMS and therefore should not have been forwarded as an EASQ. This duplicates work and frustrates the Investigators when they invest time discussing the potential charge and then, upon entering the inquiry in the IMS, discover that another Investigator had already entered the information a week earlier. Of the 238 survey respondents involved in intake, 46 percent reported that many of the GroupWise emails that they reviewed were for people inquiring about charge status, which could possibly have been resolved at the NCC. The 2003 Assessment Report indicated calls related to case status as one of the types of calls that the NCC could handle; however, to ensure CP privacy, NCC business rules require that the CP provide the EEOC charge number and one other piece of identifying information. This means that CSRs should forward some calls inquiring about case status to the EEOC office for handling, but because CSRs think that they must have a charge number to look up a case in the IMS, they do not use the IMS to identify whether callers have previously filed an inquiry with the EEOC.

Creating More Work

The NCC may be creating more work for EEOC employees under the current processes. During JPS Team site visits, office managers and supervisors reported that the NCC has created another avenue for customers to complain if issues are not handled as quickly as they think they should or if they do not agree with the determination. This results in offices having to reopen previously closed cases. Twenty-seven percent of survey respondents involved in intake reported that many (more than twenty percent) of the GroupWise emails that they reviewed were complaints about the processing or outcome of a closed case. Employees commented that callers appear to perceive the NCC as another avenue to contact the EEOC, often creating more work. One survey respondent wrote:

“A CP that is not satisfied with a Predetermination interview or anything else the field office does, simply calls the NCC who now generates a customer complaint [that the field is already aware of] but now must [stop other work and] respond to within 48hrs.”

In addition, by not fully disclosing their role in the intake process, the NCC may be creating confusion about the difference between the NCC and EEOC. For example, one comment in the responses to our office director survey explained that a CP would often call the Investigator, leave a voice mail message, and then dial the NCC. In a similar vein, 42 percent of survey respondents indicated that many PCPs they talked with had the impression that they filed a charge with the NCC. One office is trying to eliminate this confusion by requesting that staff discuss the NCC’s role during charge counseling to assure the CP that the NCC is part of the EEOC.

Table 20. Field Staff Opinion about whether Potential Charging Parties Thought they Filed a Charge with the NCC

Potential Charging Parties who thought they Filed a Charge with the NCC	Percent of Survey Respondents
None	33
Relatively few (1-20%)	25
Relatively many (>20%)	42

Focus group participants indicated that some PCPs do not want to answer questions from Investigators because they already gave most of the same information to the NCC and ask why they had to talk with the NCC. This perception by PCPs can affect Investigators and the PCP because it takes Investigators extra time to backtrack and explain the limited role of the NCC. Survey respondents wrote that CPs indicate frustration when they have to retell their “story” to another person.

NCC Screening

The field survey respondents indicated that the NCC is screening out many non-jurisdictional cases. Table 21 shows that the NCC is effectively screening most of the categories listed. For example, 62 percent of respondents (involved in intake) said that no EASQs inquiring only about

age discrimination were from people less than 40 years old, and were therefore appropriately screened; however, screening related to the EEOC bases of discrimination shows that 38 percent of respondents indicated that many of the EASQs they received should have been screened out. This number may be somewhat high compared to the other categories if survey respondents indicate that the basis recorded on the EASQ was incorrect (one office indicated that it looks like the CSRs are randomly picking a basis). In support of these survey responses, the JPS Team observed that CSRs read the list and let the caller pick the issue, often without asking why the caller thought the basis was discriminatory (for example, if age discrimination, the CSR often does not ask the person’s age/date of birth).

Table 21. Effectiveness of NCC Screening for Non-Jurisdictional Calls

Categories the NCC is Screening	Percent of Survey Respondents Believe		
	All EASQs were appropriately screened	A few EASQs should have been screened out (1-20%)	Many EASQs should have been screened out (>20%)
Not job related	43	36	21
Federal complaints	67	27	6
Not national origin, race, sex/gender/pregnancy, religion, age, color, disability or retaliation	27	35	38
Company with 14 or fewer employees	43	41	16
Age only and in companies with 19 or fewer employees	63	26	11
Age only and less than 40 years old	62	27	11

A few survey respondents also commented that it would be helpful if the NCC would screen out or identify repeat callers and frequent filers.

3. EASQs and GroupWise emails provide limited useful information.

The EASQ was designed to provide only basic information to submit an inquiry to the EEOC, including who, what, where, when, and why a PCP believes an action was discriminatory. Its purpose is to provide intake staff sufficient information to prepare for the formal interview, not to relieve field staff of intake responsibilities.

During the pilot phase of operations, the number of EASQs sent by the NCC to the EEOC offices has continued to increase. One year after implementation, the number of EASQs has more than doubled since the NCC’s initial month of full operations.

Table 22. Number of EASQs sent to EEOC Offices

Month/Year	No. EASQs sent to EEOC Offices
April-05	1,979
May-05	1,676
June-05	1,923
July-05	1,748
August-05	1,950
September-05	1,578
October-05	1,612
November-05	1,788
December-05	1,843
January-06	2,668
February-06	2,472
March-06	3,821
April-06	4,276

Inaccurate or Incomplete EASQs

The EEOC Project Manager encourages EEOC staff to report any NCC related problems to him or his staff. He indicated that he often works with field management staff to handle complaints regarding accuracy of EASQs. OFP reported that EEOC staff forward misdirected EASQs, misspellings, and any other problems to Headquarters and the EEOC Project Manager discusses them with NCC managers. These NCC Managers counsel CSRs who have made errors.

Survey respondents commented in February that NCC forms often have errors. Investigators from one office agreed that EASQs are “threadbare” (inaccurate and/or incomplete) 85 percent to 95 percent of the time. One Office Director wrote:

“More often than not, there are major errors in the information that has been provided by the NCC. Just two examples: 1) Shondra Weager is really Sondra Yeager. 2) PCP’s Religion is Musselman. There are so many more examples. Addresses, telephone #s, and general information are often incorrect. We spend numerous hours receiving, responding, correcting and then re-entering information from EAS to IMS.”

During the JPS Team’s focus groups, intake staff from several different offices reported that the NCC usually provides the name correctly, but that sometimes the phone number is wrong and that they often receive little useful information on the form.

Inaccurate or incomplete EASQs may limit the extent of their usefulness. Survey respondents indicated that they use varying types of information on the EASQs, which may be related to inaccurate and incomplete EASQs and/or different intake methods in respective offices.

Table 23. Extent Intake Staff Uses Information on the EASQ

Information used on the EASQ	Percent of Survey Respondents
User information	73
Employer information	57
Complaint information	61
Never use the EASQ	24

As shown in Table 24, survey respondents reported that many of the EASQs are inaccurate, thus requiring more work by the EEOC office to fix the error. Twenty-four to forty percent of survey respondents involved in intake reported inaccuracies on many of the EASQs they reviewed over the previous three months.

Table 24. Inaccurate EASQs

Types of EASQ Information	Percent of Survey Respondents Believe		
	All EASQs were accurate	A few EASQs were not accurate (1-20%)	Many EASQs were not accurate (>20%)
User Information			
Name	38	36	26
Address	35	35	30
Zip code	40	36	24
Phone number	38	38	24
Employer Information			
Full name	25	35	40
Full address	24	36	40
Complaint Information			
Description of action against person in the Complaint Information section was not employment related	38	37	25
Issue in the Complaint Information section was not one of the bases covered by the EEOC	29	41	30

Focus group participants in four of the seven offices that the JPS Team visited indicated they receive many incomplete EASQs. Survey respondents reported that they receive incomplete PCP information, employment information, and details about the basis of discrimination. As shown in Table 25 below, 25 percent to 47 percent of the survey respondents involved in intake

reported that many of the EASQs that they have reviewed over the previous three months are incomplete.

Table 25. Incomplete EASQs

Types of EASQ information	Percent of Survey Respondents Believe		
	All EASQs were complete	A few EASQs were not complete (1-20%)	Many EASQs were not complete (>20%)
User Information			
Name	51	24	25
Address	36	30	34
Zip code	37	32	31
Phone number	40	31	29
Employer Information			
Full name	23	33	44
Full address	20	33	47

The JPS Team independently audited 12 months (April 1, 2005-March 31, 2006) of EASQs sent to 3 offices to determine the accuracy and completeness of the user and employer information. The team was only able to compare those EASQs for which there was a matching record in the IMS. On average, 37 percent of the EASQs had errors in the PCP and/or Respondent fields (range 24 to 59 percent), and 20 percent of the forms had errors in just the user information fields (range 16.4 to 25.7 percent). There is no indication that accuracy has improved over time.

In addition to user and employer information, focus group participants indicated that the complaint information is often incomplete, which has led office intake staff and supervisors to suggest that CSRs need to ask a few simple questions to provide some descriptive information on the form. Employees indicated that the issue in the allegation is often not clear on the forms and there is less information than staff expected. For example, if the form indicates that the basis is race, it does not indicate why the PCP thought it was discriminatory.

As shown in Table 26, survey respondents indicated that they would particularly like to receive more information relevant to the basis for discrimination.

Table 26. More Complaint Information Desired

Complaint Information	Percent of Survey Respondents*
More details regarding what happened to the customer and why they believe it to be discriminatory	67
Specific behavior/conduct prompting the complaint	58
If the basis for discrimination is race, then provide the person's race	71
If the basis for discrimination is age, then provide the date of birth	73
If the basis for discrimination is disability, then provide the disability	70
If the basis for discrimination is retaliation, as on what basis they were retaliated	72

*Respondents checked all that apply

Focus group participants suggested that if the CSRs asked just a few questions, the Investigators could make a decision as to whether to send a questionnaire, thereby weeding out cases that will not lead to a charge. One survey respondent wrote:

“If a complaint is about national origin, do not go into race, but discuss what the issue is!!”

As reported in one site visit, as the system is presently working, the EASQs often provide less information than a typical mail receipt and require additional time for Investigators to resolve the inaccuracies.

Validating the above EEOC staff observations, while monitoring calls at the NCC, the JPS Team observed that the CSRs do little to inquire about and understand the nature of the charge. For example, if the basis that the caller selected for discrimination is age, the CSRs do not ask for age or date of birth to make sure the callers qualifies under that category. They leave it completely up to the PCP to determine whether his/her situation is discriminatory.

Additional Information Needed

As shown in in Table 27, survey respondents indicated they would like additional information on the EASQs.

Table 27. New Information Desired in EASQ

Types of New EASQ Information Desired	Percent of Survey Respondents*
Date of most recent incident of discrimination	77
Convenient time to contact the customer	56
Number of employees in company	71
Who the customer is using for comparison	61

*Respondents checked all that apply

In addition, survey respondents wrote that they would like the following new information on the forms:

- PCP’s Date of Birth and Social Security Number
- Language requirements if not English

Staff in one office stated that the EASQs are of minimal value since they do not contain sufficient information to begin an intake interview (e.g., the alleged harm, when it occurred, PCP’s date of birth, bases/issues involved, and why the PCP believes it is discrimination).

GroupWise Email Forms

The CSRs do not provide sufficient information on the nature of the complaint in the email. The GroupWise email forms only state that the PCP/CP cannot reach the office. The offices need more information, including who and when the person called, the reason they were calling, what happened when they called, and whether they called the Investigator directly. Because of this lack of information, EEOC supervisors do not know if there is a problem that needs to be corrected and what actions/procedures to correct. As shown in Table 28, more than 60 percent of the survey respondents involved in intake reported that the GroupWise emails they receive from the NCC are inaccurate and/or incomplete.

Table 28. Accuracy and Completeness of GroupWise Emails

GroupWise Email	Percent of Survey Respondents Believe		
	All GroupWise Emails were accurate/complete	A few GroupWise Emails have problems (1-20%)	Many GroupWise Emails have problems (>20%)
Accuracy	8	24	68
Completeness	12	25	63

The JPS Team analyzed NCC-related GroupWise emails to one district office for January-March, 2006.²⁵ The team was unable to assess accuracy or completeness because many of the emails related either to information not in the IMS or to EASQs that were not yet updated in the IMS. The team did, however, identify that approximately 40 percent of the emails were from PCPs who were calling the NCC before allowing offices the allotted four to six days to process the EASQ. Receiving these emails and having to track down information adds no value to the end-to-end process and creates extra work for the office staff.

Table 29. Content Analysis of GroupWise Emails

GroupWise Email Subject	Number	Percent
Transmit letter/fax/email	13	6.4
Complaints about office/Investigators	13	6.4
Language needs	5	2.4
Convey message to office (e.g., to set up appointment, change address, request forms)	11	5.4
Questions the NCC cannot answer (ADA, training, employer rights/questions, attorney questions, insist on filing charge)	19	9.3
Cannot call long distance	12	5.9
PCP/CP uses the NCC to leave message for Investigator instead of calling directly	13	6.4
Complaint — tried but cannot reach Investigator (usually do not explain what happened e.g. how many times tried, whether left a message)	10	4.9
EAS sent to wrong office (2 emails from NCC, 4 directly from other offices)	6	2.9
Case status	21	10.3
Second call before office response time elapsed (within 1-4 days of initial contact to NCC)	81	39.7
Total GroupWise Emails	204	100

²⁵ The JPS Team selected this period to ensure that findings would reflect current activities.

4. “Hot line” transfers of callers (when the date of harm is within the 60-day window of the SOL expiring) are handled inconsistently.

Procedures for callers at risk of losing their rights to file a charge (because they are close to the end of the SOL) differ from procedures for callers not at risk. When a PCP indicates a date of harm that is within a 60-day window of the SOL expiring (30 days on either side of the projected deadline for filing a charge), the CSR transfers the caller directly to the office designated to handle these “hot line” calls.

Effective January 1, 2006 two EEOC offices were designated to receive hot line transfers. The EEOC added two offices to help with these calls on April 17, 2006. The four offices are in three different time zones across the United States and each is supposed to handle calls within a designated three-hour period, starting at 8 a.m. and ending at 8 p.m. EST; however, managers in two offices indicated they receive hot line calls all day long.

To ensure only callers within the 60-day window are “hot” transferred, the EAS has a built-in calculator that automatically notifies the CSR when a caller should be “hot line” transferred to the appropriate EEOC office. When the EAS is not used, the CSRs use a desktop calculator to determine if the caller should be “hot” transferred to the designated EEOC office.

Nevertheless, one office stated that 30 percent of the calls they received from January through April were outside the 60-day window, and 5 percent to 10 percent of the calls were not truly hot line calls (PCPs were inquiring about the status of a case that had a date of harm close to the expiration window). Managers in one EEOC office said that transferring these calls outside the designated window can create unrealistic expectations on the part of the caller and create extra work for the office because employees must stop everything to address an issue that is not truly urgent.

There are presently no written procedures for how EEOC offices should handle hot line calls, and procedures vary across the offices. For example, Headquarters requires that a non-bargaining employee answer the initial call from the NCC. Three of the offices have a dedicated cell phone for the hot line calls, but in one office, the calls come in all day long on their regular office number and are answered by whoever picks up their main number. If their two extensions are busy, the call rolls to the next available person in the office. Some managers believe they are personally responsible for handling everything related to the call, which is very time consuming. Others take down basic contact information and pass the information to a bargaining unit employee to follow up.

5. Not all calls forwarded or referred to EEOC offices are related to filing charges.

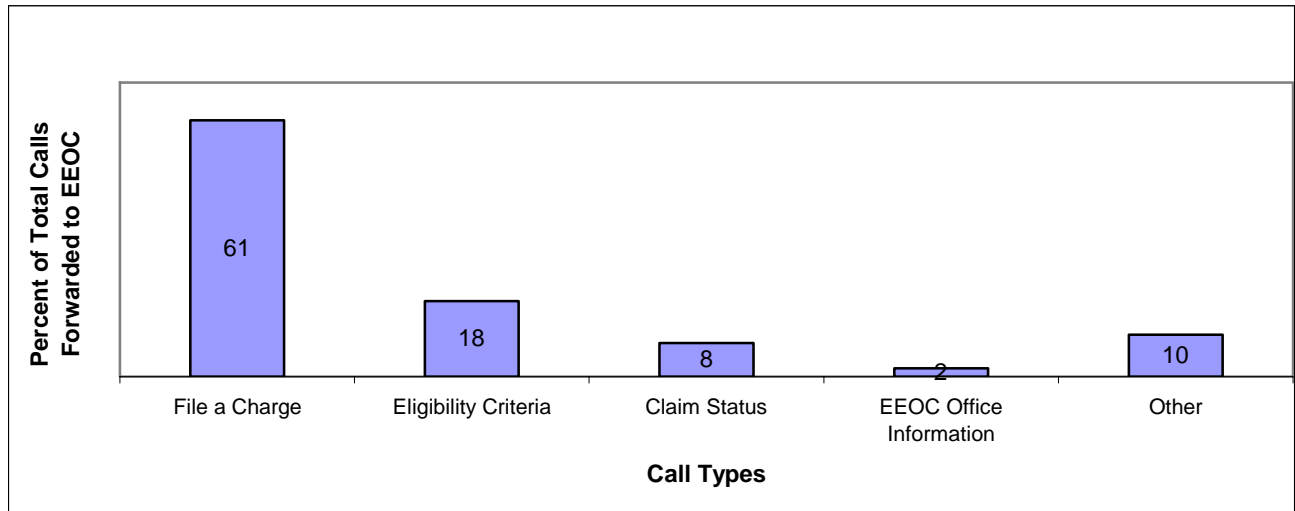
EEOC Workload

Call volumes, types of calls, and call resolution (calls handled entirely by NCC) have an impact on the EEOC’s workload. As discussed previously, current call volumes to the NCC are lower

than anticipated and are not having a major positive impact on EEOC workloads compared to EEOC expectations.

Forty nine percent of calls received by the NCC are sent (directly or indirectly referred or forwarded) to EEOC offices. Of these calls, 61 percent consist of people who wish to file a charge, and the remaining 39 percent are related to general inquiries, EEOC overviews, or questions about charge status

Figure 4. Types of Calls Forwarded to EEOC Offices



Numbers in the chart do not total 100 due to rounding.

Streamlining processes and integrating technologies can help reduce the number of calls (38 percent of all calls) forwarded to EEOC offices that are not related to filing charges.

Of the total calls forwarded to the EEOC related to filing charges, 38 percent are forwarded to EEOC offices by an EASQ and the remaining 62 percent of callers are asked to contact the EEOC office directly. When CSRs ask callers to contact the EEOC office directly, they send no information to the offices; therefore, the time spent by the EEOC in handling these calls is a duplication of work. These calls are handled by the EEOC as if they were first-time callers and all of the information collected by the NCC is collected again.

The CSRs' practice of telling people to contact the EEOC office may create problems for PCPs who visit the office and desire to file a Charge. For example, particularly in the smaller offices and depending upon the staffing and the workload, Investigators may not be available when the person shows up, wasting the PCP's time.

Overall, there remains an opportunity to reduce the number of calls sent to EEOC offices even if the volume remains constant. As stated previously, the NCC currently sends 49 percent of calls to EEOC offices. Following are areas where the NCC can further reduce these calls:

- Thirty nine percent (of the 49 percent) of calls that NCC sends to EEOC are issues not related to filing a charge.²⁶ Streamlining processes and integrating technologies would substantially reduce these calls.
- Another 38 percent (of the 49 percent) of the calls sent to EEOC offices relate to callers who inquired about filing a charge and made the first contact with NCC but were asked to contact the EEOC directly. The CSRs enter data regarding every call into RightNow software, a Customer Relationship Management (CRM) technology that documents all information related to calls. If the EEOC were to use the NCC's RightNow system, they would be able to access the preliminary information about the contact and thus reduce this duplication of work.

The NCC is not resolving as many calls as they could, and therefore is having minimal impact on EEOC workload (1,164 hours saved per month, as shown in Table 18).

²⁶ Calls where the caller wants to file a charge.

F. INTEGRATION OF THE NCC AND EEOC

Operationally, there is minimal direct communication between the NCC and EEOC field offices, as their technologies are incompatible. The NCC has provided some recent support to EEOC offices in identifying trends. EEOC staff experiences with the NCC, coupled with minimal change management practices, have resulted in unrealized expectations.

1. **There is minimal direct communication/knowledge sharing between EEOC offices and the NCC, which inhibits integration of the organizations and processes.**

Supervisors in the field indicate that they receive little or no useful information generated by the NCC, NCC processes are not transparent, and there is no process for the Investigators to feel vested in the NCC. Prior to February 2006, the only regular written communication to the field about the NCC had been a monthly report to directors (this monthly report was also sent to all staff in the field in February 2006) describing the following statistics:

- Total calls handled, average handle time, IVR calls, and other types of transactions.
- The largest number of customer contacts, the number and type of foreign language calls, peak calling time, and number of hot line calls.
- Number of EASQs sent and to which offices, the number of customer concerns/complaints forwarded to offices, and the number of people whom the NCC provided with information about contacting the appropriate EEOC office.
- Number of visits to the FAQ page on the EEOC's website and most frequently visited topics.

The EEOC circulated the inaugural issue of the EEOC National Contact Center Newsletter to all EEOC employees in February 2006. The newsletter included a section describing results to date, positive comments from a few field offices, training activities at the NCC, personal stories about two people who contacted the NCC, and a picture and short biographical description of two CSRs.

Communication exists between the NCC Project Manager at Headquarters and Office Directors, Deputy Directors, Enforcement Managers, Intake Supervisors, and a few others. One District Director said that the EEOC Project Manager often contacts them with requests for feedback. The EEOC Project Manager regularly briefs District Directors and other field personnel when they have occasion to visit Headquarters. From time to time, OFP responds to inquiries from office managers and supervisors regarding the NCC.

There is no formal process for EEOC employees to ask questions directly of CSRs or give feedback on how the NCC can better serve the offices. When a recent concern arose, one Office Director notified the district office of an urgent problem caused by the NCC but two weeks later had not receive feedback on how or whether the issue was ever addressed. To date there has been minimal direct communication between one EEOC office and the NCC when the office sent an email request for more information about incident reports, even though there was no established process for this direct communication. In another office, a manager would like to communicate directly with the NCC to ask more questions about information in

EASQ/GroupWise emails. Investigators would also like to communicate directly with CSRs rather than through the formal system (Headquarters and GroupWise Email). For example, the NCC uses the GroupWise emails simply to convey that a party is returning the call of an Investigator (perhaps avoiding a long distance call), adding a layer of communication and disrupting the normal workflow. One office director and survey respondents indicated that they believe that the NCC adds another layer of bureaucracy for customers.

Further complicating the relationship between EEOC offices and the NCC is that the GroupWise emails contain phrases suggesting that the offices are not doing their job properly. Survey respondents indicate that it appears the CSRs do not understand what is happening in the offices. Following is a written comment from one EEOC Office Director:

“The emails come through auto-assigned to wording that says the office failed to do something. The standard language is ‘fail to respond.’ This creates misunderstanding and is frustrating for the offices because usually they are in the process of trying to reach the person and for one reason or another have not yet connected. First, the NCC should cross-reference with the IMS to see what is happening on the case. The language in the form and process should be revisited.”

There is no direct communication process between the NCC and EEOC offices; most communications are presently routed through the EEOC Project Manager. This inhibits the ability of employees in each organization to understand the activities and requirements in other organization.

2. NCC knowledge about EEOC offices is minimal, and the information flow is sporadic and inaccurate.

NCC Staff Understanding of EEOC Objectives and Operations

Interviews with NCC team leaders and focus groups with CSRs revealed that there is no common understanding of the NCC’s program objectives. One Team Leader stated that the mission of the NCC is to “provide a general overview about the EEOC, information on discrimination, and forward escalations.” Another Team Leader stated that it is to “handle 70 percent of the calls that the EEOC was receiving and document the types of calls received for trending purposes.”

While these two mission statements seem similar, their focus is completely different. The first one focuses on providing general information and forwarding escalations, and therefore does not put a great deal of emphasis on documenting the call so that the EEOC can identify trends. A CSR taking direction from this Team Leader will be more focused on listening to the customer. The second Team Leader focuses on providing information and documenting the types of calls. A CSR taking direction from this Team Leader will be more focused on documenting information than listening to the caller. This presents two very different customer experiences. While these two Team Leaders have different roles, they should have the same views on the mission of the NCC. The issue is that, throughout the day, CSRs may ask questions of one or the other Team Leader and get different instructions on how to handle calls.

NCC management staff and CSRs said they had little insight into EEOC operations. They have regular visitors from Headquarters; however, few people from the field have ever visited the NCC. There are no standardized processes across the EEOC field offices. According to the team leaders, having contact with the field operations through either visits or regular phone meetings could improve the effectiveness of operations at the NCC.

NCC/EEOC Communication

Interviews and focus groups at the NCC have also revealed that the CSRs have little insight into the use and validity of information that they provide to EEOC offices. Several CSRs stated that there is no feedback from the field and that they would like to hear when there are inaccuracies in the information they send so they can make improvements. The only feedback these CSRs mentioned related to spell checks, and so they had the perception that everything else in terms of accuracy was fine, but, as discussed earlier, the JPS Team's findings contradict this impression.

3. Many EEOC and NCC technologies are incompatible, which adds to the workload of EEOC offices.

There is no integration of technologies between the NCC and EEOC. The CSRs capture a great deal of relevant information about the transaction into RightNow. If the caller wishes to file an EASQ, the CSR must transfer the information to the EEOC Assessment System (EAS). The NCC presently has "read only" access to the EEOC's IMS. This fact, combined with a lack of integration between IMS and/or RightNow and EAS, results in the requirement that EEOC staff enter information from the EASQ into the IMS.

When callers want to get a message to offices or have a complaint, the NCC puts the information into the RightNow software and then separately sends a GroupWise email to EEOC offices. The EEOC offices send information back to the NCC describing disposition of the complaint, which the NCC then records in the RightNow software. Further complicating this issue is that some EEOC offices respond to the NCC with the disposition of each specific issue, and others send back an almost automatic response indicating that the general issue was addressed. In the latter instance, the CSRs never record correct information into RightNow and never have an opportunity to understand or, if the caller contacts the NCC again, explain what is happening at the EEOC office to the customer. The two organizations are maintaining parallel information systems that are not communicating with one another.

As a result, inefficiencies exist at NCC and the EEOC. There is duplication of data entry for the NCC (RightNow and EAS), duplication between NCC and the EEOC (EAS and IMS), and the EEOC cannot see the string of information maintained by the NCC in RightNow. This causes the EEOC to have callers who have already spoken to the NCC repeat their entire story, since the EEOC does not have the benefit of information recorded in RightNow, creating a frustrating experience for the customer.

The lack of integrated technology between the NCC and EEOC has led to a duplication of work and added to the reasons that the NCC has not reduced the workload on EEOC employees. The

EEOC's Office of Information Technology (OIT) plans to develop a link between the EAS and IMS in the near future so that the EEOC's field offices will not have to continue performing double entry of data for inquiries referred by the NCC.

Escalations

The lack of technology integration also prohibits the NCC from viewing the status of inquiries until they become a charge, leading to emails that escalate issues that EEOC offices are already handling. This causes duplication of work because EEOC employees now have to attend to these emails and provide an explanation back to the NCC, which the NCC then records in the RightNow software.

As described earlier, EEOC business rules prohibit the NCC from disclosing information about charge status unless the caller can provide the charge number and one other piece of identifying information such as home address, phone number, or date of birth. During the team's site visit to the NCC, the CSRs indicated that they require a charge number to look up information in the IMS. If the caller does not have a charge number, which occurs often, the CSR must refer him/her to the EEOC offices; therefore, the NCC forwards many calls related to charge status to EEOC offices.

Communication with the staff at Headquarters indicated that the NCC has exactly the same access as the EEOC offices in terms of looking up information in the IMS, i.e., they can look up charges several different ways including by CP first and last names, Social Security Number, receiving office, and Investigator name. CSRs have the same "read" access to the IMS as the field offices, but under EEOC business rules, they are not allowed to reveal any information to callers without their charge number and one other piece of identifying information such as home address, phone number, or date of birth.

Since CSRs do not have access to any other system the EEOC uses or any way of knowing EEOC information that the EEOC has not recorded in the IMS, they sometimes send escalations that are truly duplication of work. This adds to the EEOC workload.

Integration of all of the EEOC's data systems has been a long-time goal, and the EEOC plans for integration of the EAS and IMS for late 2006. The JPS Team is not aware of any discussions to integrate the RightNow software into EEOC systems.

4. The NCC processes are not adequately set up to identify trends.

One of the NCC's objectives is to provide the EEOC with trends such as geographic and demographic information about the callers and reasons for their calls. One Office Directors reported that the NCC reports they currently receive are not much help and that they need data relevant to their region. They also indicated concern about any trends due to inaccuracies in forms they receive from the NCC. Assuming inaccuracies are corrected, the trend information the offices would like to receive is provided in Appendix I. Some of the trends directors requested are currently available by querying the IMS or in monthly NCC reporting. Some directors were not aware that they have access to some of the information that they requested.

Over the past year, the NCC has identified a new trend: the NCC forwarded pre-employment discrimination to the EEOC as a new type of call for which there was no previous information within either the FAQs or the scripts. This led to the EEOC developing FAQs for its website and scripts for CSRs.

Review of the reports generated by the NCC shows that there is no automated method to identify trends. The NCC sends monthly reports to the EEOC that are a snapshot of that month. There is no month-by-month data analysis to identify trends in terms of callers, reasons for calls, or call dispositions.

Collecting and reporting demographics were important trends cited by most of the NCC staff. CSRs collect demographic information on all calls; however, none of the reports show these data. The NCC recently began providing some demographic information, but even these reports are not set up to identify trends proactively. Even though the EEOC has identified some trends based on questions raised by CSRs, there is presently no methodology or logical approach to identifying trends.

5. EEOC employees have concerns and unrealized expectations about the NCC

Change Management

During the JPS Team's site visits, office management reported that there was not enough up-front communication about why the business decision was made to implement the NCC, so initially the role of the NCC seemed undefined. One Office Director commented that the NCC should have field staff concentrate on identifying low priority Category C cases that are usually dismissed after only minimal investigation. Identifying Category C cases before Investigators spend time investigating should increase their efficiency and effectiveness.

Survey respondents confirmed that they recollect hearing information about the goal to reduce office calls. One survey respondent wrote:

“I can't remember ever having been advised on the major goals of the NCC, other than to reduce the calls that come in to EEOC offices.”

As shown in Table 30, survey respondents indicated that they generally understand that the purpose of the NCC is to reduce call volume to offices in the field and provide general information to callers. Fewer respondents believe that the NCC is supposed to refer calls not in the EEOC's jurisdiction and less than one third understand that another purpose of the NCC is to gather trend information.

Table 30. Survey Respondents who Understand the Role of the NCC

NCC Role in Enforcement and Outreach	Percent Survey Respondents*
Reduce calls requiring field office attention	81
Provide general information about EEOC law, and potential charging party's options	83
Handle calls not in EEOC's jurisdiction	58
Gather trend information on employment issues affecting the public	31

*Respondents checked all that apply

Even though employees understand the NCC's purpose, focus group participants and survey respondents indicated that they still do not understand why the EEOC believes that the NCC is a better business decision than allocating the money to hiring staff and upgrading the infrastructure, such as the telephone technology. Field office management staff and survey respondents also indicated that it would be more helpful to have additional staff than to spend the money on the NCC.

Unmet Expectations

Office managers believe that the concept of the NCC has been "watered down" and would like confirmation that the NCC is only supposed to provide "bare bones" support.

The JPS Team's survey and interview data suggest that staff in the field expected more from the NCC than is presently being delivered. The staff may have expected more from the EASQ than it was designed to deliver. Management and staff anticipated that the CSRs would conduct more extensive screening, provide better quality of information in the EASQs/emails, and require less from field staff due to the NCC handling initial screening. They also expected that inquiries generated by the NCC would take less time and that the completed EASQ would be a step above the intake questionnaire (once the questionnaire is completed, PCPs could essentially write their own charge). Since the EEOC never meant for the EASQ to replace the intake questionnaire, some EEOC staff may have misinterpreted the reason for the EASQ.

Training

CSRs receive two weeks of classroom and on-the-job training on EEOC jurisdiction (including application and interpretation of laws enforced by the EEOC), repositioning, antidiscrimination laws, identification of issues and basis for discrimination, Title VII and other statutes, and Federal sector cases, as well as how to handle irate customers. Survey respondents indicated a belief that CSRs need more training on these issues. In addition, respondents to the director survey wrote that the CSRs need more training on the application and interpretation of laws enforced by the EEOC.

On the JPS Team's EEOC site visits, managers and supervisors indicated concern that the CSRs need to understand what they are talking about; anyone can read a script. Managers also would

like assurance that CSRs understand what they should and should not do so that they do not jeopardize the EEOC's ability to expand the charge and do not turn customers away because they do not ask the right questions.

Survey respondents also suggested refresher training on common issues such as geography; as an example of this need, CSRs have sent information to the wrong offices due to confusion of AR (Arkansas) with Arizona (AZ) and the State of Louisiana (LA) with the City of Los Angeles.

G. NCC IMPACT ON EEOC CUSTOMERS

With the launch of the NCC, customer experience has improved, particularly in areas related to access. EEOC offices have modified procedures to reflect the NCC activities, driving an increased focus on customer service. There is an opportunity to improve customer satisfaction further by streamlining existing and adding new procedures. The EEOC's Customer Satisfaction Index of 77 is strong.

1. While field office intake procedures vary, they provide timely customer service.

EEOC policy is to give offices flexibility to establish their own intake procedures that meet staffing needs and other unique demands of their respective offices. As a result, there is a wide variety of intake methods across the EEOC offices.

Walk-in Customers with No Risk of the SOL Expiring

Most offices (46) provide initial screening by an Investigator or supervisor, if available, while the PCP is in their office or later the same day, although respondents to the director survey acknowledge that this is not always possible. The remaining five offices do not have sufficient staff to see all walk-in customers, so they provide initial screening by an Investigator Support Assistant, give the PCP a questionnaire to complete, and/or make an appointment for them to return on another day for screening by an Investigator.

Telephone Calls to EEOC Offices

For people calling the EEOC office to file a charge, 39 offices provide screening by an Investigator Support Assistant or an Investigator. The remaining offices may perform a quick screening by the Receptionist and then send an intake questionnaire and/or have an Investigator return the call within 24-48 hours for more thorough screening.

2. Post-NCC, service to customers has improved in some areas.

NCC as a Customer Service Initiative

Respondents to the office director survey reported best practices related to the NCC including tacking all NCC forms, making personal telephone calls to NCC contacts and in one instance, ensuring customers are called and information is entered into the IMS within 24 hours after receipt. According to one District Director, the NCC has institutionalized the delivery of customer service, and now the customer service orientation happens every day; rather than being a one-time initiative. For example, before the NCC, Investigators in one office would take up to eight workdays to respond to an inquiry. Now Investigators in that office are required to make two attempts to contact the PCP within 48 hours after receiving the EAS, each at different times of the day (e.g. morning and afternoon).

Foreign Language Service

The NCC provides multi-lingual availability on the initial call. Spanish speaking customers can immediately reach someone who speaks their language and are given the direct line of the bilingual person in the EEOC offices, adding focus to the outreach and supporting underserved populations. In the future, the NCC's multi-lingual service could potentially help Investigators with translation services.

Complaints about Offices

Though offices can accept collect calls to ascertain callback information and then return the call, some offices reported that no longer having a toll-free number is a concern, since some customers do not want to pay for or cannot afford to place a long distance telephone call. This issue is relevant to investigations and litigation. Several survey respondents commented that not having access to a toll-free number has created a barrier between the EEOC and CPs because of the long distance expense. One Office Director reported no differences in general complaints pre- and post-NCC, mostly due to antiquated telephone technology.

OFP is exploring the feasibility of establishing unpublished toll-free telephone numbers for use by CPs and witnesses involved in cases. OFP is presently evaluating the cost and potential impact on the NCC.

3. While offices have different intake procedures, some say they have modified and improved their procedures because of the NCC.

With the NCC as the initial step in the intake process, offices have reviewed their intake procedures and provide back-up systems to front line people, creating an employee sense of urgency in responding to the public.

Offices have also improved the method by which they track PCPs by recording receipt and disposition of EASQs and GroupWise emails, either in an electronic (IMS and/or the GroupWise log assignment system) or paper form.

4. Customers have significantly improved access to the EEOC.

Launching the NCC has added the following new channels (ways) for customers to contact the EEOC:

- English Line
- Spanish Line
- Tele Interpreter
- TTY Line
- Web Inquiry
- Email
- Fax
- Written Correspondence

EEOC employees report another benefit of the NCC is that customers have access to a live person on their initial call for more hours of the day rather than having to leave a voice mail and not receiving a return call until the next day. In addition, each PCP immediately hears from an office by phone or mail.²⁷ CSRs can also listen to callers who want to vent their frustrations. The team identified an opportunity to improve the average speed of answer, as the contractual metric of answering 70% - 80% of the calls in the first 30 seconds was only met 5 out of the past 8 months.

The improvement in customer access is limited to those customers contacting the NCC.

5. Customer experience is not consistent when they call the NCC. It depends upon the CSR reached.

Customer Experience

Due to the lack of integrated procedures, customers may sometimes end up confused about their interaction with the NCC. For example, when customers call the NCC, they do not understand that it is a separate organization; they perceive their communication as ‘contacting the EEOC.’ If the transaction is not properly documented and not everyone (within the EEOC and NCC) interacting with the customer has access to that information, there may be possible lost customer information or confusion about the charge filing status. As described earlier, callers who explained their situation at length to a CSR have indicated to Investigators that they are confused about having to repeat the same information.

Differences in how CSRs view their roles also create a widely varying customer experience. Some CSRs believe their role is to act as a sounding board and listen patiently to the callers about their discrimination stories while others think their role is to take the preliminary information and move on to the next call. Those who feel they have to listen to the customer are patient and attend to all details, focusing on the customer. This provides a very different customer experience from a caller who reaches a CSR who is solely focused on collecting initial information.

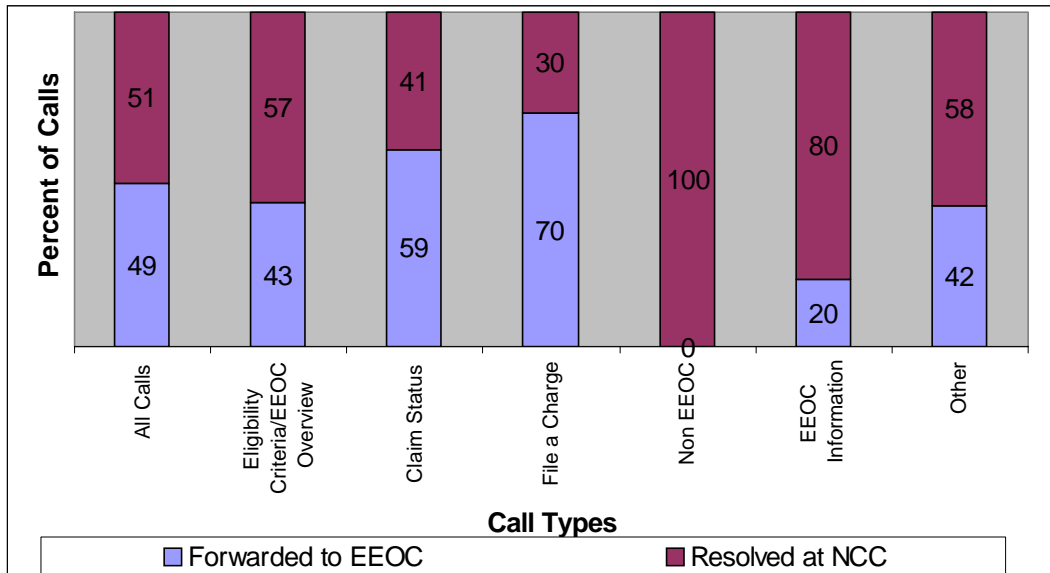
While monitoring calls, the JPS Team noticed that some CSRs were empathetic and patiently listened to their customers. Other CSRs were focused on capturing and documenting information and not on listening to the caller. The latter experience, as we observed, felt as though the phone call was just a routine process to fill out a form.

Customers calling for general and/or EEOC overview information also have varied experiences, depending on their particular questions. If the CSR is able to locate the answers easily, he or she gives the customer the information and the process ends; however, if the CSR is unable to locate the answers easily, he or she asks the customer to call the EEOC office directly, at which point the experience becomes the same as pre-NCC.

²⁷ The NCC requirement is that offices respond to EASQs and GroupWise emails within four to six days; some offices have an internal requirement to respond within 48 hours.

Figure 5 shows the types of calls received by the NCC and where they ended (EEOC offices or NCC). The NCC could handle all of the calls related to Eligibility Criteria, Charge Status, and Filing a Charge, but, as can be seen in Figure 5, the NCC is handling only a portion of these calls. For example, only 57% of the calls relating to EEOC overview and/or eligibility criteria are completely answered by CSRs; the remaining 43% are asked to contact an EEOC office.

Figure 5. Call Types by the Organization that Resolved the Call



Customers calling to file a charge also have varied experiences. Some CSRs lead customers to fill out EASQs, while others lead customers to contact the EEOC office. Only 35 percent of the customers who called to file a charge actually completed the EASQ. All they have to do after the call is wait four to six days for a contact from an office. The remaining 65 percent were asked to contact the EEOC office directly. These customers must continue to try to contact an EEOC office and find someone to help them.

These customers may believe that they have filed a charge with the NCC. According to the customer satisfaction survey conducted by CFI (Claes Fornell International) Group in February 2006, 34 percent of the respondents indicated they thought they had actually filed a charge because of their communication with the NCC.

OFP recently advised the JPS Team that they had changed CSR scripts to include language advising callers that they cannot file a charge over the telephone. The JPS Team listened to call records from the NCC and did not hear a CSR convey this information. This may be because CSRs sometimes do not follow the correct scripts, as reported during the live call monitoring (discussed later).

Customers who do not complete the EASQ have to contact the EEOC offices directly. Their experience would be no different than it would have been pre-NCC, e.g., calls not answered by a live person, mailboxes may be full, etc.

6. Call handling methods are usually consistent, but not soft skills.²⁸

CSRs are given call flows for public and private sector calls, and they consistently follow them; however, the soft skills side of handling calls is not consistent (e.g. courteously answering questions while maintaining call control, asking the right questions depending upon the customer tone, and steering the conversation). For support professionals, soft skills refer to anything that falls outside of the traditional product and development skill set. Soft skills are the ability to communicate effectively, present ideas, solve problems, and provide excellent customer care.

Some CSRs are patient, listen to the customer for a long time without controlling the call, while others are impatient, and cut off their callers. In both cases, the CSRs have not mastered how to control calls. The NCC has pushed for the handle time (length of the call) to be under six minutes, but provides little coaching and/or training on how to control the call. There is minimal focus on improving the CSRs' soft skills.

7. Information about general overviews and inquiries is fairly consistent and accurate; however, other specific information is not consistent or accurate.

The NCC uses standard operating procedures to update the script content, which ensures information accuracy, but there is no focus on ease of use by the CSRs.

CSRs provide customers with consistent, accurate information regarding charges and other general inquiries, but specific information relating to infrequently asked questions is inconsistent. Most CSRs perceive that they have 800 scripts to reference, but, in reality, they have a subset depending upon the type of call that they are handling. According to the Site Director, there are 400 Spanish Language scripts and FAQs and 400 English Language scripts and FAQs.

Unfortunately, in this case, perception is reality. Since CSRs perceive that there are 800 scripts, they do not take time to understand and use all of them; instead, they select a few scripts that they use most often and refer only to those for all answers. The result is that, when a customer has an infrequently asked question, some CSRs try to fit one of the answers into their most frequently used script, while others refer the customer to field offices. CSRs and one of the Team Leaders stated that the key word searches are not efficient; for example, during a side-by-side observation, one CSR said that when she typed 'Right to Sue,' nothing appeared.

8. The Customer Satisfaction Index is very strong.

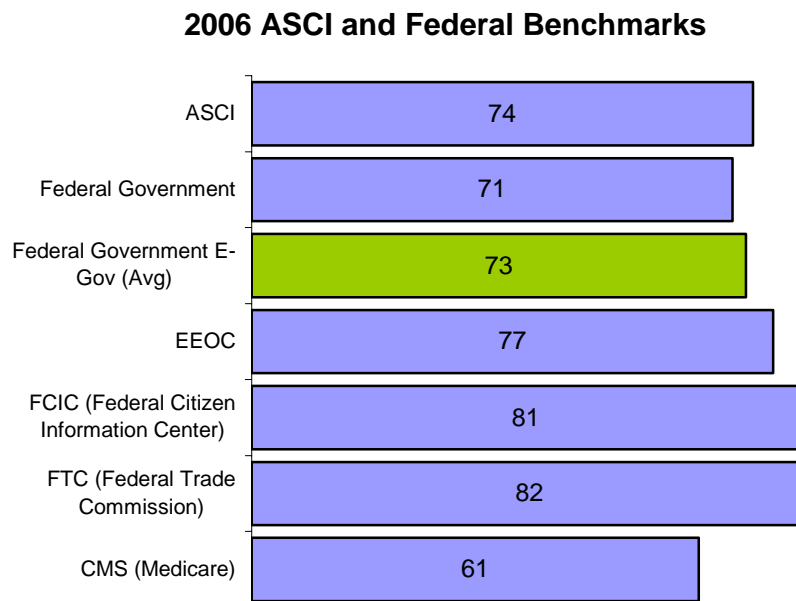
The EEOC recently contracted with CFI Group to collect customer satisfaction data on NCC calls. According to the results, the overall Customer Satisfaction Index is 77. The JPS Team conducted a benchmarking analysis by comparing this index to the American Customer Satisfaction Index (ACSI) scores for the Federal government. The overall Federal government score ranges from the high 60's to low 70's. A few low 80's exist, but they are rare, making the

²⁸ Soft skills relate to the manner in which a CSR handles a transaction, such as professionalism in handling the transaction, controlling call flow, taking ownership of the call, and being empathetic with the caller. Hard skills are skills related to the product; in this case, understanding and knowledge of EEOC laws.

EEOC's score of 77 relatively strong. Service industries in general tend to score in the 70's, unless they are premier companies (e.g. Nordstrom's or LL Bean) that base their overall reputation on a superior service model. For comparison purposes, the overall ACSI score across numerous service industries stands at 73.5 through the fourth quarter of 2005, putting the EEOC above both the national average and the average for the Federal government.

As shown in Figure 6, the EEOC's Customer Satisfaction Index of 77 is above the satisfaction indices for the total Federal government and the overall ACSI Index. Calls coming into the NCC are more comparable to calls coming into Federal Trade Commission (FTC) and Federal Citizen Information Center (FCIC) than CMS-Medicare, and the EEOC's score is less than those two indices.

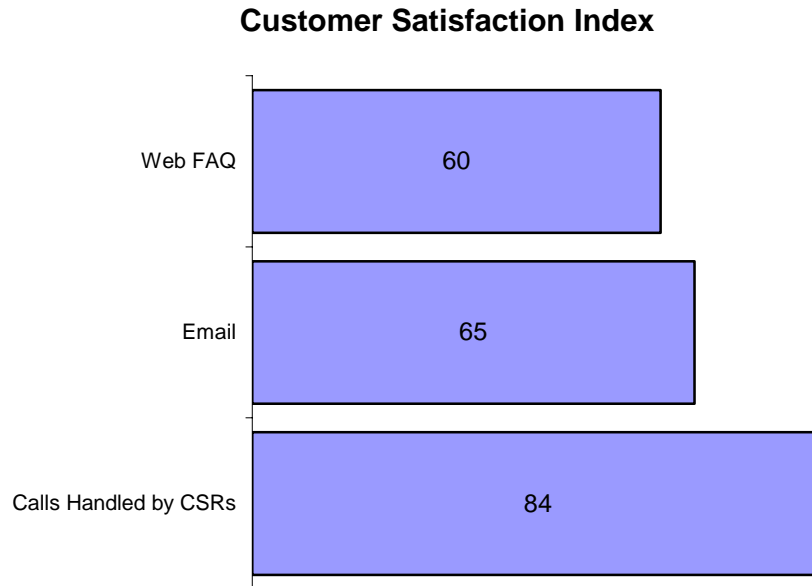
Figure 6. 2006 ASCI Index and Federal Benchmarks²⁹



The satisfaction index for other forms of correspondence is significantly lower than the satisfaction index for calls.

²⁹ Customer satisfaction indexes were only available for FCIC, FTC, and CMS

Figure 7. EEOC Customer Satisfaction Index



In summary, the overall Customer Satisfaction Index for the EEOC is 77, higher than some Federal agencies. The satisfaction index varies by channel,³⁰ with the web channels having significantly lower scores. An overall score of 77 is good, but, since there are no baseline data, there is no way to know whether this is an improvement over pre-NCC.

In addition, these data reflect only the customer experience with the NCC, a narrow measure of the overall EEOC customer experience. It does not reflect satisfaction with the EEOC in general or with everyone in the end-to-end process. Examining customer experience at the NCC evaluates only the initial step in the customer experience, and does not reflect, for example, any dissatisfaction from customers who misunderstand the NCC's role. As described earlier, Investigators indicated that PCPs have thought that they filed a charge with the NCC and experienced frustration at having to repeat their information to Investigators.

9. Some of the contact center operational procedures at NCC are not optimal. This is not having a significant impact on the customer experience at the current volumes; however, with increased call volumes, customer experience can be affected.

As stated earlier, there have been changes to operating procedures at the NCC and EEOC offices since the beginning of this project. Most of the assessment of the NCC is based on the findings identified in November and December 2005.

³⁰ Type of communication, e.g. web, email, calls handled by CSRs.

Work Environment and CSR turnover rate (attrition)

The work environment for CSRs at the NCC is very good. All the CSRs have their own workstations. The floor is well lit and spacious. The team leaders are readily available to the CSRs.

The current CSR rate of turnover at the NCC is 36%. Industry averages vary by the type of industry served by the call center (e.g., technical support, customer service, and sales) and the nature of the call. According to a Pearson Study, the CSR turnover rate in Government call centers averages 29 percent.

The NCC has access to state of the art technology in terms of scheduling, forecasting, and timekeeping, but they do not use these technologies efficiently. Table 31 provides an overview of each of the relevant technologies, with in-depth descriptions below.

Table 31. NCC Processes and Technology

Process	Technology
Scheduling	Blue Pumpkin/Aspect
Time Keeping	Deltek
Call Management	Avaya – CMS
Contact Management	RightNow
General Reporting	No particular tool. NCC uses reporting from the source systems
Agent Performance Management	No particular tool. NCC uses reporting from the source systems
Call Monitoring	NICE Recording Software ³¹

Scheduling—Blue Pumpkin/Aspect

The NCC used Blue Pumpkin for scheduling purposes until recently, and are in the process of converting to Aspect. The NCC does not use all the capabilities of these technologies. Information is manually recorded on Excel spreadsheets and then entered into the system. With the current size of the NCC, this is not a large concern, but this is not an efficient way to schedule CSRs and it will pose many problems if the program expands.

Timekeeping – Deltek

The NCC uses Deltek for timekeeping purposes, but the current process requires a significant amount of manual entry and is recorded in three different places: an Excel spreadsheet, the timekeeping system, and paper copies. The NCC was unable to provide a valid reason for these manual activities. Aux codes (codes generally used on switches to track CSR time) are not used, resulting in manual tracking of CSR times. The duplication of this process adds inefficiencies to NCC operations.

³¹ NICE is not an acronym.

Call and Contact Management/General Reporting – Avaya and RightNow

The NCC does not use a special reporting tool. Reports are produced from the source systems: RightNow (CRM), Avaya (Switch), and tele-interpreter reports from the web. Reporting is provided as follows.

- Switch Reports – Daily, weekly, and monthly reports on call attributes, such as speed of answer and abandoned calls. The EEOC receives these metrics on a monthly basis. Interval reports (call metrics for every half hour) are produced and used to manage the floor in a typical call center, but these reports were not available for this program until recently.
- CRM Reports from RightNow – These reports show contact by State, channel, action taken, topic, etc. The EEOC receives these reports on a monthly basis. Analysis across months would allow the NCC to identify trends, but no such analysis is currently performed. In addition, the NCC collects demographics but did not report them until recently, when it began sending demographic reports to the EEOC; however, even these are snapshots and do not present any trends.
- Other Reports – IVR reports and reports on correspondence and emails are available.

Agent Performance Management – No tool is used

Agent performance management is not standardized. The Site Director said that team leaders and staff members have meetings once a week to discuss monitoring scores, changes, and general questions, but CSRs denied this.

CSRs also said they do not have any one-on-one coaching sessions. Their coaching is more like refresher training.

There is also no reporting relationship between CSRs and team leaders; CSRs can approach any team leader with any questions. The NCC does not use any agent scorecards or other performance metrics to review CSR performance. The only measurement used is through call monitoring, which the CSRs say they receive once every two months.

Call Monitoring

Call monitoring is an essential and important process for any call center. Call monitoring ensures consistent quality service to customers by regularly coaching CSRs on findings from call monitoring. At the NCC, the call monitoring process consists of three distinct activities: NCC call monitoring, EEOC live call monitoring, and NCC and EEOC call calibration meetings.

NCC Call Monitoring. The NCC uses two tools for call monitoring: CMS Supervisor and NICE. The NCC quality manager and supervisors monitor the calls of each CSR four times a month (as required per the contract). They use a specific form to grade each call that they monitor. These grades are then summarized and shared with the CSRs; however, according to the CSRs, information from the monitoring sessions is not consistently shared with them. During focus

groups, some CSRs said they get one form per month, while others said they have been there for a few months and only received one. There is no documented process to show that CSRs have been provided with feedback.

The quality monitoring forms include performance measure terminology that is not defined on the form. Standard definitions exist, but neither management staff nor CSRs could provide any definitions for the measures during interviews and focus groups.

EEOC Call Monitoring. The EEOC conducts live call monitoring. The live call monitoring process started in December 2005 (technology problems precluded starting earlier). The EEOC has a remote call monitoring number. Depending upon the time that the EEOC connects to the call, they could be waiting on the line for the CSR to answer as long as the caller waits, or the caller could be waiting longer. The EEOC monitors 15 to 20 calls per week, and an average of 3 to 5 calls at different times throughout the day.

When the EEOC identifies problems, they forward the information to NCC managers and supervisors for feedback to CSRs and appropriate corrective action. The EEOC Project Manager also discusses issues with the NCC content and training manager when it is appropriate to revise scripts or provide additional training. The EEOC has occasionally recommended that CSRs call customers back to correct information.

As shown in Table 32, during live call monitoring from January through May 2006, EEOC staff identified errors in technical information (e.g., errors in the law or other substantive matters) in 22.5 percent of the 285 live calls monitored. In addition, during 11.2 percent of the total calls monitored, CSRs created unnecessary barriers for customers. Following are a few examples of such barriers:

- CSRs have told callers that they cannot hire an attorney until they file a charge with the EEOC
- CSRs have told callers that certain EEOC offices are not taking calls from the public, which was independently verified as incorrect
- CSRs require the complete and exact address of the employer to proceed with the phone interview when, by EEOC regulations, the employer's address is not required to file a charge

Live call monitoring also identified an issue in the complaint policy. If customers complain three times that a field office did not contact them, the NCC must notify OFP. This has delayed filing charges for more than 34 days.

In addition, when verifying repeat callers, CSRs do not follow any "confidentiality" procedures. The CSR may read from the file and ask the caller if the address in the file is correct, rather than asking the caller to provide his/her address.

CSRs also enforce a "30 second hold rule," whereby they tell customers they cannot hold more than 30 seconds to allow the caller to retrieve additional information. The rationale is based on

the performance metric that CSRs must answer calls within 30 seconds, which is not always the case.

Table 32. Live Call Monitoring Results

Month (2006)	No. Calls	Percent of Live Calls Monitored					
		Errors in Technical Information Provided	Customer Service (CSR rude, not polite)	Complaints about Field Offices	Script not Followed	Call more than 6 minutes*	CSRs create barriers)
January	43	27.0	11.6	4.7	7.0	41.0	4.7
February	60	15.0	11.7	6.7	5.0	48.3	13.3
March	75	21.3	22.7	8.0	13.3	36.0	9.3
April	60	33.3	25.0	18.3	25.0	38.3	11.7
May	47	14.9	8.5	10.6	38.3	48.9	14.9
Total	285	22.5	16.8	9.8	17.2	42.1	11.2

*Excludes wait time. April through part of June 2006, a technology problem caused a customer to have to wait to talk with a CSR. The time ranged from 7-25 minutes. The problem has been resolved.

EEOC and NCC Call Calibration Meetings. Each week the NCC and EEOC hold calibration sessions to understand quality performance metrics. This information is then loaded to an Access database to produce reports. The JPS Team requested but did not see any examples of the quality monitoring reports, although, according to management, these reports do exist. According to the reporting analyst, there is no good reporting from this quality monitoring. The only metric that is used is the number of times each CSR is monitored.

H. SUMMARY

1. Implementation of the NCC has created some benefits, but not to the extent anticipated in the 2003 Assessment Report.

As shown in Table 33, the NCC has made some progress in a few areas toward meeting the anticipated benefits set forth in the 2003 Assessment Report. As a state-of-the-art customer service solution, the NCC provides another channel for the public to contact the EEOC and customers have reported above average satisfaction with the NCC.

The NCC, however, has not realized many other proposed benefits. As described earlier, this is partially due to the JPS Team conducting the evaluation during the pilot year of operations when new processes were being refined. In addition, initial business rules limited the calls to the NCC to only the two general information toll-free lines.

The reduced benefits are also related to operational factors. The standard forms from the NCC are often inaccurate and incomplete, causing extra work for intake staff. There has been some positive impact on Investigator work, but less than anticipated.

Table 33. Comparison of Benefits in the 2003 Assessment Report to Current Findings

	Anticipated Benefits Cited in the 2003 Assessment Report	Findings of Current Evaluation
1	Provide a centralized point of contact for the EEOC, using multiple modes of communication.	The NCC can handle calls, faxes, emails, TTY calls, and mail correspondence; however, the EEOC offices still take calls directly.
2	Improve the quality and effectiveness of customer service.	A recent study reports the EEOC’s customer satisfaction is above average, but without baseline data, there is no way to know if this is an improvement compared to pre-NCC.
3	Answer calls immediately by live bodies.	CSRs answer calls to the NCC immediately; however, most of the callers desiring to file a charge are referred to the EEOC offices, relegating them into the same pre-NCC process.
4	Spot trends and emerging issues (i.e., logging, tracking, and monitoring of inquiry nature, volume, duration and resolution coupled with extensive reporting on demographics).	NCC reporting does not show significant identification of trends. There were no monthly trending reports.
5	Meet e-government expectations.	The EEOC has implemented the NCC; however, the technology across the NCC and EEOC is not integrated, and some of the reporting at the NCC is manual.

An additional, albeit unanticipated, benefit has been that the NCC provided the EEOC with the capability to communicate with employees and PCPs/CPs after Hurricane Katrina in the Gulf States and with parties during the transportation strike in New York City in December 2005.

The pilot phase of the NCC has not resolved the question as to whether the NCC is an effective customer service solution for the EEOC, though there are some indications that it is beginning to have a positive impact. It is clear that:

- NCC operations are not as efficient or as effective as they could be, largely because EEOC and NCC systems and processes are not integrated
- The EEOC has yet to obtain many of the anticipated key benefits

The JPS Team's electronic survey, sent to all staff in field offices, provided two opportunities for respondents to write in comments. On the item that asked for suggestions to improve the NCC, approximately 18 percent of the 377 respondents writing in comments stated that the NCC is a waste of money and should be disbanded. At the end of the survey, respondents were given a final opportunity to enter any thoughts related to the NCC. Approximately 24.5 percent of the 267 write-in comments indicated that the NCC is ineffective and has not reduced workload or telephone calls, and that they would rather have more staff in the field.³² Employees also indicated that if this is not possible, it is important to improve the processes and eliminate the duplication of work. Two of the most commonly suggested methods for achieving this goal included providing training to the CSRs and ensuring that CSRs transmit more accurate and complete information to EEOC offices.

During the team's visits to EEOC offices, many managers and Investigators said that they would rather have more staff than the NCC; however, if that is not possible, they expressed a desire to make the NCC work more effectively. Respondents to the director survey suggested that the NCC issue intake questionnaires and take charges. One director wrote the following comment:

“To simply refer PCPs to servicing offices for Investigators to speak with them or to send EAS questionnaires that are not detailed enough to be considered minimally sufficient charge information is not as helpful as the NCC could/should be. If a PCP wishes to speak with an Investigator, there should be someone on staff to handle that. If they wish to file a charge, questionnaires should be mailed out with self-addressed envelope to servicing office. There is great potential for the NCC to relieve workload for field offices.”

During the team's site visit to the NCC, the managers indicated they are aware that they are not as effective as they could be (the volume of telephone calls is significantly less than they anticipated). They also indicated a desire to communicate directly with EEOC offices to learn what they can do to help the offices. The CSRs also have a keen interest in learning more about how they can better serve the EEOC offices.

³² It is possible that some responses across the two questions are from the same people.

2. NCC Costs

The JPS Team attempted to quantify the NCC's benefits; however, it is very difficult to conduct a cost/benefit analysis, since no initial business case was made for the NCC. The team developed a high-level comparison of costs (associated with the NCC's operations) with time saved at EEOC offices, but the financial element is only one component of the analysis. It is also important to understand the qualitative benefits offered by the NCC, because some of the EEOC's anticipated benefits cannot be quantified. For example, it is very difficult to quantify benefits resulting from customer satisfaction or the ability to identify trends that enable the EEOC to better serve future customers. In addition, there may be indirect savings over the current operations resulting from standardizing processes and making other improvements. The EEOC can redirect these savings to other mission critical activities, such as enhancing the efficiency and effectiveness of filing charges and the quality of investigations, mediation, and litigation, as well as preventing discrimination through outreach and training.

The team estimated the amount of time the NCC is saving EEOC staff by combining the resolution rates estimated from its call observation analysis, average talk time from NCC reports, and the number of worked hours. Based on this estimation, the NCC is currently saving the EEOC approximately 13,964 hours per annum, the equivalent of 6.71 FTEs. The value of the current savings is \$489,830.³³

Following are the NCC costs for taking calls in English, Language support, and TTY.

Table 34. Costs of Calls Handled by CSRs

Description	Costs
English Calls	\$1,145,300
Language Support	\$82,109
TTY Calls	\$3,802
Total Cost for CSR-Handled Calls	\$1,231,212

³³ Based upon an Average Investigator FTE equal to \$73,000 (excluding benefits).

IV. RECOMMENDATIONS

The JPS Team believes that the NCC has the potential to make a significant contribution to the EEOC; however, as presently operated, it is not effective. The team recommends that the EEOC continue with the NCC, but only if significant changes are made to improve call volume, optimize customer satisfaction and operational efficiencies, measure on-going performance, and ensure readiness for the future.

The JPS Team's study found that the NCC is not achieving many of the benefits originally anticipated in the 2003 Assessment Report, partially due to business rules developed after the Report was created, which has led to a call volume that is much less than originally estimated. The NCC has freed up some field staff time, but not to the extent anticipated. Significant issues remain concerning the quality and value of the information that the NCC provides to the field; therefore, the team believes that it would be a mistake for the EEOC to simply renew the contract and continue current operations.

One option is for the EEOC to abandon the NCC, as some of the changes that the team recommends will require the EEOC to commit time and resources to achieve a successful outcome. The largest negative result of eliminating the NCC would be its impact on customer service. The largest positive impact of eliminating the NCC would be that of potentially freeing up money for other uses, including upgrading telephone technology in field offices, hiring more professional staff to help with investigations, and hiring more clerical staff to help answer unsolicited telephone calls and perform other intake duties.

If the EEOC does not hire additional staff and does not upgrade telephone technology, customer service may deteriorate to conditions at the time of the 2003 Assessment Report. Calls may be dropped, customers may have to leave a voice mail message and wait to have their questions answered, and customers will have fewer hours during the day to talk with an EEOC representative. Further, office efficiency and effectiveness may suffer if professional staff is again required to support clerical staff, diverting them from other mission critical tasks. As a result, office complaints may increase, which will take more time from Office Directors. In addition, the ability to quickly identify and react to trends may be limited.

Recommendations to Improve Operations Quickly

- 1. Increase the NCC's call volume by routing all initial calls through NCC and increasing customer awareness.**
 - a. Route all initial calls through NCC.**

One of the main reasons that the NCC is not having a more significant impact on the EEOC's workload is low call volume; to increase this volume, the team recommends that the EEOC route *all* unsolicited calls to the NCC. This would involve making local numbers available only to people who have existing relationships with the EEOC offices. The purpose is to reduce call volume to EEOC offices and lighten the workload. This

would also ensure that callers have a similar customer experience, since services provided by the NCC are regularly monitored for quality service. Customers calling about matters related to existing charges and cases would still have the local office telephone number and continue to be able to reach the appropriate person directly.

b. Develop methods to increase awareness of NCC.

Increasing public awareness of the NCC would likely increase NCC call volume. The planned advertising campaign will be important to increasing awareness of the toll-free number, and plans to implement this campaign in early July should proceed.

The EEOC should update its marketing plan (National Contact Center Outreach Plan updated February 28, 2005) to incorporate planned activities for the current and upcoming fiscal years. The EEOC should also track this document for progress. In the present version, action items have an “end date,” but it is not clear whether those action items have been implemented. One item is indicated as “done”, while the others simply state dates, and not whether they have been completed.

The EEOC should also modify its home page to display clearly the NCC’s importance and relevance to customers. The website presently shows the NCC under the banner and under the link for “Contact Us.” Showing customers the benefits of contacting the NCC will encourage them to do so.

It is important that the EEOC follow through with GSA to ensure that all telephone directories list the toll-free number as the EEOC contact number. The team recommends that the EEOC consider publishing only the toll-free number in the blue pages. Offices or the NCC can give the local number to CPs and other customers who have existing relationships with local offices. If this is not practical due to other policy decisions, it is essential that all technology, including the NCC’s RightNow software, be integrated to ensure smooth operations.

Table 35 shows some assumptions and projected possible future call volumes and benefits of routing *all* unsolicited calls through the NCC. The only financial cost to implement this recommendation relates to the advertising campaign to increase awareness of the NCC.

Table 35. Potential Savings Due to Increased Call Volume

Factors	Current	Best Case (100%)	Most Likely (50%)	Worst Case (25%)
Annual call volume	273,804	547,608	410,706	342,255
NCC resolution rate*	51.0%	51.0%	51.0%	51.0%
Total calls resolved	139,640	279,280	209,460	174,550
Call duration (minutes)	6	6	6	6
Total hours saved per year	13,964	27,928	20,946	17,455
FTE saved per year**	6.71	13.43	10.07	8.39
Value of FTE	\$73,000	\$73,000	\$73,000	\$73,000
Annual Savings	\$490,083	\$980,166	\$735,124	\$612,604
Improvement	NA	100.0%	50.0%	25.0%

*Rounded to the nearest tenth of a percent.

** Rounded to two decimal points

2. Improve call resolution at the NCC by clearly defining the NCC’s role. The NCC should make an effort to train the CSRs to more effectively screen and take information from Potential Charging Parties, including asking initial basic questions.

The NCC and EEOC should clearly define their respective roles and responsibilities. At a high level, the NCC should provide the primary customer contact until an Investigator is assigned to the case; then the EEOC should be the primary contact.

The NCC should also train CSRs to ask effective initial questions so that they can screen out cases that clearly do not have a basis of discrimination. The JPS Team recommends that the NCC devise a pilot program in collaboration with a few offices. The offices should detail an Investigator to the NCC to coach the CSRs in regards to relevant questions that will allow CSRs to screen more effectively and send fewer calls to EEOC offices. The Investigators should then evaluate and be ready to intervene as needed in calls to their office. The EEOC should develop methods to document CSR effectiveness in this additional screening. If CSRs can attain a high, consistent level of performance, then the EEOC should expand the pilot program throughout the organization.

Table 36 shows the assumptions and possible improved benefits if the NCC fully implements this recommendation. Training the CSRs is the only cost to implement this recommendation.

Table 36. Improvements in EEOC Workload Savings Due to Improved Call Resolution

Factors	Current	Best Case (15%)	Most Likely (10%)	Worst Case (5%)
Annual call volume	273,804	273,804	273,804	273,804
Additional calls resolved due to increased resolution	NA	5,298	3,532	1,766
Additional time saved	NA	1,325	883	442
Total hours saved per year (13,964 base plus additional time saved)	13,964	15,289	14,847	14,406
FTE saved per year*	6.71	7.35	7.14	6.93
Value of FTE	\$73,000	\$73,000	\$73,000	\$73,000
Annual Savings	\$490,083	\$536,568	\$521,073	\$505,577
Improvement	NA	9.5%	6.4%	3.3%

* Rounded to two decimal points

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

Only 66 percent of calls not related to filing a charge are resolved at the NCC. Integrating processes and technology would afford an opportunity to increase the resolution of this call type as well as provide qualitative benefits such as reduce duplication of work and increase efficiency.

From a field operations perspective, the two organizations are operating in parallel and nearly autonomously from one another. The NCC and EEOC should use the same or integrated technologies to capture and maintain customer information. This would include integrating the NCC's RightNow technology with the EAS and the IMS, and to the extent possible, the GroupWise email system. Making information transparent across the two organizations will promote communication and enable a more effective customer experience. Customers should not perceive a difference between the NCC and EEOC when inquiring about issues.

The EEOC should also develop processes for regular, direct communications between EEOC offices and the NCC. This will provide each group with a better understanding of the other and help sustain an ongoing working relationship to resolve issues at the "local" level before they become problems that require intervention from Headquarters.

The NCC and EEOC should set up a process for EEOC offices and the NCC to regularly share knowledge, communicate questions, and provide feedback. This could include periodic meetings, designating CSRs to be responsible for coordination and communication with certain districts/offices, and/or other means of exchanging information, such as participating in each other's staff meetings. The NCC should be treated as an extension of the EEOC offices. One model that can be tested is assigning a single point of contact from the NCC to a group of offices.

Integrating processes across the two organizations as well as regularly sharing knowledge and information will help the NCC employees feel more a part of the EEOC and help them resolve more calls because they will better understand field office operations. In typical call centers, when CSRs have an understanding of how they contribute to the sponsor’s success, they gain a sense of brand loyalty to that organization rather than to the call center operator.

The following table shows the potential benefits of integrating technologies and processes. The benefits shown here are only the portion that could be quantified. Other benefits, such as improved customer satisfaction and improved efficiencies, cannot be reliably quantified at this time.

Table 37. Improvements in EEOC Workload Savings due to Improved Resolution in Calls not Related to Filing a Charge.

Factors	Current	Best Case (15%)	Most Likely (10%)	Worst Case (0%)
Annual call volume	273,804	273,804	273,804	273,804
Calls resolved due to increased resolution	139,640	153,604	146,622	139,640
Total hours saved per year	13,964	15,360	14,662	13,964
FTE saved per year*	6.71	7.38	7.05	6.71
Value of FTE	\$73,000	\$73,000	\$73,000	\$73,000
Annual Savings	\$490,083	\$539,091	\$514,587	\$490,083
Improvement	NA	10.0%	5.0%	0.0%

*Rounded to two decimal points

Summary – Recommendations 1-3. Each of the above recommendations provides opportunities for the EEOC to improve call volume and operating efficiencies. The team expects the current year call volume will continue if the NCC continues as it is currently operated.

The team made some assumptions to estimate the possible improvement in number of staff hours saved for the EEOC if all of the above recommendations are implemented. As shown in Table 38, there are synergistic benefits to implementing recommendations two through four. The team’s estimate shows that the NCC can save the EEOC between 23,705 hours per annum (possible worst case) to 56,164 hours per annum (possible best case), or from 11 to 27 FTEs,³⁴ respectively. This is an improvement over the estimated savings in the 2003 Assessment Report (43,224 hours per annum, which equates to 20.73 FTEs).

³⁴ The team divided the total hours saved per annum by 2080.

The quantifiable benefits of implementing all of the above recommendations might increase the likelihood of obtaining the savings estimated in the 2003 Assessment Report. There will also be non-quantifiable benefits, such as customer satisfaction.

Table 38. Quantifiable Benefits of Implementing Recommendations One through Four

Factors	Current	Best Case	Most Likely	Worst Case
Annual Call Volume	273,804	547,608	410,706	342,255
NCC Resolution Rate*	51.0%	57.9%	55.3%	52.6%
Total Hours Saved per Year	13,964	56,164	34,715	23,705
FTE Saved per Annum**	6.71	27.00	16.69	11.40
Value of FTE	\$73,000	\$73,000	\$73,000	\$73,000
Annual Savings	\$490,083	\$1,971,142	\$1,218,360	\$831,970
Improvement	NA	302.4%	148.7%	69.8%

*Rounded to the nearest tenth of a percent.

**Rounded to two decimal points

Recommendations to Optimize Customer Satisfaction and Operational Efficiencies

After implementing the above recommendations, the following recommendations should be implemented to optimize NCC and EEOC operations.

4. Make significant changes to the operating model in order to realize any additional positive impact on EEOC operations and customer experience/satisfaction.

The EEOC should standardize the citizen contact process into one seamless process across the EEOC and NCC. Clear standard operating policies, procedures and methods should be defined and set up for each step of the process. Before implementing this process across all offices, it should be tested with a few different types of offices to identify potential gaps.

The JPS Team understands that the idea of standard intake processes across all EEOC offices runs counter to the current philosophy of allowing offices discretion in how they conduct their initial client contact and intake procedures. The EEOC could standardize the initial stages of the intake process and then give offices discretion in how they conduct the rest of the intake process. The goal is to create efficiencies in which the NCC relieves more of the clerical burden from offices than it currently does. One option advanced by survey respondents and managers during team interviews was to have the 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. The NCC could accommodate a standardized EEOC questionnaire or a different one for each office.

Longer term, the EEOC may also wish to evaluate the option of the NCC taking charges under close supervision and communication with EEOC offices. The JPS Team understands that

taking charges has been identified as an inherently governmental responsibility; therefore, such outsourcing would require careful evaluation, consideration, and compliance with all relevant regulations.

In order to evaluate, establish, and implement this and other recommendations, the EEOC and NCC should also establish a combined “EEOC/NCC Steering Committee.” This Steering Committee should have representation from all stakeholders, including the field (management and Union employees), Headquarters, and NCC. This group should establish processes to integrate the systems and procedures of the EEOC offices and the NCC, increasing operating efficiencies and improving end-to-end customer satisfaction. This could lead to an expansion of the Intake Services Workgroup if membership is broadened to include all NCC stakeholders.

5. Provide training and feedback to CSRs on soft skills³⁵ and improve the quality of information sent to EEOC offices.

CSRs need training on soft skills, which are very important in driving consistent customer experience and improved customer satisfaction. Examples of soft skills include being able to answer customer questions courteously while maintaining call control, being able to ask the right questions depending on customer tone, and steering the conversation.

CSRs also need training to improve the quality and quantity of information they provide to EEOC offices. This training should help CSRs understand the data that EEOC offices require. Providing a view into uses of the data will help CSRs understand the reasons that offices need the information.

The NCC should also provide regular feedback and mentoring to maintain high quality calls. This will indirectly influence customer satisfaction, because regular feedback and training will enable CSRs to provide consistent quality service.

6. The 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.

The NCC should set up, standardize, and automate their processes so that they are ready to handle increased call volume. The NCC should standardize operations, including workforce management, coaching, and training, to readily identify issues. Process automation and standardization will reduce the number of errors and force all CSRs to follow the same processes. This will make communication and training easier and provide a consistent customer experience.

The JPS Team rejects the notion that the NCC should expect CSRs to be proficient users of a large number of scripts in communicating with the public. As this report documents, CSRs are unable to find the right script most of the time; they instead select the handful of scripts that they

³⁵ Soft skills relate to the manner in which a CSR handles a transaction, such as professionalism in handling the transaction, controlling call flow, taking ownership of the call, and being empathetic with the caller. Hard skills are skills related to the product; in this case, understanding and knowledge of EEOC laws.

find easy to utilize and/or understand. The team recommends that the NCC create a more user-friendly engine for its knowledge base and reduce the number of scripts to those few pertaining to opening the call, closing the call, and disclaimer information. Actual product information should be available in the knowledge base. The NCC can implement this recommendation if its roles and responsibilities are clearly defined. .

Recommendations to Measure On-going Performance and Optimize Readiness for the Future

7. Develop reports and other processes to identify trends proactively.

The NCC should set up reporting processes to identify issues and trends. The NCC can accomplish this by understanding the EEOC's mission, operations in field offices, and the EEOC's need for information, and then linking these elements with information captured at the NCC. Call monitoring sessions should also focus on identifying potential trends and issues, which can then be tracked through reporting.

8. Implement a process to measure customer satisfaction.

The NCC should implement an ongoing customer satisfaction measurement process. The NCC and EEOC should also use information obtained through satisfaction surveys to make operating model changes that positively impact customer experience and gain more efficiencies in terms of overall EEOC and NCC effectiveness.

The NCC should conduct surveys on an ongoing basis, not as a one-time project. Customer expectations change from time and time, and it is important to measure and monitor them on an ongoing basis. The NCC should utilize the current methodology that the CFI Group uses to collect satisfaction information. Using an IVR option after each call is not effective for collecting this information, as customers have the option to self-select whether they participate. This can bias the results.

9. Develop baseline EEOC metrics to measure performance and monitor periodically.

There are presently no reliable baseline operational metrics to evaluate the NCC's impact on the EEOC's efficiency and effectiveness. It is essential to develop baseline metrics in order to evaluate the NCC's future impacts. The team recognizes that metrics specific to measuring the NCC's impact may have broad application across the EEOC, but this team's only purpose is to recommend development of metrics that measure the NCC's impact. The performance metrics upon which the EEOC measures the NCC's success should be based on key desired operational outcomes that will indicate increased efficiency and effectiveness of EEOC field and Headquarters operations. The EEOC's live call monitoring is a good source to evaluate the quality and consistency of technical information provided to customers.

The JPS Team recommends that the Steering Committee be responsible for establishing key goals and desired outcomes related to how the NCC affects the EEOC. Once these are identified, the EEOC can develop metrics. If these metrics are developed in terms of desired outcomes,

they can also be used to drive operations. Table 39 shows possible key goals, desired outcomes, and metrics. The chart is provided for illustrative purposes only.

Table 39. EEOC Metrics to Measure Impact of the NCC

Key Goals	Desired Outcomes	Metric
Customer Service	Customers receive accurate and timely service.	Customer satisfaction via post card mailed to customers one week after the charge is filed or dismissed. Fewer customer complaints.
Operations	Increase field efficiency and effectiveness.	Reduced number of Class C cases. Increased benefits per charge.
Business Processes	Reduce charge-processing time.	Reduce time from the initial contact to when the charge is filed.

In addition to the above, the Government Accountability Office (GAO) recommends the following regular oversight practices in its February 2006 report on Federal Contact Centers:

- Regular knowledge database management – at least annually review information CSRs use to respond to inquiries.
- Regular contact monitoring – at least weekly review information provided in calls/emails to evaluate how well CSRs handle inquiries by using a scoring sheet and rating CSRs in multiple areas including courtesy, accuracy, completeness of information provided to the customer, and timeliness.
- Post-contact customer satisfaction survey – ask customers about the level of service received from the contact center and, to a limited extent, opinions about the accuracy of information received.
- Validation of contractor reports – validate data to ensure accuracy in prepared reports, including operational information such as the center’s workload volumes, transaction handling times, and results of the contractor’s monitoring.

If future measures rely upon source coding in the IMS, the EEOC should review existing coding, correct errors and inconsistencies across offices and establish standardized procedures to ensure that all offices are following the same guidelines in coding future inquiries. In addition, if the EEOC considers telephone calls to offices in the field and Headquarters an important measure of future progress, then it should establish procedures for all offices and Headquarters to capture the important information.

10. Implement Change Management practices.

The implementation of a contact center is a significant change for any system. EEOC employees must become engaged in the process of implementing the NCC in order to become vested. The EEOC can accomplish this goal by developing a change management process. This should include defining and making visible the reasons that the NCC is important, articulating the vision

of the NCC, removing some of the obstacles encountered to date (implementing the recommendations above), and celebrating and building on short term wins. The JPS Team recommends establishing a core advisory group responsible for managing the change process. Through communication and training, they can ensure that the decision-making process related to the NCC is transparent to EEOC employees.

It is important to communicate with employees on a regular basis. This communication could come in the form of a web page on the EEOC's intranet that would also be accessible to CSRs. The EEOC should articulate the business case and urgency for continuing the pilot, as well as the NCC's mission, goals, and objectives. Communication could include information about the upcoming advertising campaign, as well as progress toward implementing recommendations. The EEOC and NCC metrics should be visible and shared with all staff on a regular basis. Other information may include new FAQs and trends developed by the NCC. Offices could also share their successes and best practices. The existing NCC Newsletter should evolve into a means of communicating information in addition to successes.

Staff at the NCC and EEOC will need training regarding the integrated processes and their respective roles and responsibilities. They will also need training on communication policies and procedures in order to increase effectiveness. This training will give each organization a better understanding of how to help the other, resulting in synergies that will benefit all (EEOC and NCC staff as well as EEOC customers).

Appendix A. Comments to Draft Report

Office of the Chair

April 17, 2006

TO: Aletha L. Brown
Inspector General

FROM: Cari M. Dominguez
Chair

SUBJECT: National Contact Center Evaluation, Draft Report, April 7, 2006

In response to your memorandum of Friday, April 7, 2006, circulating for comment the draft report entitled "The EEOC's National Contact Center: An Evaluation of Its Impacts," I have asked for a complete, detailed response to be provided to you on all of the draft report's statements and recommendations. You will receive comments next week from the Office of Field Programs, which will provide all appropriate data and updates on issues that have been resolved since the earlier time period covered by the draft report.

Initially, though, I have a number of observations to pass along. I would hope that the final evaluation focuses more carefully on what triggered the establishment of the Contact Center: the urgent need to improve the EEOC's service to its customers. That should be the touchstone for evaluating the impact of the Contact Center. I am pleased that the report indicates that field employees believe that the major purpose of this initiative, customer service, is being advanced by the Contact Center, and that the Contact Center has been picking up calls that had previously been dropped or lost due to inadequate telephone technology. As noted on page 40 of the draft report, the customer satisfaction index for the Contact Center is above the national average and above the average for the federal government. The report also notes the substantial increase in e-mail communications with the public and the significant expansion of access for Spanish-speaking and other callers as a result of the Contact Center. These services not only fulfill government-wide mandates, but, most importantly, enhance our customer service orientation in ways that were not possible before the Contact Center.

To give just one example, on April 7th I was in Miami appearing on Univision television in a nationally broadcast interview. That day, the Contact Center successfully handled more than 300 calls from Spanish-speaking individuals seeking EEOC assistance and information -- a significant upsurge from the normal call volume of an average of 60 Spanish language calls on Fridays. The centralized resources, technological efficiencies, and expanded hours of the Contact Center are what make possible this heightened level of responsiveness to public concerns.

Unfortunately, the draft report, as currently written, fails to present a balanced picture of how the Contact Center is providing the public with critically needed improvements in customer service that could not feasibly be attained through other means. The draft report's emphasis on expectations beyond improved customer service, and inclusion of subject areas not intended to

be addressed by the Contact Center, not only incorrectly define the purpose of the pilot but demonstrate a misunderstanding of the Contact Center's principal underlying concepts. Even in non-customer service areas where there have been positive developments – such as 30% of offices reporting the ability to redirect resources as a result of the Contact Center – that result is presented as a negative.

The draft report must be viewed in the context of the Contact Center's development and would be more useful if it would note that the observations made by the evaluators took place early in the Center's operation. There should be some recognition that when the review began in September 2005, the Contact Center was in its sixth month of national operation. It was and is a pilot program. The Contact Center has logged hundreds of thousands of contacts, and, it must be remembered, was established on a pilot basis:

- to develop accurate baseline data on the volume and nature of calls,
- to develop and refine scripts based upon actual requests for information and their frequency,
- to develop and refine standard operating procedures and business rules, and
- to develop the most effective working relationship between the Center and field offices.

Much has been learned thus far in the pilot. New scripts have been developed and standard operating procedures and business rules have been revised. Many changes have been made in response to suggestions from the field offices. The Center in April 2006 is different from that reviewed in September 2005 and will continue to evolve and change throughout the pilot. While the draft report makes a number of recommendations for improving the implementation of the Contact Center, because the draft report is a snapshot in time, it does not acknowledge that many of the steps recommended have already been taken. Process improvements have been put into place and other recommendations, such as marketing to increase usage of the Contact Center, were already planned and are scheduled to occur in the near future.

Not only does the draft report treat the Contact Center as a finished product, but it relies heavily on opinion and anecdotal observation rather than hard data and evaluation of that data. I am sure that you will find the forthcoming full response to the draft report to be illuminating and useful to the final report.

cc: Vice Chair Naomi C. Earp
Commissioner Leslie E. Silverman
Commissioner Stuart J. Ishimaru
Commissioner Christine M. Griffin
Leonora L. Guarraia, Chief Operating Officer
Headquarters Office Directors
District Directors
Ed Elkins, Project Manager, EEOC National Contact Center
Cynthia Pierre, Director, Field Management Program
Gabrielle Martin, President, National Council of EEOC Locals No. 216

Office of Field Programs (OFP)

MEMORANDUM

April 21, 2006

TO: Aletha L. Brown
Inspector General

FROM: Nicholas M. Inzeo, Director
Office of Field Programs

SUBJECT: National Contact Center Evaluation, Draft Report, April 7, 2006

In response to your memorandum of Friday, April 7, 2006, circulating for comment the draft report entitled "The EEOC's National Contact Center: An Evaluation of Its Impacts," the Chair asked that I prepare a complete, detailed response to be provided to you on all of the draft report's statements and recommendations.

Our first observation is that the report minimizes the significant contribution that the National Contact Center (NCC) is making to improved customer service. When the NCC opened to accept calls nationwide on March 21, 2005, the Commission became dramatically more accessible to the public. Through the NCC, constituents can communicate with the agency in more than 150 languages by telephone, TTY, fax, written correspondence, e-mail and web inquiries and obtain quick, accurate information. The Center is open 7:00 a.m. to 7:00 p.m. Central Time, Monday through Friday, and callers can speak with knowledgeable, EEOC trained Customer Service Representatives (CSRs) usually within 30 seconds. Frequently Asked Questions (F AQs) posted on the Center's web page and an Interactive Voice Response (IVR) telephone system provide information to the public 24 hours a day.

The NCC's positive impact on the agency's customer service is also demonstrated through the results of an independent customer satisfaction survey conducted in February. The EEOC's NCC received an overall American Customer Satisfaction Index score of 77, which is 6 points higher than the average Federal government score. Additionally, callers to the NCC gave its Customer Service Representatives a CSI rating of 84, an unusually high rating, particularly for an operation still in a developmental stage. Yet, the report downplays this success, claiming that there is no pre-NCC baseline, even though the ACSI provides comparative baselines as it maintains data among similar federal agencies' performance levels.

This impact is further demonstrated when comparing pre-NCC call volume with current NCC activity. Based upon a one month survey conducted in March 2003, it was estimated that 61 % of calls to field offices were for general information or potential charge inquiries that did not require the expertise of EEOC investigators or attorneys even though many such staff had to handle the calls. Comparatively, between March 21, 2005 and March 31, 2006, the NCC

handled 402,383 customer contacts. Of these 402,383 contacts, 302,622 transactions were handled by the NCC staff and only 89,813, or 29.7% of contacts handled by NCC staff were sent to field offices for resolution. In addition, there were 118,332 hits on the NCC hosted FAQs.

Our second key observation is that the evaluation is fundamentally flawed as it is based on misunderstandings and incorrect assumptions of the intended roles of both the NCC and the EEOC Assessment System (EAS). The evaluators have measured both the NCC and the EAS against standards they were not designed to achieve--namely, neither was intended to supplant the role of the investigator in the intake of charges. Charges are drafted by Investigators or Investigative Support Assistants after in-depth interviews. That the NCC staff is screening out more than 70% of all contacts without involving the field, leaving approximately 30% for field staff to handle, demonstrates that NCC is achieving its objective.

The NCC evaluation draft report was prepared by a contractor (JPS), who subcontracted with Convergys. We note that Convergys took the lead in evaluating the operation of the NCC. In 2004, Convergys bid on the contract for operating the EEOC National Contact Center and is an industry competitor of Pearson. We believe having Convergys evaluate the operation of the NCC poses a serious conflict of interest. We note that Commission Stuart Ishimaru said at a September 17, 2004 Commission meeting:

Finally, Commissioner Miller and I had many talks on this before he left the agency, and he was very proud that he was able to put in the proposal that was voted on by my colleagues last year, a provision that we will have outside review of the call center pilot. And I would hope that we pick the reviewer very carefully, and I would hope that we get a true outside contractor, and not someone who has any ties to call centers, or to any of the contractors who deal with call centers.

The conflict of interest compounds our concerns about the substance of the report outlined in the attachment as it likely undermines the independence and validity of the report overall. Furthermore, the fact that this report was being prepared by the subcontractor simultaneously to their preparing for trial of an ADA case in which EEOC had found cause and had filed suit should raise serious concerns not just about the motivation for the report's findings and conclusions but also about the prudence of selecting a vendor, even as a subcontractor, for a project of this magnitude without either ascertaining whether there was any outstanding litigation involving the vendor or disclosing this conflict in the report.

Beyond the serious concerns cited above, the draft report contains many misunderstandings and factual errors that seriously undermine the credibility of its conclusions and findings. Our attached response discusses these in detail, but I will cite several examples here.

Rather than duplicate the 2003 call volume survey, the contractor chose to survey employees about their impressions and opinions. This survey produced little data. Significant in the survey of employee opinions is the clear assumption by EEOC staff that the NCC would conduct intake. The Chair and the Commission did not authorize the NCC to conduct intake. Yet the contractor fails to recognize the disconnect between

employee opinions and the intended role of the NCC and makes many conclusions using this erroneous position.

Throughout the report, there are references to a 50 percent resolution rate by NCC staff, but the monthly data from March 2005 through March 2006 shows a significantly higher resolution rate: 70.3 percent for calls handled by NCC staff.

The report contains the note on page 41 that the number of CSRs is constant throughout the day. However, the NCC adjusts the number of CSRs throughout the day according to call volume and it is tracked for each 30 minute period and is available on reports maintained by the NCC.

On page 49, the report concludes that the NCC should adjust their internal processes to achieve better efficiency, consistency, and quality of service, and claims that the NCC expects the CSRs to be "proficient users of 800 scripts in communicating with the public." Yet this figure is highly inflated and reflects an inaccurate number of scripts. The NCC uses 119 Internal Scripts (in both English and Spanish) 163 FAQs, and 121 reference database IDs in the Right Now tool. The reference database has contact and coverage information for EEOC field offices and Fair Employment Practices Agencies (FEP As). In addition, they have internal web access to information about other federal agencies, their programs, and EEO counselor contact information. This is a very manageable volume of reference materials, given the electronic mechanisms in place to facilitate quick access and retrieval.

Because there is such a fundamental misunderstanding on the part of the contractor of both the purpose for establishing a National Contact Center and the actual operation of the center, it is clear that the present draft report should be withdrawn. We believe that any subsequent draft must address the many concerns contained in our comments. We are available to meet with you to discuss our concerns and provide any additional information that might be needed.

Attachment

cc:

OFFP COMMENTS ON NCC EVALUATION DATED 4/7/06

OVERVIEW

In its February 2003 report, *Equal Employment Opportunity Commission: Organizing for the Future*, the National Academy of Public Administration recommended the establishment of a nationwide, toll-free National Contact Center (NCC) be given the Commission's "highest priority" to enhance customer service by providing consistent and accurate information. With the NCC handling general inquiries which do not require an investigator to answer, investigators would have more time for more substantive tasks.

Based on the data contained in the draft report and in the quotes from the report noted below, it appears that the NCC has been successful in meeting both of the key objectives.

*"CSRs provide customers consistent and accurate information regarding charges and other general inquiries."*³⁶

*"NCC as a Customer Service Initiative--According to one Office Director, the NCC has institutionalized the delivery of customer service and now the customer service orientation happens every day; it is not just a one-time initiative. The short turnaround requirements by the NCC have heightened timeliness in responding to customers by phone or mail as well as customer service expectations, delivery and follow through."*³⁷

*"Customer Contact--EEOC employees report one benefit of the NCC is that customers have access to a live person on their initial call for more hours of the day, rather than leaving a voice mail and then not receiving a return call until the next day. In addition, the NCC provides timely access to customers since they can contact the EEOC through several channels (e.g. email and fax). Further, each PCP hears immediately from an office by phone or mail. Finally, the NCC provides people who can listen to callers who want to vent their frustrations."*³⁸

*"The Office Directors who reported reduced call volume felt their employees were better able to answer and return phone calls on a timely basis. This has relieved pressure on people answering phones, and now fewer people must answer "cold calls" (initial calls from the public)."*³⁹

*"After removing outliers (people who reported answering more than 1,000 calls in one week), results show relatively larger decreases in number of calls answered in Pay Grades 4 through 7. There is also a decrease of calls in Pay Grade 12."*⁴⁰

Even beyond these findings, there is other information to support the NCC's positive contributions to improved customer service. In an independent customer satisfaction survey conducted in February 2006, the EEOC NCC received an overall American Customer Satisfaction Index (ACSI) rating of 77, which is 6 points higher than the average for Federal

³⁶ Page 40, # 6

³⁷ Page 37, # 2

³⁸ Ibid

³⁹ Page 17, # 1

⁴⁰ Ibid

government as a whole. NCC staff answering the calls received a CSI rating of 84, a score that the draft report acknowledges is rare.

The operations and structure of the NCC make the Commission dramatically more accessible to the public. Through the NCC, constituents are communicating with the agency by telephone in more than 150 languages, TTY, fax, written correspondence, e-mail and web inquiries. The Center provides quick, accurate information from 7:00 a.m. to 7:00 p.m. Central Time, Monday through Friday. Callers can speak with knowledgeable, EEOC-trained NCC staff usually within 30 seconds. Frequently Asked Questions (FAQs) posted on the Center's web page and an Interactive Voice Response (IVR) telephone system provide information to the public 24 hours a day.

The NCC also assists the agency in meeting other requirements, including the provisions of Executive Order 13166, which requires federal agencies to provide persons with limited English proficiency (LEP) with meaningful access to their services. Each agency is required to have a Language Assistance Plan for ensuring this access. The EEOC's NCC increases the agency's accessibility to the LEP community by offering services in 150 languages and the NCC serves as a cornerstone of the agency's Language Assistance Plan. In another example, under the President's Management Agenda and H.R. 2458, the "E-Government Act of 2002," agencies are required to expand the use of the Internet and computer resources in order to deliver Government services. This means that EEOC must be accessible to the public by e-mail and the NCC fulfills that requirement by handling more than 1,500 emails a month and hosting a FAQs site which received 15,440 hits in March 2006.

This context of the NCC's effectiveness is a particularly critical springboard for our specific comments on the report itself which follow for it appears that these positive attributes and key functions of the NCC have been lost or omitted from consideration in the actual report narrative and the findings. Our detailed comments track the outline of the report and cite the referenced text (in italics) from the report, followed by our response and assessment.

COMMENTS ON EXECUTIVE SUMMARY

Page i: There were no baseline data to use in evaluating the impact of the NCC on EEOC operations and staff. Some baseline data were destroyed and other data either had major data entry errors or were confounded by factors such as CSR turnover rate (attrition) and changes in EEOC office intake procedures. As a result, we were forced to rely on interviews, focus groups and survey data in conducting this assessment.

The NCC evaluation team (JPS) was provided a copy of the 2003 NCC Assessment Report which contained a detailed description of the methodology used in conducting a month-long telephone survey, copies of the original survey instruments, and the detailed instructions for preparation of the telephone logs used in conducting the survey. The NCC evaluation team also was given detailed tables containing the survey results by office cluster and nationwide. The baseline data results from the 2003 telephone survey exist and are contained in the detailed 2003 NCC Assessment Report. The only missing documents were the completed survey forms and the data tape on which the raw data was saved. The same statisticians who conducted the analyses are still employed at EEOC and were available for interview regarding any statistical methods or formulas used. In sum, all the ingredients were present to allow the evaluation team to replicate the telephone volume

study, if desired, for comparison with the results of the 2003 study. The decision of JPS to rely only on interviews, focus groups and surveys which relied on respondent opinions, perceptions and recollections is not entirely explicable.

Additionally, JPS acknowledges they were advised that a comparison of metrics on merit factor attainment would be an objective measure of whether the time available to investigators and the quality of investigations improved since the opening of the NCC. Improved quality of cases is the expected result of freeing up investigator time from answering general calls in order to devote more time to investigations. As discussed more fully below, the data in the draft indicates that investigators on average receive 11 fewer calls each week. Merit factor, a measure of investigator resolutions that benefit charging parties, is an objective measure that EEOC has reported to OMB and Congress for many years and has withstood scrutiny of many other outside evaluators. Merit factor, in fact, increased from 22.2% at the end of the first quarter of FY 2005 to 23.9% at the end of the first quarter of FY 2006. While an actual cause and effect cannot be determined, the correlation with the operation of the NCC exists and should not be casually dismissed.

The result of these decisions, however, means that the report is heavily slanted toward opinions and perceptions rather than objective fact and statistical validity. Perceptions, of course, are very important, but they should be used to explain data, rather than be used as substitutes for objective data gathering.

Page ii: *The NCC is not close to meeting estimates of call volume. The NCC is handling just one-fifth the projected volume of calls. The NCC was expected to save 43,224 field staff hours which is equivalent to 21 Full Time Equivalent Employees (FTEs). We calculated that the NCC presently saves the EEOC approximately 12,504 hours or 6 FTEs.*

The above statement contains a number of misunderstandings which require correction. First, the projected call volume was significantly affected by the decision to allow public calls to continue to come into field offices directly while only calls to the EEOC toll-free numbers went to the NCC. The projected call volume assumed that all calls would be directed to the Contact Center. Because the NCC is a pilot project, it was recognized that it needed time to train and develop staff, standardize operations, and work out a relationship with both the public and the EEOC offices it serves. It was prudent not to immediately cut off the local public lines and direct all calls to the NCC while it was in its developing stages.

Second, based on an analysis of the calls logged in the March 2003 survey, the 2003 Assessment Report estimated that 61 percent of 1.2 million unsolicited calls were general in nature and could be handled by a contact center. March 2006 was the busiest month since the Contact Center opened, with 34,792 callers served by the NCC. In addition, there were 2,228 e-mail customers, 62 persons sending written correspondence, and 64 persons sending facsimiles for a total of 37,146 customers served, or an annualized number of 444,000. While this number of contacts is below 732,000 (61% of 1.2 million), it represents more than half the projected volume and, certainly more than the “one-fifth” of expected volume mentioned in the NCC evaluation report. Also, the monthly contact volume is trending upward as more and more of our offices provide callers the option to call the NCC on their local public telephone greeting.

In reaching the conclusion that call volume has been low, the report (table 10, page 19) indicates that the average monthly call volume has been around 21,000 calls. We believe that, in using this number, the report mischaracterizes calls handled by the NCC with calls handled exclusively by an NCC employee and equates calls handled by NCC employees with total workload. The NCC has an average monthly call volume over 30,000. Moreover, the NCC is a contact center. It accepts telephone calls, electronic mail, facsimiles and postal mail. Telephone calls are answered both through an interactive voice response (IVR) network and by NCC employees. Any person who calls or otherwise contacts the EEOC through the NCC is one less person calling or contacting the EEOC directly. Thus, the average monthly call volume reported should include all calls, both those answered through the IVR network and those answered by NCC employees, and all contacts with the NCC.

The focus for the NCC during the first year of operation was on recruitment, training and retention of qualified staff; development and refinement of scripts and FAQs; development of communication and marketing procedures; and development of reports to assist EEOC in decision-making in a variety of arenas. The evaluation report should make it clear that the purpose of the pilot was to “allow for the collection of refined baseline data on performance metrics and costs during the first 12 months and vendor performance during the second twelve months.”⁴¹ The refined baseline data would provide actual information on the number and types of contacts received at the Contact Center and form a basis for future estimates of call volume.

Making the necessary changes to the report to accurately reflect the volume of work will also help the report remain internally consistent. In the next section of the report on the impact on field staff, the report states that 15 offices had already been able to redirect resources as a result of the NCC. Savings of employees’ time in 15 offices, at such an early stage in the operation of the NCC and with all the limitations imposed on the NCC, indicates significant savings in field staff time. Directors in 15 offices reporting such staff savings also calls into question the estimate reported on page 10 that only 6 FTE had been saved by the NCC. The difference between 15 offices already reporting that staff has been assigned other functions and your calculation that 6 FTE have been saved illustrates the economies of scale that the NCC is able to achieve. What in the NCC environment is calculated as a 6 FTE savings is in a field office environment 15 or more people who no longer are required to answer phones. The savings to field offices will always be greater than the calculation of FTE in the central location.

The evaluation team further suggests that the NCC was projected to save 43,224 staff hours. We acknowledge the decision to continue to retain the local public telephone lines in all EEOC offices had a direct impact on the ability to achieve savings in staff hours. The evaluation team’s calculation of staff hours saved is flawed as it is only based on percent of calls resolved using a contact center model for its estimate. To obtain a more accurate calculation of staff hours saved, the evaluators should incorporate the volume of calls resolved by the IVR, the number of e-mails resolved and the number of “hits” on the FAQs into their formula and determine how many FTEs would be devoted to those functions in the 51 field offices. It is reasonable to expect that a substantial number of people get their

⁴¹ Recommendation 3. 2003 NCC Assessment Report, p. 51.
Job Performance Systems

queries answered using these alternative channels to voice contact. Projected savings is also flawed since EEOC field offices could not operate with the economies of scale of a contact center.

Page ii: *Impact of the NCC on Headquarters Operations.*

There appears to have been a decrease in controlled correspondence and an increase in other communication such as web hits. However, there are no data to indicate this is due to the NCC.

It was never anticipated that the NCC would have any significant, direct impact on Headquarters' operations. Processing inquiries and other contacts from potential charging parties is primarily a function of the field offices, not Headquarters. The report does accurately acknowledge the decrease in complaints from the public regarding their inability to reach an EEOC office by telephone.

Although there is no direct data to indicate that the NCC played a part in the increase of web hits, it should be noted that the NCC IVR provides the EEOC web site address and the NCC staff who work correspondence and take phone calls also have educated the public on the vast, helpful information that one can receive by visiting this site. It is, therefore, logical to conclude that the NCC played a part in these increases.

Following meetings with the Chair immediately after the new year in 2006, Commission staff developed an NCC Marketing Plan for the purposes of providing more information to the public and Commission staff about the NCC and increasing the call volume of the NCC.

A working group developed a plan to market the services provided by the NCC. The objectives of the marketing campaign are:

- **To create awareness among target audiences of EEOC's readiness to help whenever employment discrimination is suspected**
- **To position 1-800-669-4000 as the preferred method for accessing EEOC.**
- **To increase volume of inbound calls to the NCC.**
- **To increase confidence in the quality of service delivered by the NCC among EEOC staff members.**

The plan includes the following actions:

- **Developing and distributing of outreach materials, such as a brochure and single-page handout/flyer.**
- **Designing and distribution of promotional give-aways, such as magnets (for service providers) and palm cards (like a business card with general information).**
- **Developing PSAs and distributing to radio stations nationwide to be read by on-air talent.**
- **Placing ads on Google.**
- **Mailing informational letters to various advocacy group national headquarters for distribution to local chapters/affiliates.**
- **Listing the 1-800 numbers in the Blue Pages both under "discrimination" and "EEOC."**
- **Changing the EEOC website to allow easier access to FAQs.**

- **Developing press releases and stories for field offices to send to local print media contacts, particularly to ethnic and minority publications.**
- **Redirecting first-time callers to field office local numbers to the NCC.**
- **Developing internal EEOC/NCC newsletter on the staff and services provided at the NCC.**

Page ii: *Impact of the NCC on Field Operations*

It appears there has been only a minimum reduction in calls to most offices. There are several reasons for this. First, the NCC is not taking as many calls as anticipated. Second, the NCC is referring many calls it does receive to the EEOC offices rather than completing the appropriate form and submitting the information electronically. Third, most of the offices are still taking unsolicited local calls and referring customers to the NCC only when they receive voice mail and do not want to leave a message.

The issue about NCC call volume was previously addressed above. However, there are several explanations for why field offices receive calls either directly from the public or on referral from the NCC that apparently were not considered in this conclusion. Callers are referred to EEOC offices because sometimes they specifically request the office phone numbers to contact the offices directly. Further NCC staff are instructed to refer/forward to EEOC complex questions for which the NCC staff does not have approved scripts to consult. There are also callers who are insistent upon speaking with a field office even though it appears EEOC does not have jurisdictional coverage or the time limits may have run out. Under NCC business rules, these callers are referred/forwarded to the field for a determination as to coverage and jurisdiction.

Page 2: Page ii: *Impact of the NCC on Field Staff*

We found minimal impact on field staff. Fifteen of 51 offices (30 percent) have been able to redirect labor resources as a result of the NCC.

This section of the report indicates that the NCC has created little additional time for field staff and is creating inefficiencies. At the same time the report indicates that 15 offices have already redirected resources as a result of the NCC. Since the interviews with field staff were conducted in February, less than one year after the NCC became operational, realizing staff savings so soon is quite positive and indicates that the NCC is creating and will continue to create additional time for field staff.

Field staff commented that the NCC was not reducing the “normal intake process.” (page 24). This entire section of the Report, which uses the opinions of field staff to form the findings, is based on the expectation that the NCC would relieve field staff of intake duties. Intake duties are the least favored duties among field enforcement staff. Their expectation, perhaps their hope, that they would not be required to perform their least favorite activity, is unrealistic and finds no basis in the 2003 report or in the Commission vote. These unmet, yet unrealistic, expectations serve to emphasize the point, as the Report concludes, that insufficient change management communications have been initiated. Clearly, a change management plan is needed.

The unrealized, and unrealistic, expectations of field staff should not be used as the basis for the conclusions in this section of the report. The NCC was not going to relieve field

staff of intake duties. The report by field staff that duplicate work was being performed – EAS forms completed by the NCC and Form 283 intake questionnaires completed by field staff – illustrates the point. The EAS was not intended to replace Form 283. NCC staff is not to perform intake work and EEOC field staff sending out intake forms does not duplicate the work of the NCC.

The discrepancy between what the NCC is intended to handle and the unmet expectations of field staff is most clearly illustrated in the following excerpt from the Report:

Validating the above EEOC observations, while monitoring calls at the NCC we observed that the CSRs do little probing to understand the validity and nature of the claim. They leave it completely up to the caller to determine whether his/her charge can be considered discrimination. (Report, page 30).

NCC employees are not supposed to probe to determine the validity of a charge. Such probing is appropriate in intake, not at the NCC. The conclusions in this section of the Report, based on such a fundamental misunderstanding of the role of the NCC (by both EEOC field staff and the report writer), should be revised or discarded. Furthermore, when 40% of field employees say that the NCC is creating duplicate work by not screening out more contacts, reporting such conclusions only exacerbates the misperceptions of field staff and the report writer. While field staff believed that all the information on EAS forms was correct up to 67% of the time (Table 13, Page 27), we do not know how high that percentage should be if all the parties understood the expectations for the NCC.

Page iii: *NCC Impact on EEOC Customers*

The EEOC collected customer service satisfaction ratings on the NCC. The NCC was rated above average compared to other Federal agencies and to service industries in the private sector.

The statement here in the Executive Summary appears to downplay the real success the NCC has achieved in customer satisfaction. The Report (page 37) states that “[c]ustomers indicate a positive experience [with] the NCC.” Indeed, the report contains significant indications that customer satisfaction is extremely high. A customer satisfaction survey of all NCC contacts yielded a Customer Satisfaction Index rating of 77. The Index of 77 was for all types of contacts -- phone, e-mail and fax. The report indicates that Federal Government scores on this index are in the high 60’s and low 70’s. Thus, an Index of 77 for all types of contacts, in the first year of operation, is extremely strong. The Report indicates (page 40) “[t]here are a few low 80’s but they are rare.” However, the Report does not state, and we believe it should, that the Survey yielded an Index of 80 for all calls received and in rating the NCC staff, the Survey yielded an Index of 84. With a score in the low 80’s so rare, an Index of 84 for the service provided by the NCC employees is phenomenal. We question why those results were omitted from the report. Those results belie the finding in the Report (page 38) that a customer’s experience depends on the NCC employee reached. An Index of 84, which is rare, indicates otherwise.

The Report comments on the “soft skills” of NCC employees (page 40) indicating that they are not consistent. The Report does not, though, explain the qualifications and training of the NCC employees. An employee of the NCC must have at least one year of customer service experience and at least six months of contact center experience. Many of the

employees are hired from other call center positions within the contractor's workforce. As a result, the employees already have experience and training, especially in the soft skills. Moreover, as part of the contract, all NCC employees are given an introductory two-week training session on substantive issues and soft skills. Refresher training has been provided monthly, on average, since the introductory training as well as whenever scripts are added or revised.

Additionally, calls received at the NCC may be monitored by an NCC manager or by an EEOC manager. In addition, some calls are recorded and reviewed by NCC or EEOC managers. Each week, NCC and EEOC managers review the monitored and recorded calls at a "calibration" meeting. That meeting reviews both the substance of the response and the soft skills demonstrated by the NCC employees, as well as the individual monitoring by NCC and EEOC managers. The results of these calibration sessions are shared with the CSRs and serve as an indicator of when additional training is needed.

The experience requirements, the training and the calibration sessions all contribute to the Customer Satisfaction Index of 84 received by NCC employees. That score indicates an extremely high, and rare, quality of service by NCC employees. It is difficult to justify, then, the statement in the Report (page 40) that the soft skills of NCC employees are inconsistent.

COMMENTS ON RECOMMENDATIONS

NOTE: As discussed throughout this response, we do not believe the recommendations in the report are supportable. We also believe that the recommendations need to be significantly revised based upon the information and clarifications provided throughout this response. We re here providing comment on those recommendations that have not been the subject of comment in other portions of these comments. Other recommendations made in the report but not reflected in this section have been addressed in comments on other portions of the report.

Change or Discontinue

- 2. Significant changes should be made to the operating model. The citizen contact process should be standardized across the EEOC and NCC. A "Steering Committee" should be set up with representation from the field, headquarters, and the NCC to develop a single intake process flow that begins with the initial contact at the NCC and moves on to the EEOC after meeting certain criteria. Prior to implementing this process across all EEOC offices, it should be piloted with a few different types of offices to identify and close potential gaps.*

The recommendations to establish a "steering committee" of EEOC and NCC staff to standardize initial contact and intake processes and a "core group" to establish metrics to measure desired outcomes are good ones. In fact, OFP established an Intake Services Work Group in October 2005, consisting of representatives from the field and headquarters and headed by a field deputy district director. The charter for this workgroup was to collect data on the various intake procedures and customer service practices across the country and to make a set of recommendations to improve and standardize the quality of customer service and intake work products. The Intake Work Group is expected to issue its report in the near future; however, adding representatives

from the NCC to this group would be a natural expansion and allow for the development of a “seamless” process that has the understanding and buy-in of all stakeholders. Adding the development of metrics to the portfolio of this group also would be a natural connection and would avoid duplication of effort that creating a separate group might cause.

Change or Discontinue

3. *The NCC and EEOC should use the same or integrated technologies to capture and maintain customer information. This would promote communication between the two organizations and enable a better customer experience. Customers should not perceive a difference between the NCC and the EEOC when inquiring about issues. In addition, we recommend establishing a process for EEOC and NCC staff to communicate directly with one another. The purpose would be to share knowledge and information and to provide a vehicle to regularly ask questions and provide feedback.*

We agree. Complete integration of all of EEOC's data systems has been a long-time agency goal. Integration of IMS and EAS is planned for later this calendar year.

NCC Recommendations

5. *CSRs should receive training on soft skills and call management process and skills. We also recommend that CSRs receive training to improve the quality and quantity of the information provided. When information is sent from the NCC to the EEOC, it should provide value. To maintain high quality skills, we recommend the NCC provide regular feedback and mentoring to its CSRs*

CSRs do receive formal classroom training on soft skills and engage in role-playing with other CSRs and supervisors to practice their skills. Monitoring is done daily, with each CSR monitored at least four times a month. Feedback is given daily to the CSRs. In addition, monthly refresher training is conducted for groups of CSRs, and when needed, NCC provides individualized training. The recommendation ignores the inherent value to EEOC and to those we serve when NCC staff is available to receive calls and relay to EEOC field offices information that may serve as the basis for a timely charge.

COMMENTS ON METHODOLOGY

Page 2: Lacking historical data, we included some items in the electronic survey sent to all employees located in the field asking them to estimate the average number of calls they received pre and post implementation of the NCC. However, these data are only as reliable as the survey respondents' memory.

This is a very important point. Much of the data used in this report, particularly that which is critical of the NCC, are not hard data but are based on individual perceptions and opinion. The reviewer did not ask that documents supporting the perception or opinion be submitted, but relied on the perceptions as if they were factual data. Furthermore, as cited earlier, it was the contractor's decision not to replicate the March 2003 study for comparison purposes. While the information on staff perceptions is important, they are not the most accurate gauge of NCC performance; rather, they are indicators of the pressing need for change management and internal communications improvement.

COMMENTS ON FINDINGS AND CONCLUSIONS

Page 9:

2. Pearson contractual metrics implemented except for Customer Service.

. . . Pearson is meeting nearly all their data gathering requirements. The one exception is customer satisfaction. The EEOC contracted with a separate party to conduct a customer satisfaction survey.

The data gathering "exception" is required by the contract, which calls for an independent customer satisfaction survey. Therefore, this is not a deficiency by the contractor. While EEOC did contract for this separate survey as part of the pilot project, EEOC has initiated the lengthy process for obtaining approval from the Office of Management and Budget for an automated, continuing customer satisfaction survey which will be overseen by Pearson's Quality Manager.

Page 9: As the table shows, we believe the data related to information accuracy are subjective because they depend upon the CSR who takes the information.

As the report acknowledges, the information accuracy is captured through monitoring sessions. The data to assess and score the accuracy of the information provided and the accuracy of information captured are not subjective. The contractual metric for "accuracy of information provided" and "accuracy of information captured" are determined by monitoring each CSR at least four times monthly. NCC has very strict measures in place when monitoring and the NCC does not pass a CSR who has not captured and verified contact information. In fact, NCC will fail a CSR if they get two transactions wrong (this includes verifying). The NCC and EEOC (three employees with field office investigative experience) hold weekly calibration sessions to ensure consistency and accuracy in monitoring. Further in daily monitoring sessions conducted by EEOC, the accuracy of the information is objectively assessed, with a brief explanation of any errors or omissions in the call. These reports are sent daily to the NCC by the Project Manager. Feedback from the monitoring and calibration sessions is used to conduct refresher training, counsel CSRs, create performance improvement plans when necessary, and in general assist CSRs in providing accurate information to the public as approved by EEOC. The example provided only shows that some CSRs needed to be corrected and others are doing their job as expected of them. If the CSR does not take or provide the correct information, then it is not accurate and there is nothing subjective in the process.

The evaluators should provide the scores achieved on these two metrics. Also, they should have included data on actual NCC performance on the metrics, compared to the targets set in the contract. Finally, all the reports referenced in Table 2 on page 9 are provided weekly, not monthly as the chart reflects and this has been the case since March 28, 2005.

Page 11: *Table 4. Six Month Processing Estimates in Pearson Contract Compared to Actual Statistics, April through September 2005*
Estimates in Pearson Contract for English IVR - 719,554 –
Actual: For some months these data are not reported.

IVR call counts are available for the entire contract period. Detail data was not available for only two periods due to a software malfunction during the following periods in 2005:

- **July 2005: 3 days (19th, 20th and 21st)**
- **August 2005: 3 weeks (weeks of 8/7, 8/14 and 8/21)**

It is also important to note that counts for these periods were not lost, only the detail was not available. It is possible to approximate the data for the period when the software malfunctioned through an extrapolation of the data that was collected.

Page 12:

1. Written and telephone communications to headquarters decreased in Fiscal Year 2005, but there are no data indicating it is attributed to the NCC.

While there has been a trend of decreasing correspondence to the Chair, the information for the past 15 months is mixed. Comparing the first six months of Fiscal Year 2005 (pre-NCC) to the period April through September 2005 (post-NCC), there was an eight percent increase. However, comparing the October through December quarter pre (FY 2005) and post (FY 2006) NCC, there was a 30 percent reduction in correspondence. There is no clear reason for the changes. It is possible that complaints have reduced because the NCC is providing better customer service, but it also may be that the EEOC website is enabling people to more readily contact the field office rather than going through headquarters. Data related to telephone calls to the public EEOC telephone number (202/663-4900) over the past five calendar years have been kept following different assumptions and are not comparable.

Evaluators should acknowledge that the decrease could be, indeed, attributable to the NCC. The evaluators suggest, with no supporting evidence or data, that the reduction in calls and correspondence to HQ could be a result of people visiting the EEOC website and then calling or writing the field office directly. The field office contact information was available on the website long before the NCC came into existence. The EEOC public website went up in early 1997 and has had detailed information on contacting the field offices since that time. Therefore, it seems highly unlikely that the website is the only in reduced complaints, particularly given its existence in the pre-NCC era that is under comparison. A more probable conclusion is that the NCC has assisted people in contacting field offices when there were problems with the local phones. There have been many instances of persons calling field offices and after not being able to get through, then calling the NCC which was able to alert the offices that callers were having difficulty reaching them. With respect to the telephone call statistics, the evaluators failed to include information on phone inquiries from the EEOC's Integrated Mission System (IMS) that would have shown a drop in phone inquiries to the field offices:

Phone Inquiries in IMS

2004 – 50,892

2005 - 40,464

Furthermore, the evaluators failed to report that OCLA put a message on its greeting for its primary public phone line (202/663-4900) that referred callers to the toll-free number at the NCC. Callers to the OCLA number hear the information in the greeting if the phone is not answered live by OCLA staff.

Page 13:

3. *NCC has had minimal direct impact on publications requested.*

For the calendar year 2005, the Publication Distribution Center received 20,556 requests for EEOC publications, of which 342 (1.6 percent) were email requests from the NCC. The highest proportion of requests (69.2 percent) comes directly from the website order form, bypassing the NCC.

This observation should be eliminated. The NCC contract did not include publications fulfillment and we never advertised the NCC as a source for publications. We have a contractual option to add the publications fulfillment function, but the option has not been exercised. The e-mail requests received by the NCC were incidental. The NCC refers callers with internet access directly to the EEOC's clearinghouse website. For those without internet access, the NCC takes and forwards the requests to the Distribution Center.

Page 14:

4. *There is no evidence that annual or monthly charge statistics have changed because of the NCC.*

The 2003 NCC Assessment Report stated,

Some staff have expressed fears that establishing a national contact center would lead to loss of jobs and/or a skyrocketing of receipts. . . . it is possible EEOC receipts may rise with the implementation of a national contact center. Should receipts go up, more staff would be needed rather than fewer. Starting up as a pilot phase, however, would enable quality assurance procedures to be put in place to monitor the impact on workload and allow the agency to better forecast staffing needs.

The negative characterization of this conclusion, without any basis in the Report or the Commission vote, is a further example of assumptions and opinions used by evaluators without any basis in fact.

Page 15:

5. *While outreach efforts have increased, there is only anecdotal indication of any impact attributable to the NCC.*

While it was expected that the NCC could answer inquiries about EEOC outreach and Revolving Fund events; there was no specific goal or intention for the NCC to directly impact outreach efforts across the EEOC.

Page 16:

6. *There may be insufficient awareness of the NCC, but efforts are underway to broaden publicity of the toll free number.*

Specific to the NCC, a few employees commented that many of the EEOC's clients do not know about the toll-free number.

Perhaps the “few employees” are unaware that the toll-free number used by the NCC is the same toll-free number EEOC has had for years. This toll-free number is prominently displayed in all EEOC publications and on all EEOC posters required for display in American workplaces.

Page 17:

1. Field employees have mixed perceptions of the impact of the NCC on call volume to their offices.

The electronic survey asked employees to compare the number of calls they received in an average week pre and post implementation of the NCC. After removing outliers (people who reported answering more than 1,000 calls in one week), results show relatively larger decreases in number of calls answered in Pay Grades 4 through 7. There is also a decrease of calls in Pay Grade 12. We further investigated the perceived increase in calls reported in Pay Grades 14 and 15, and discovered that of the 85 respondents, only 11 people reported increases, 7 of whom indicated from 1 to 3 increased calls in a week. The remaining four respondents appear to be outliers. Comments from many of the field employees indicated they perceived no reduction in calls because the NCC is telling people to call offices directly.

Table 9 on page 18 shows a mean decrease of between 20 and 28 calls per week for each employee in Grade GS-4 through GS-7. That mean excludes outliers and is characterized in the report as “relatively large decreases in number of calls.” Such a decrease is also reported at the GS-12 level, which is the level where the great majority of EEOC field investigators are employed. These decreases are significant.

The Executive Summary, though, states that “there has been only a minimum reduction in calls to most offices.” We believe that the Summary should be corrected to reflect the discussion and the factual information contained in the Report. The data indicates a significant reduction in calls, but instead, the perceptions of field employees, which vary from the data, are being reported as a finding and conclusion. On February 4, 2006 there were 697 investigators on board of whom 644 (92.4%) were in Grade GS-12. In the March 2003 survey Grade 12 employees answered 32% of all calls, the largest volume at any grade level, so any reduction over this level should be considered both significant and a success of the NCC.

Since the factual information for employees in grades up to GS-13 excludes time spent by “outliers,” those who reported too many calls received, the table should be corrected to similarly exclude the outliers at the GS-14 and GS-15 grade levels.

Additionally, the evaluators missed the opportunity to review IMS data on phone inquiries, which, while not totally inclusive, gives an idea of the trend in call volume. (See response to the page 12 item above.) Also, the evaluators should have replicated the March 2003 telephone volume study to get an accurate view of call volume reduction or increase. Perceptions of impact will always vary tremendously across offices because workload and staffing varies by office depending on population density, demographics and staff retention rates. Perceptions will also vary depending upon whether the office is redirecting first time callers to the NCC through its voice mail message.

Page 19: *Call Resolution-*

Our call monitoring data analysis shows that the NCC is successful in resolving 50 percent of the calls (these calls are not forwarded or sent to the EEOC offices). These calls relate mostly to general inquiries or information about other Federal agencies. The other 50 percent of the calls are either referred (the caller is asked to contact EEOC office) or is forwarded via an EASQ to the EEOC office.

The data from March 21, 2005 through March 31, 2006 show that 89,813 calls were forwarded to EEOC field offices. Those referrals are 29.7% of all calls handled by NCC staff. Of the referrals made to EEOC field offices, the NCC completed an EASQ and sent it to the field office (26,250), took the customer’s information and forwarded it by e-mail to the field office so that the office could contact the customer (17,898), referred the caller to the appropriate field office (44,667), or made a hot-line transfer of the call (998) depending upon which option the caller chose.

March 21, 2005 through March 31, 2006

TOTAL NCC INQUIRIES	402,383
IVR handled calls	99,761⁴²
Calls Handled by CSRs (English & Spanish)	276,662
TTY	3,031
Correspondence – Written	723
Correspondence – Email	17,239
Correspondence – Web	4,212
Correspondence – Fax	755
Total CSR Handled Transactions	302,622
Hits on Frequently Asked Questions	118,332

Page 20:

Office employees indicated that they still receive many calls to get case status.

When a charge is filed, the Charging Party (CP) is usually provided with the investigator’s phone number. It is natural for a CP to call his/her investigator to request case status and not to call the NCC. Further, some CPs may want more detailed information than that which is available to NCC staff through the IMS.

Page 21:

There is occasional informal communication between some office management employees and the NCC Project Manager at headquarters. The NCC Project Manager briefs district directors and field personnel who come to headquarters. There is no formal process for EEOC employees to ask questions directly of CSRs or give feedback on how the NCC can better serve the offices.

⁴² There was period when the software did not accurately capture this data. The number used is based upon the data that was collected with an extrapolation of that data for the period when the software malfunctioned (See our comment on response to the item on Page 11. Table 4).

There is more than occasional communication between field office employees and the NCC Project Manager. The field employees who are involved in processing EAS questionnaires and e-mails received from the NCC communicate regularly by phone and e-mail with Headquarters staff providing comments and suggestions. Further, staff have been encouraged to report any problems to the Project Manager or one of the Program Analysts who works on the NCC project. Misdirected EASQs, misspellings, or any other problems are reported to Headquarters and then discussed with NCC managers who counsel CSRs who have made the errors.

Page 21:

...Investigators would like to communicate directly with the CSRs rather than through the formal system (the GroupWise Email) because some issues are low priority and the established system gives everything high priority.

The default setting of “High Priority” was removed December 16, 2005.

Page 21: *NCC Staff Understanding of EEOC Objectives and Operations*

Interviews with NCC Team Leaders and focus groups with CSRs revealed that there is no common understanding of the program’s objectives. One Team Leader stated that the mission of the NCC is to “provide a general overview about the EEOC, information on discrimination, and forward escalations,” while another Team Leader stated that it is to “handle 70 percent of the calls that the EEOC was receiving and document the types of calls received for trending purposes.” While these two mission statements seem similar, their focus is completely different: the first one focuses on providing general information and forwarding escalations whereas the second one focuses on providing information and documenting the types of calls

The two team leads have different roles. One serves as the Content Manager, the other is responsible for reporting. As a consequence, their focuses are different and they responded accordingly. Both responses are correct though neither includes all of the program objectives. This does not mean that there is no common understanding of the program’s objectives.

Page 22:

6. EEOC and NCC technologies are incompatible, which adds to the workload of EEOC offices. There is no integration of technologies between the NCC and EEOC. The NCC uses RightNow software (Customer Relationship Management (CRM) technology) to document all information related to calls. If the caller wishes to file an EASQ, the CSR must transfer the information to the EEOC Assessment System (EAS). The NCC has “read only” access to the EEOC’s IMS. However, since the IMS is not integrated with either the RightNow software or the EAS, EEOC staff must separately enter information from the EASQ into the IMS.

We agree. Complete integration of all EEOC’s data systems has been a long-time agency goal. Integration of IMS and EAS is planned for later this calendar year.

Pages 22-23:

6. EEOC and NCC technologies are incompatible, which adds to the workload of EEOC offices.

Not only are the technologies incompatible, but also the NCC staff seems to have a lack of training on available software. For example, during the site visit to the NCC, the CSRs indicated they require a charge number to look up claim status on the IMS. If the caller does not have a charge number, they refer him/her to the EEOC offices. However, communication with the staff at headquarters indicated that the NCC has exactly the same access to the IMS in terms of looking up charges as the EEOC offices, i.e., they can look up charges several different ways including by Charging Party (CP) first and last names, Social Security Number, receiving office, and Investigator name.

This representation is incorrect and does not involve an issue of lack of training. These procedures insure information security. To avoid confidentiality problems, NCC staff have been instructed to only provide status information when the individual provides a charge number and other identifying information.

Page 26: *Creating More Work*

While 33 percent of the survey respondents said that PCPs they have talked with did not think they had already filed a charge with the NCC, 42 percent indicated that relatively many PCPs they talked with had the impression they filed a charge with the NCC.

There are three places in the scripts where callers are told they cannot file a charge over the phone. The first is after it appears that the caller's concerns are covered by EEOC, and they are advised, "You cannot file a charge over the phone but we can begin the process." Then the various options are explained. If the caller elects to go through the EAS system, the script reads "Our conversation today does not mean that you have filed a charge as one cannot file charges over the phone." At the end of the EAS process or if the caller chooses to write a letter to the field office or to have the office to contact him/her, the caller is told "Remember you have not filed a charge until you have signed a sworn document with an EEOC field office." Furthermore, this same phenomenon occurs when callers contact field offices directly; many believe they have filed a charge when they have only initiated an inquiry.

Page 26:

In addition, a few survey respondents reported that PCPs have said the NCC told them that they have a "good case" and upon further discussions, the EEOC office determined that the case was unlikely or that there was no case at all.

While NCC staff are encouraged to be empathetic and sympathetic, they are trained and instructed not to comment on the merits of a "case". Experience has shown that some customers hear what they want to hear in their dealings with both EEOC field offices and the NCC. EEOC routinely monitors 15-20 live calls a week. Of all the calls monitored, there has only been one where the CSR said the caller seemed to have a "good case". The NCC site manager was immediately notified and the CSR was counseled.

Page 27: *NCC Screening*

The field survey respondents indicated that the NCC is screening out many non-jurisdictional cases. The problem, however, is screening related to the EEOC bases of discrimination. Forty percent of the respondents involved in intake indicated that relatively many of the EASQs they receive should have been screened out. This number may be high because survey respondents are indicating that the basis on the EASQ was incorrect (one office indicated that it looks like the

CSRs are randomly picking a basis). In support of these survey responses, we observed during our NCC site visit that the CSRs do not probe the caller to find the right basis for discrimination. Instead, the CSRs read the list and let the caller pick the basis.

Page 29: Incomplete EASQs

Complaint information is also incomplete, which has led office intake staff and supervisors to suggest that CSRs need to probe to get information that is more descriptive. The reason for discrimination is not clear on the forms and there is less information than was expected. For example, if the form indicates the basis is pregnancy, it does not indicate why it was discriminatory. Many survey respondents indicated that the CSRs need to do a better job screening calls (e.g. more in-depth questioning and exploring complaints). Survey respondents indicated they would particularly like to receive more information relevant to the basis for discrimination.

Page 34: Information Forwarded to EEOC

For the information about callers that is forwarded to the EEOC through the EASQs, as described above, interviews with the EEOC staff revealed that the information sent is not very useful. Most of this information also has to be collected again by Investigators.

In all three of these findings in the report, there appears to be a clear misunderstanding of the role of the NCC. Neither the NCC nor the EAS was designed to supplant the role of the investigator in the intake of charges. Charges are drafted by Investigators or Investigative Support Assistants after in-depth interviews. In the discussions involving field and headquarters employees, both managers and non-managers, prior to the Commission decision to approve a two year NCC pilot, there was much concern about whether the NCC employees would be taking over the role of EEOC investigators in asking probing questions and screening out persons who might have viable claims of discrimination. The role of the NCC was clearly articulated in the presentation at the Commission meeting, held on September 17, 2004, when the Commission approved the contract to develop the NCC:

And lastly, although this may not be the last of the issues, but the last I'll discuss today, is inherently governmental functions; whether or not what the contact center staff will be performing are inherently governmental functions. In fact, the contact center employees will not counsel or screen out potential charge filers regarding whether or not they have a charge of discrimination. They will be screening in inquirers in respect to providing them access to the Commission. Neither will they be expected to answer questions related to complex issues of employment discrimination. Customer service representatives will be trained to recognize more complex factual inquiries, and refer those, seeking an interpretation of the law or a set of facts to our field offices. The customer service representatives will describe the laws the EEOC enforces, serve as a clearinghouse for information on employee rights and employer responsibilities, provide information on how the investigative process and mediation work, give the location and telephone numbers of our field offices and the hours of operation, provide case status information, and file disclosure information, provide referral information for other agencies, and provide responses to requests for training and education. Most calls to the EEOC cover these subjects. However, if a caller wants to discuss a potential charge of discrimination, the customer service representative will collect the information, record the pertinent information using a web-based inquiry assessment tool, and forward the information to the appropriate EEOC office for follow-up. We

also note that our determination that contact center representatives will not be performing inherently governmental work is shared by many other agencies with public information centers who have contact centers staffed or operated by contractors.

Additionally, there does not appear to be a clear understanding displayed in this report about the underlying fundamentals of the EEOC Assessment System (EAS). The EAS is an EEOC developed web-based e-government application which walks the user through a series of questions to determine whether EEOC is the most appropriate agency to provide assistance and, if appropriate, allows the user to electronically submit information related to his/her potential charge of employment discrimination to the proper EEOC field office for follow-up. It is an independent stand-alone system which will be made available to the public in calendar year 2006. When the NCC opened, it was decided that the NCC would pilot the EAS. Based upon experience to-date, changes have been made to capture information requested by the field.

The purpose of the EAS is to provide assistance in determining whether the potential charge meets high-level jurisdictional requirements prior to submission to a field office. The primary goal is to help filter-out those inquiries which are clearly outside of the jurisdiction of the EEOC, thereby reducing staff resources needed to respond to these inquiries. The EAS was purposely designed to require that an Intake officer follow-up with the potential charging party to review the allegations and circumstances and make the final decisions and recommendations related to EEOC jurisdiction. The system errs on the side of caution, allowing the field staff to make the final determination – for example if the potential charging party is uncertain regarding the number of employees in the respondent organization, it assumes that the allegation “passes” this test so that the intake officer can further discuss and clarify this with the user directly. A primary concern was that the EAS not discourage potential filing of a charge based on unclear user response information or complex jurisdictional issues.

Likewise, the e-Questionnaire component of the EAS was purposely designed to provide basic information about the inquiry to a field office, so that the office would have the primary information required to prepare for a follow-up interview. Considerations were made that, as an e-government application which will ultimately be available for public use over the Internet, the questionnaire needed to be simple and short. Again, it was determined that detailed information was best gathered during the formal interview process. The questionnaire forwards information from the assessment and provides basic contact information along with text boxes to describe what happened (asking who, what, when, where) and why the individual feels that the action(s) were discriminatory. The EAS design workgroup, which was comprised of both headquarters and field staff, felt that the information submitted in the questionnaire was sufficient to allow the intake staff to properly prepare for the required follow-up interview. Another consideration was a very strong political concern that the EAS not be considered as a formal mechanism for filing a charge of employment discrimination, as this may be seen to reduce the roll of the intake investigator. The system should be viewed as a mechanism for submitting an inquiry to the EEOC for follow-up, not as a mechanism for making final jurisdictional determinations and filing a charge. This is the role of the investigator.

4. *Inconsistent with policy, the "hot line" transfers of callers from the NCC to the appropriate office are often not within the period of 30 days prior to the expiration of the SOL.*

CSRs know they should transfer callers to the EEOC office when they are within 30 days prior to the SOL expiring. It is possible that calls are forwarded in error due to lack of standardized written procedures at the NCC. Managers in one EEOC office said that transferring these calls outside the designated window can create unrealistic expectations on the part of the caller and creates extra work for the office because employees must stop everything to address an issue that is often not truly urgent.

There are standardized written procedures, but the EAS has a built-in mechanism for triggering hot-line calls. If the caller is calling within a 60-day window, 30 days on either side of the projected deadline for filing a charge, the EAS system generates a message to contact an EEOC field office immediately and the NCC initiates a hot-line transfer. The field office can then make the determination, not the NCC, whether filing a charge would be timely. In order to preserve the rights of individuals calling the NCC, it is better for the NCC to err on the side of referring too many calls rather than too few calls.

Page 34: *Information Forwarded to the EEOC*

Our call monitoring analysis shows that of the 50 percent of calls that are sent to EEOC, 62 percent (31 percent of all calls) are related to 'filing a claim' issues, which could have been forwarded by the EASQ.

Page 39: *Some CSRs lead customers to fill out the EASQs while others lead customers to contact the EEOC office. Only 25 percent of the customers who called to file a charge actually completed the EASQ. The remaining 75 percent were asked to contact the EEOC office directly.*

The NCC data show 89,813 or 29.7 % of the 302,622 transactions handled by NCC staff from March 21, 2005 and March 31, 2006 were sent to the EEOC field offices. When the NCC opened, a caller whose concerns appeared to be within EEOC's jurisdiction and who wished to file a charge was given 4 options: (1) to send a signed letter to the appropriate field office with all the necessary information for a minimally sufficient charge; (2) go through the E-Assessment System; (3) have the NCC staff take the information and forward it to the appropriate field office; or (4) the CSR would provide information on contacting the field office and its intake procedures and hours of operation and the caller could call the office or visit as appropriate. As more offices began to direct first-time callers to the NCC, the CSRs encouraged more callers to go through the EAS. The table below shows the increasing use of EASQs.

MONTH	NUMBER OF EASQs
April 2005	1,979
May 2005	1,676
June 2005	1,923
July 2005	1,746
August 2005	1,950
September 2005	1,578
October 2005	1,610
November 2005	1,788
December 2005	1,843

January 2006	2,668
February 2006	2,472
March 2006	3,829

Page 35: *Change Management*

Finally, some Investigators do not understand why NCC cases get higher priority than other customers and believe that giving the NCC cases special treatment communicates the wrong message since “all calls are important not only those to the NCC.”

We agree that all calls are important and think that the timeframes established for responding to NCC inquiries also should be the goal for inquiries received directly by the field offices.

Page 36: *Training*

Survey respondents indicated they believe that the CSRs need more training. They recommended topics including handling irate customers, EEOC jurisdiction (including application and interpretation of the laws the EEOC enforces), repositioning, antidiscrimination laws, identifying issues and basis for discrimination, Title VII and other statutes, and Federal sector cases.

NCC staff receive two weeks of classroom training and on-the-job training on all of the above. In addition they receive periodic refresher training. When scripts are revised or new scripts developed these are discussed with and explained to the staff. The existing training program resulted in an ACSI index of 84 for the NCC staff.

Page 38 *Complaints about Offices*

Many employees in the field believe that not having access to a toll-free number has created a barrier between EEOC and the CPs because of the long-distance expenses.

All callers are able to contact field offices by making collect calls. All field offices are aware that they can accept collect calls to ascertain the caller’s information and have a staff member return the call to the CP so that there is no long-distance fee incurred by the caller. In addition, OFP is exploring the feasibility of establishing district-specific toll-free numbers for customer contact to defray the cost of long distance calls.

Page 38 *Access*

The NCC has two Spanish speaking CSRs; therefore, Spanish callers are usually guaranteed the ability to communicate in Spanish.

As of Friday, April 15, 2006, the NCC has eight Spanish-speaking CSRs.

Page 39: *Customer Experience* (paragraph 3)

Customers who do not complete the EASQ have to contact the EEOC offices directly. Their experience would be no different than it would have been pre-NCC, e.g., calls not answered by a live person, mailboxes may be full, etc. There are no standard procedures to handle calls related to taking information related to a charge.

Over 70% of the calls to the NCC are handled entirely by the NCC, not referred to an EEOC field office. Those customers have a different experience than they would pre-NCC, receiving quick and accurate information or referrals. Callers are given three options, as discussed earlier, for contacting EEOC field offices. Further, as the NCC handles more calls, fewer calls are made to EEOC field offices, providing a greater likelihood that the call will be answered.

Page 40:

6. Information about general overviews and inquiries is fairly consistent and accurate; however, other specific information is not consistent or accurate.

CSRs have 800 scripts that they reference.

Page 49

6. The NCC should adjust their internal processes to achieve better efficiency, consistency, and quality of service. Part of this involves better use of available technologies.

We reject the notion that the NCC should expect CSRs to be proficient users of 800 scripts in communicating with the public.

The report uses a highly inflated and inaccurate number of scripts. The NCC uses 119 Internal Scripts (in both English and Spanish) 163 FAQs, and 121 reference database IDs in the Right Now tool. The reference database has contact and coverage information for EEOC field offices and Fair Employment Practices Agencies (FEPAs). In addition, they have internal web access to information about other federal agencies, their programs, and EEO counselor contact information. This is a very manageable volume of reference materials, given the electronic mechanisms in place to facilitate quick access and retrieval.

Page 40:

7. The Customer Satisfaction Index is above average when compared to other Federal agencies or the service industry. However, due to the lack of baseline data we cannot assess whether this is an improvement from pre-NCC.

The customer satisfaction survey was conducted to establish baseline data for the NCC. The report characterizes an ACSI in the low 80's as rare. The ACSI index for NCC staff was 84.

Page 41:

Scheduling--Blue Pumpkin/Accent

The NCC used 'Blue Pumpkin' until recently for scheduling purposes and is in the process of converting to 'Accent.'

The NCC switched from 'Blue Pumpkin' to 'Aspect', not 'Accent.'

Page 41:

Scheduling--Blue Pumpkin/Accent

Also, according to CSR focus groups, the call volume is heavy in the mornings and light between 4 and 6 pm; however, the number of CSRs is constant throughout the day.

This finding is incorrect. As does any credible contact center, the NCC adjusts the number of CSRs based on the interval volume. Below is a CMS Interval report that the NCC commonly uses. The particular column to note is the one labeled "Avg Pos Staff.:" The figures in this column indicate that NCC staffing is heavier during the peak times and less during the early and late hours, to correspond to call volume.

Split/Skill Summary Interval - EEOC English																	
Date: 4/11/2006																	
Split/Skill: EEOC English																	
Time	Avg Speed Ans	Avg Aban Time	ACD Calls	Avg ACD Time	Avg ACW Time	Aban Calls	Max Delay	Flow In	Flow Out	Extn Out Calls	Avg Extn Out Time	Dequeued Calls	Avg Time to Dequeue	% ACD Time	% Ans Calls	Avg Pos Staff	Calls Per Pos
Totals	:15	:44	1213	7:09	1:23	26	3:22	0	0	119	1:22	0	60.48	97.90	22.2	55	
6:30 - 7:00AM			0			0	:00	0	0	0		0		.00		.2	0
7:00 - 7:30AM	:41	:26	13	5:44	1:16	3	2:00	0	0	0		0		71.84	81.25	5.8	2
7:30 - 8:00AM	:02		19	6:02	:42	0	:26	0	0	1	2:08	0		41.03	100.00	9.0	2
8:00 - 8:30AM	:01		26	5:13	1:20	0	:19	0	0	2	:24	0		53.92	100.00	17.3	2
8:30 - 9:00AM	:35	:38	57	6:42	1:33	3	2:38	0	0	7	1:59	0		80.28	95.00	18.5	3
9:00 - 9:30AM	:12		52	6:17	1:21	0	2:13	0	0	6	1:10	0		59.78	100.00	25.1	2
9:30 - 10:00AM	:01		62	7:52	1:21	0	:24	0	0	5	1:55	0		64.44	100.00	28.4	2
10:00 - 10:30AM	:03		66	7:59	1:15	0	:40	0	0	3	1:00	0		61.66	100.00	33.7	2
10:30 - 11:00AM	:09	:09	59	7:26	1:23	1	1:36	0	0	2	2:25	0		65.88	98.33	30.7	2
11:00 - 11:30AM	:20		68	7:04	1:25	0	1:56	0	0	10	1:42	0		51.19	100.00	32.0	2
11:30 - 12:00PM	:24	1:08	63	7:18	1:25	2	2:13	0	0	5	1:05	0		64.92	96.92	30.3	2
12:00 - 12:30PM	:11	:34	84	6:19	1:19	4	1:51	0	0	14	1:18	0		73.66	95.45	30.5	3
12:30 - 1:00PM	:47	1:19	78	7:30	1:25	3	3:22	0	0	8	1:55	0		76.02	96.30	29.5	3
1:00 - 1:30PM	:13	:09	74	7:14	1:25	2	1:16	0	0	7	1:36	0		78.68	97.37	27.4	3
1:30 - 2:00PM	:20	:56	69	7:29	1:24	3	1:24	0	0	12	:58	0		74.45	95.83	28.7	2
2:00 - 2:30PM	:49	1:03	75	7:17	1:24	3	2:57	0	0	12	1:08	0		71.21	96.15	30.5	2
2:30 - 3:00PM	:04		57	7:01	2:17	0	1:47	0	0	4	:42	0		50.59	100.00	31.9	2
3:00 - 3:30PM	:01		66	6:52	1:07	0	:38	0	0	6	1:02	0		59.09	100.00	30.6	2
3:30 - 4:00PM	:11	:24	73	7:34	1:14	2	1:14	0	0	4	:33	0		67.03	97.33	30.5	2
4:00 - 4:30PM	:02		54	6:28	1:18	0	1:06	0	0	3	1:05	0		50.16	100.00	26.1	2
4:30 - 5:00PM	:00		31	6:31	1:15	0	:00	0	0	0		0		35.54	100.00	25.2	1
5:00 - 5:30PM	:00		23	8:14	:53	0	:01	0	0	3	1:07	0		35.86	100.00	19.6	1
5:30 - 6:00PM	:00		17	10:00	2:27	0	:00	0	0	4	2:18	0		35.99	100.00	17.7	1
6:00 - 6:30PM	:03		13	9:38	1:43	0	:36	0	0	0		0		43.99	100.00	10.1	1
6:30 - 7:00PM	:00		10	5:20	1:00	0	:00	0	0	1	2:08	0		28.69	100.00	7.0	1
7:00 - 7:30PM	:00		4	9:16	:36	0	:00	0	0	0		0		64.69	100.00	1.0	4

Page 41:
Timekeeping/Deltek

The NCC uses Deltek for timekeeping purposes. However, the process in place requires a significant amount of manual entry and is recorded in three different places: an Excel spreadsheet, the timekeeping system, and paper copies. There was no valid reason provided for

these manual activities. Aux codes (codes generally used on switches to track CSR time) are not used, resulting in tracking CSR times manually.

NCC timekeeping procedures require CSRs to enter their time into the Deltek Timekeeping system as well as turn in a paper copy to their supervisor on daily basis. The paper copy is reviewed by management each morning to ensure that the time was recorded accurately (which would include tasks charged to, staff time, leave reasons, etc.). The internal spreadsheet is used to track absence reasons (i.e. sick, recurring, approved, unapproved, vacation, etc.). Aux codes are used for correspondence and TTY tasks which could be considered "off phone" tasks.

Page 42: *Call and Contact Management/General Reporting - Avaya and RightNow*

Switch Reports – Daily, weekly, and monthly reports on call attributes like speed of answer, abandoned calls, etc. These metrics are reported to the EEOC on a monthly basis. In a typical call center, interval reports (call metrics for every half hour) are produced and used to manage the floor. These reports were not available for this program.

Page 42: *Call and Contact Management/General Reporting - Avaya and RightNow*

CRM Reports from RightNow – These reports show contact by State, channel, action taken, topic, etc. These reports are sent to the EEOC on a monthly basis.

Switch and CRM reports are provided to EEOC on a weekly and monthly basis. Interval reports are used daily and are an absolute necessity in managing the floor.

Page 42: *Agent Performance Management -- No Particular Tool*

Agent performance management is not standardized. The Site Director said that the team leaders and the staff members have meetings once a week to discuss monitoring scores, changes, and general questions. However, the CSRs denied this. The CSRs said they do not have any one-on-one coaching sessions. Their coaching is more like refresher training.

This finding is incorrect. The Site Manager stated that the Lead Staff meets a couple times a week to discuss any open issues including quality, new content, employee issues, etc. Coaching takes place daily and is conducted by the Lead Staff and Tier 2 group. The NCC believes the auditors misunderstood and think that all employees are brought into a meeting once per week to discuss quality. Quality and monitoring are discussed on a one-on-one basis. Based on monitoring results, CSRs are provided with one on one coaching. Refresher training classes take place as well as one on one coaching.

Page 42:: *Agent Performance Management -- No Particular Tool*

A reporting relationship between a team leader and a CSR does not exist. CSRs can approach any team leader with any questions. The NCC does not use any agent scorecards or other performance metrics to review the performance of the CSRs. The only type of measurement used is through call monitoring, which the CSRs say they receive once every two months.

While CSRs can approach any member of the Lead Staff, the Site Manager provided to the audit team a map document that identifies to whom each CSR reports. Each monitoring session results in a completed monitoring scorecard. CSRs are also provided with their talk times and ACW measurements several times per month. If there are issues with a particular CSR, then more attention is given as well as coaching and review of statistics.

COMMENTS ON RECOMMENDATIONS

Page 50: *EEOC Recommendations*

8. *Develop methods to increase awareness of the NCC.*

In addition, the planned advertising campaign is important to increase awareness of the toll free number. Another possibility is to modify the EEOC's home page to clearly display the importance and relevance of the NCC to customers. Presently it is listed under the banner and under the link for "Contact Us." To encourage initial customers to contact the NCC, they need to be shown the benefits of contacting the NCC before calling the EEOC offices.

This action was included in the marketing plan which was provided to the evaluators.

Page 51 *EEOC Recommendations*

9. *Implement Change Management Practices*

The existing NCC Newsletter might become an EEOC/NCC newsletter with information from both organizations.

This has been the intent from the beginning. The Newsletter is a joint EEOC/NCC effort to show the role both field office and NCC employees play in serving the public.

Page 54: *Methodology Details* (paragraph 7)

Electronic Survey

The day after the survey was launched, the EEOC sent a National Contact Center Newsletter to all employees. One week after the survey was launched (and coincident with the first reminder emails) the EEOC sent a report describing NCC activities for the month of January. We raise the possibility that sending this information could have been perceived as an effort to influence survey responses and therefore negatively influenced our response rate and/or the responses.

Had the survey been launched as originally scheduled there would not be the possibility of such a perception.

Page 56: *Appendix C. Trend Information Desired by EEOC Offices*

The following of types of trend information listed in Appendix C can be generated by EEOC field offices:

- Listing by month of EASQs the EEOC offices receive**

Number of EASQs that actually become charges (provided that they have been properly coded in IMS)

The following types of trend information is now provided :

Number of calls screened out by the NCC phone tree and number screened out by the CSRs

Number of calls not referred to EEOC Offices (screened out)

The following trend information is now provided for EEOC as a whole but can be provided on an office basis:

Overall number of calls forwarded to each EEOC office

Demographic trend reports are being developed. Much of the information Directors indicate they would like to receive is operational information about the NCC that EEOC Project Manager is disseminating in monthly reports.

OFP - Metrics

From: NICHOLAS INZEO [NICHOLAS.INZEO@EEOC.GOV]

Sent: Monday, May 01, 2006 7:44 PM

To: ALETHA BROWN; LARKIN JENNINGS; MILTON MAYO

Cc: ANGELICA IBARGUEN; BERNICE WILLIAMS-KIMBROUGH; CARI DOMINGUEZ; CARLTON HADDEN; CHESTER BAILEY; CHRISTINE GRIFFIN; CYNTHIA PIERRE; DANNY HARTER; DEIDRE FLIPPEN; EDISON ELKINS; FEDERICO COSTALES; GABRIELLE MARTIN; HARRIET EHRLICH; JAMES LEE; JAMES NEELY; JEAN WATSON; JEANETTE LEINO; JEFFREY SMITH; JOHN ROWE; KARIN PEDRICK; KATHARINE KORES; LEONORA GUARRAIA; LESLIE SILVERMAN; MARIE TOMASSO; MICHAEL FETZER; NAOMI EARP; OLOPHIUS PERRY; PEGGY MASTROIANNI; REUBEN DANIELS; SALLIE HSIEH; SPENCER LEWIS; STUART ISHIMARU

Subject: Re: Draft Rpt NCC Evaluation 4/7/06: Comments Requested

Attachments: EEOC NCC Metrics.doc

Aletha, Milt and Larkin,

In my memorandum to you of April 21, 2006, I commented on the preliminary draft of the NCC evaluation. On page 11 of my comments, I state that the evaluation of the NCC should have been made against the performance standards set in the contract that the Commission approved. I am attaching what I was given that lists the performance standards to be met by the NCC contractor. Again, we would be happy to meet with you if you have any questions.

Nick Inzeo

>>> INSPECTOR GENERAL 4/7/2006 4:46:27 PM >>>

Attached please find NCC Transmittal and Draft Report. Comments due 4/21/06.

EEOC NCC – Performance Measures and Metrics

Performance Metric	Expected Target	Frequency of Reporting
Call Quality Monitoring – Soft Skills	90%-95% CSR score on calls monitored	Monthly
Customer Satisfaction – Waiting on OMB approval	70%-75% satisfied or extremely satisfied	Monthly
Accuracy of Capturing Information	95%-97%	Monthly
Accuracy of Information Provided	95%-97%	Monthly
Service Level – Average Speed of Answer	70% to 80% calls answered in 30 seconds or less	Monthly
Average Speed to Respond to Written Correspondence	70% to 80% in two business days	Monthly
Average Speed to Respond to Email	70% to 80% in two business day	Monthly
Average Speed to Respond to Facsimile Transmissions	70% to 80% in two business days	Monthly
Blocked Calls	1% to 3%	Monthly

Office of Research, Information and Planning Comments on

**Evaluation Report: *The EEOC's National Contact Center: an Evaluation of its Impacts*
Draft Prepared by Job Performance Systems, Inc., April 7, 2006 for
EEOC Office of Inspector General**

ORIP has reviewed the draft report on the National Contact Center (NCC) prepared by Job Performance Systems, Inc., and has provided many specific comments below. Although we believe that the program evaluation generally focuses on the fundamental criteria stated in the original Task Force report of the feasibility of a contact center, there are many analytical areas and conclusions stated that fails to measure the impact of the NCC. We believe that the evaluation does not utilize direct measures of the NCC's impact and, unfortunately, does not apply an appropriate research design and statistical techniques to isolate these effects. We believe there were opportunities to use better, and more appropriate analytical approaches. By not doing so, the study includes a number of unsubstantiated findings and recommendations that do undermine its usefulness to answer the fundamental issues on which it intended to focus.

As you review our specific comments, there are a few over arching concerns and themes that influence the report's strength and value to the EEOC:

1. The evaluation fails to use charge and inquiry data available in the IMS that is directly relevant to the evaluation. The evaluation fails to construct relevant time period analyses and relies instead on fiscal year data rather than time periods that are more relevant to the actual NCC implementation dates. It fails to establish other types of controls to isolate the impact of the NCC, such as variations in its use by geographic areas and differences in field office implementation.
2. The evaluation clearly uses multiple measures of program impact, which is a recommended technique in program evaluation⁴³. However, the evaluation covers so many objectives that it reduces an in-depth analysis. For example, the need to examine the impact on "controlled correspondence" does not appear to be as critical as other objectives. Also, it does not appear that there was an attempt to prioritize, and gain some agreement on, the most important objectives.
3. We have some concern that the type of program evaluation conducted does not adequately provide the type of evaluation that would be most appropriate for the Office of Inspector General, even though there is some limited analysis in a number of areas. For example, the study lacks any cost assessment type of analysis, such as those that could provide cost/benefit ratios or similar measures⁴⁴ or compare the cost/benefits of alternative approaches.

⁴³ See for example, *Practical Program Evaluation for State and Local Government Officials*. by Harry Hatry. Richard E. Winnie and Donald M. Fisk. 1973.

⁴⁴ It is assumed that this evaluation was assigned to the Office of the Inspector General due to the financial relationship between the NCC and the Commission. For example, see the OIG requirement to "recommend policies for, conduct, supervise, and coordinate other activities carried out or financed by the Commission for the purpose of promoting economy and efficiency in the administration of, or preventing and detecting fraud, waste, and abuse in **Job Performance Systems**

4. Most of the report's conclusions rely on input from Commission staff regarding perceptions rather than direct measurement. This makes the data collected very imprecise and more impressionistic than empirical.
5. In that regard, we also believe that the report does not contain enough of the data that it did review, which would provide some justification for the statements made in the report (although we are not necessarily endorsing those statements for the other reasons we have mentioned). As just an example, it would be important for the report to include the actual survey administered and a grouping of the responses to each question, so that it can be referenced by the reader. Also, there are many places where a conclusion is stated, but it is not always evident what data/analysis supports the conclusion.
6. Finally, the study identifies many instances where performance information or measures are lacking or are unreliable. The inaccuracy and unreliability of data, if the study is accurate, raises troubling implications in many areas of the agency's work and planning. We believe that this is important to address regardless of the final results discussed in the study.

Detailed comments are provided below.

Page i: Throughout the report, it is not clear what the period covered with the data and data analyses. As an example, in the Executive Summary, the *Approach* section does not provide a context for the statements made about baseline data or what time frame the evaluation analyzed. This deficiency carries through the *Methodology* section of the full report, for example, as well as other areas of the report.

Page ii: A statement is made in the first paragraph ("Unsolicited calls that were originally ...") seems to conflict with, or is confusing when compared to, the statement in the 4th paragraph ("Third, most of the offices are still taking unsolicited calls ...").

In the 5th paragraph, there seems to either be a violation of the contract or the evaluator was not provided with information, if it was requested ("In addition, the NCC does not provide regular trend reports ..."). Also, in the 4th paragraph, the study seems to raise another contract aspect, if accurate ("Second, the NCC is referring many calls ... to EEOC offices rather than completing the appropriate form ...").

Page iii: 3rd paragraph mentions CSR "soft" skills, which is also discussed in the full report. This does not seem to be well described. What is the difference between soft and hard skills that are expected? Also, based on the parameters of the NCC contract, is the study assuming the function of the NCC should involve these soft skills? Some of the later recommendations made may go beyond what the EEOC initially envisioned for the NCC staff; for example, "taking" a charge. The study seems to make recommendations for the agency to consider that approach for the NCC, but it seems that the study should also assess the NCC and its impact on EEOC offices for the purpose for which EEOC intended to use it.

Page iv: In the 2nd paragraph under item #3, the study suggests here and in the main report ways for the EEOC and NCC staff to better communicate and share knowledge and information. There are also other aspects of job duties and responsibilities suggested throughout the report; for example, the area of CSR duties and responsibilities discussed above for page iii. Throughout the report, the study does not address a concern about turnover that often can occur with call center employees (this has been raised in GAO studies on call centers and was referenced in the Task Force report in its review of call centers). The study does consider cost and quality aspects, if there is extensive turnover over a year, for example, in training and constant monitoring to ensure quality if CSRs are expected to deviate from scripts. Although this may be a good suggestion, the study needs to address this variable if it recommends more responsibilities for NCC staff than were originally contemplated.

The study often mentions “Tier 1” and “Tier 2” (2nd paragraph under item #4) but does not adequately describe what the tiers mean and want activities they constitute.

Page v: The evaluator’s claim, “. . . there are no reliable metrics to evaluate the impact of NCC on EEOC operations.” If there are no such metrics their very strong recommendations are without basis, and the evaluation instead should have focused on specifying the necessary data needed. In evaluation terminology the report should have been what is referred to as an “evaluability assessment”.⁴⁵ However, there are data sources and research design alternatives that undermine the claim that there is insufficient data.

The Summary in item #7 and in the full study it mentions the need for developing “reliable metrics” but does not provide sufficient guidance or examples (the minimal examples provided on page 49 do not strike us as sufficient since the lack of metrics seems to be a major issue in this study). If nothing else, the study should provide references to articles or other documents that could be invaluable in developing the type of metrics they recommend.

Page 2: The study begins with a methodology section that basically discusses the lack of data. There are two major concerns here. First, discussing data before what needs to be measured is not a useful process. It would seem more appropriate to clearly state the objectives to be measured and then later point out which measures lack sufficient data.⁴⁶ Second, the discussion fails to seriously consider the use of IMS (charge tracking) data as a possible source of information.

Page 3: The study fails to recognize natural control groups that would have provided an ability to isolate NCC impact. The study states,

Another strategy we explored was to identify whether some offices could function as control groups. However, this proved impossible due to the way the NCC has been rolled out over time. The EEOC set up seven offices to pilot the NCC for one month and then commenced implementation across all offices on March 21, 2005. Beginning November 29, 2005, the EEOC gradually authorized offices to change their telephone voice message to redirect all first time callers to the NCC.

⁴⁵ See for example, Pamela Horst, Joe N. Nay, John W. Scanlon and Joseph S. Wholey, “Program Management and the Federal Evaluator”, *Program Evaluation: Patterns and Directions*, Eleanor Chelmsky, editor, American Society for Public Administration, 1985.

⁴⁶ A useful example of such an exercise can be seen in *Measuring the Effectiveness of Basic Municipal Services, Initial Report*, The Urban Institute and International City Management Association, 1974.

This initiative started with eight local offices and has since been gradually expanded to include all offices. The extent offices redirect callers is left to the discretion of each office. As a result of this implementation methodology, there were no comparative treatment/control groups to evaluate impact.

The incremental implementation⁴⁷ offers an excellent opportunity to use research designs like “interrupted time-series” to see how charge behavior varies after use of the NCC is introduced.

Page 5: Already mentioned, but the NCC had not collected customer satisfaction data that was required in the contract. The study mentions an experimental measure but provides no specifics. Even though the evaluators abandoned it, it would be useful to have information about what they tried and why they abandoned the effort. They recommend elsewhere that the EEOC develop metrics, and it would be very useful to have this information as a learning experience.

Page 9: The study describes the inconsistency in capturing customer information. If accurate, this may be another contractual area needing review.

Page 10: The row in the table dealing with call duration is not useful and should be translated into common measures like mean or median duration of calls. In addition, if the categories used for 2003 estimates are part of the contract performance measurements the NCC were required to meet, the study should also present the results in these categories to evaluate how well the estimate tracks the actual findings. Both the common measures and the actual comparison to contractual performance measures would be useful.

Page 12: The study used fiscal year data here, even though implementation of the NCC was not based on the fiscal year. In examining controlled correspondence, the study concludes,

There is no clear reason for the changes [in controlled correspondence]. It is possible that complaints have reduced because the NCC is providing better customer service, but it also may be that the EEOC website is enabling people to more readily contact the field office rather than going through headquarters.

The purpose of program evaluations is to establish causality between a program and an outcome.⁴⁸ It is the evaluator’s responsibility to determine whether the observed change was due to the NCC or not. One would expect an evaluation to measure alternative explanations of change rather than just speculating about them.

Similarly, the report notes that there are reductions in the use of the EEOC public telephone number and concludes that it cannot determine if the change is due to the NCC. The report cites lack of data, but does not clearly indicate the data that is needed nor are data and research design alternatives explored. Further, the evaluator appears to be measuring data for three months and is not tying NCC incremental implementation to the measure.

⁴⁷ For the purpose of these comments, references are made to incremental implementation which refers to the fact that the NCC was not implemented at the same time and in the same way in all field offices.

⁴⁸ See for example, Laura Langbein’s *Discovering Whether Programs Work: A Guide to Statistical Methods for Program Evaluation*, Goodyear Publishing, Santa Monica, California, 1980. p. 40.

Page 13: The discussion of website use suffers from the same problems. Very simple measures of use are provided. There are no efforts to control for factors other than the NCC that might explain increased use and there is no recognition of incremental implementation. The report states, “The total number of visitors to the EEOC website has increased over the past five years, reflecting what we were told is a typical growth pattern for Federal websites.” The language suggests a steady increase. But instead Table 7 demonstrates that after a 38 percent increase in use from 2002 to 2003, there is just a 6 percent increase from 2003 to 2004, followed by a 23 percent increase from 2004 to 2005. Clearly something very different occurred during this time period. Social science practice requires that statements such as “we were told” be clearly substantiated and cited.

Again, with respect to publication requests, fiscal year data is used rather than direct tracking to implementation or accounting for variation in NCC use by geography. (An example of the latter might be that if more individuals from California are using the NCC are more individuals from California requesting publications?)

Page 14: After examining/providing a graph of charge data, the evaluation concludes that, “While there are monthly differences in total receipts, the overall pattern of receipts across each of the 12 months has remained fairly consistent.” There are no analyses provided that supports this conclusion. There are no models offered to explain charge behavior and there is no attempt to isolate differential use and/or implementation of NCC to specific rates of charge receipts. Also, once again there is reliance on fiscal year data. To examine causality between charge statistics and the NCC requires an elaborate model of charge behavior and sophisticated statistical analyses, neither of which is presented here. This is a very important issue for the Commission’s use of an NCC and the analysis provided does not adequately address the issue and its complexity.

Page 15: Figure 2 attempts to provide data in a graphic format which is not very reader friendly. A data table would be helpful.

There is also a conclusion presented here that, “While outreach efforts have increased, there is only anecdotal indication of any impact attributable to the NCC.” To reach this conclusion, the evaluator apparently uses conversations with or a survey of our Program Analysts. In order to determine a relationship between NCC and outreach, the evaluator clearly should have used participant input or similar data to reach this conclusion.

Page 16: Here the evaluator observes that there “may be insufficient awareness of the NCC.” Again the evaluator measures awareness using our staff’s beliefs not empirical evidence. A more reliable source of data would have been charging parties in open investigations. They should have been asked if they were aware of the NCC, if it is appropriate under the Paperwork Reduction Act to ask that type of question. In addition, given the other findings in the study about the performance of the CSRs, the recommendations about better interaction and information sharing with EEOC, and the need for consistency and accuracy of data, it seems that the study should caution against prematurely engaging in activities involving publicizing the NCC before resolving the other issues, if appropriate.

Page 17: Once again, the evaluation relies on perceptions about an outcome (in this instance call volume) rather than real measures and even with that, the report does not provide the statistics

collected from the survey. There is no attempt to distinguish between these perceptions in areas where there is high per capita use of NCC versus low per capita use of NCC or similar efforts to isolate the impact of NCC.⁴⁹

Page 18: “Probing” needs to be carefully defined.

Page 19: The report makes the following observation.

From April through most of November 2005, customers could call either the toll free number (answered by the NCC) or the local number (answered by the EEOC offices). From November 2005 through March 2006, the EEOC gradually authorized offices to put a message on their voicemail redirecting first time callers to the NCC. When we conducted our survey, 4 of 30 offices (13 percent) were redirecting all callers to the NCC, 14 offices (47 percent) had put a message on their voicemail giving callers the option to call the NCC, and 12 offices (40 percent) were not redirecting callers to the NCC.

It would seem that such natural differences in the manner in which NCC was implemented provides an opportunity to measure differences. That is, do calls received vary with the way the field office directs calls to NCC? Unfortunately, the report fails to utilize this. For example, once calls were redirected in a specific District Office did the proportion of calls drop relative to a District Office that had not redirected their calls?

The report indicates that “50 percent of calls were resolved at the NCC”. It would have been useful to measure and report the following factors.

- The stability of this 50 percent figure over time.
- The cost of referring 50 percent of calls to the NCC when they cannot be resolved there (for example, the number of days lost by the potential charging party).
- Whether the failure to resolve 50 percent of the calls resulted in “tolling” issues for the potential charging party.

Page 20: To determine if the type of calls received by our staff changed as a result of the NCC, it appears that the evaluator just asked our staff if the nature of calls changed. Such measures would appear to be very unreliable. Again direct measures should have been used. Given the probable lack of pre-NCC data, it might be necessary to instead measure if the increased use of NCC is related to the nature of calls received. Calls received must be captured more than just from our employees’ recollections.

Also the report states that, “In addition, during our interviews and focus groups we did not detect any clear indication of change in the types of calls employees are answering pre/post the NCC.” Focus groups seem useful for developing issues, problem areas and hypotheses for evaluation studies but are not such useful avenues for collecting impact data as done here.

⁴⁹ Clearly some effort needs to be added to control for differences in the size of the populations being served by our District Offices. Per capita refers to this type of control such as NCC contacts per 1,000 individuals in the workforce for the District Office’s jurisdiction.

Page 21: The evaluation makes some observations about how there are disparities in the NCC staff's perceptions about program objectives. The reader would benefit from an explanation of how these differences in perceptions affect the impact of the NCC.

Page 23: In this section there is a discussion of the NCC requirement to identify trends. There is an observation that there is no automated way to identify trends. This raises a few issues. First, this appears to be a major deficiency where the NCC may not be meeting simple contract requirements. Second, the type of data that is being collected should be described. Third, it would appear that the evaluation should be utilizing this data, yet there are no references to it.

Page 24: The following statement is made, "Of the 15 offices, 8 [field offices] indicated that the labor savings resulted from fewer incoming telephone calls and 2 offices indicated that Investigators who were answering 'cold calls' now have more time to spend on investigations." The evaluation would have been much more useful, had it explored the differences in greater detail. What actually enabled those two offices to have more time for investigations? Are they different than other offices with respect to process, workload, number of people in their jurisdiction using the NCC or some other factor?

Another interesting statement here is that, "Many commented that they have increased responsibilities [as a result of NCC], in part because the NCC is only providing bare bones support by taking phone messages and relaying information unless the call is blatantly non-jurisdictional." It would have been useful to report the actual number and percent rather than just "many".

Page 25: Table 11 presents the data in an odd way using grouped data. One would certainly want to know the actual mean and/or median and the total number of responses. The report also makes the following observation, "Thirty nine percent of survey respondents involved in intake reported that relatively many (more than 20 percent) of the EASQs they review are for PCPs who already have an inquiry in the IMS and therefore should not have been forwarded as an EASQ." Here and in other places there is the use of the term "relatively many" (or "relatively few" in other places) to refer to closed ended survey response which seems to actually be "more than 20 percent". It is more transparent to report the actual response rather than labeling it "relatively many". The real problem and the reason that the language is so awkward is that the evaluators fail to use a direct measure and are again relying on perceptions. Direct measurement if just from a sample of EASQ's would have been a more defensible way to measure this problem.

Also, as noted earlier, the study analyzes the duplication of work but mixes up two important concepts. If the work assigned to the NCC and the CSRs is inaccurately done, given the guidance provided by the EEOC (scripts, training on script language, etc.), then that needs to be rectified so that field office staff does not have to do duplicate work or correct inaccuracies that should have been caught. However, if the study is suggesting that the duplication is because the NCC/CSR needs to assume other responsibilities beyond what EEOC envisioned for them, such as "take" the charge itself, they need to address this area both ways: the way the EEOC wanted it to work and based on their recommendation on how to make it work more effectively and efficiently. Also, see pages 27 and 30 for examples of this same point.

Page 26: The same problem is repeated when discussing GroupWise e-mails. Direct measures rather than staff perceptions should be used. There is a statement that, "This perception by PCPs can affect Investigators and the PCP because it takes Investigators extra time to backtrack and

explain the limited role of the NCC.” Direct measurement of time to closure in our MIS data would be more telling than our staff’s perception about the perception of a PCP.

Page 27: Table 13 is very confusing.

Page 28-29: Although repetitive it is worth observing that direct measure of inaccurate, incorrect or incomplete EASQ’s is preferable to our staff’s perceptions of such things. The evaluator should have sampled EASQ’s and tested their accuracy and completeness. Also on page 29, by “reason for discrimination”, it is assumed that the evaluator means the issue in the allegation. Obviously, “reason for discrimination” is a very poor term to use.

Page 30: The report states that “. . . while monitoring calls at the NCC we observed that the CSRs do little probing to understand the validity and nature of the claim.” There is no explanation of how monitoring was done. One would expect an evaluator to develop, implement and document that this assessment was done in a scientific manner. Further, no statistics are reported here. Quantitatively, what does “do **little** probing” (emphasis added) mean? As currently stated this would appear to be just an unsubstantiated opinion from a non-expert.

Page 31: Reliance on perceptions rather than real data is a problem here as well.

Page 32: The following statement is made but it is unclear as to the source of the data, “Of the NCC calls that are sent to EEOC offices, 62 percent are related to filing claims and the remaining 38 percent are related to general inquiries, EEOC overviews, or claim status.”

Page 33: The following conclusion is reported, “The NCC staff believes that if they are granted the right access to the IMS and the technologies are integrated, they would have access to the information they need to resolve a higher percentage of the calls that are not related to filing claims.” It would be helpful to have more detail about what this means and how increased access would work. It is not clear, for example what “not related to filing claims” means. If it means people that just need one of our publications for example, how would access to IMS help?

Much like the statement on page 32, the source of the following statement is not transparent. “The NCC can improve the call resolution and thereby reduce calls to EEOC offices if they can resolve all the non-claim related calls. Only 66% of the calls that are related to ‘non-claim’ issues are resolved at NCC, the others are referred to EEOC offices.”

Page 37: The following statement would benefit from additional explanation or an example.

According to one Office Director, the NCC has institutionalized the delivery of customer service and now the customer service orientation happens every day; it is not just a one-time initiative. The short turnaround requirements by the NCC have heightened timeliness in responding to customers by phone or mail as well as customer service expectations, delivery and follow through.

Page 38: There are a number of conclusions presented without figures to support them. Statistics regarding, use of non English speakers, the number of field office that have reviewed their intake procedures, the number of customers that get a live person at the NCC and the number of CSR’s that have different views of their roles would be more beneficial than the current characterizations. Additionally, discussion of the lack of toll

free numbers at the office level does not seem to be a complaint about offices but about the technology that they are provided.

Page 39: The source of the data for Figure 7 is not clear. The legend may be a bit misleading. Should “EEOC Offices” actually be labeled “Asked to Contact EEOC”?

Page 40: There are a number of observations here that urgently need to be supported by actual numbers. See for example,

- Some CSRs are patient and listen to the customer for a long time without controlling the call, while others are impatient and cut off callers.
- Some CSRs have selected a few scripts that they use most often and refer only to those for all answers.

In another observation, the evaluation compares NCC customer satisfaction to a federal government standards and then states, “Since there are no baseline data, there is no way to know whether this is an improvement from pre-NCC.” Pre-NCC may be largely irrelevant; the contractor should have compared NCC satisfaction to satisfaction with EEOC intake by conducting their own survey.

Page 44: The calculations here regarding EEOC staff hours saved by the NCC would benefit from a more comparative approach by examining NCC staff costs versus EEOC staff savings. Is the 20 hours saved per office equal to the expenditures?

Page 46: Recommendations start here. Given the serious methodological problems, recommendations will have to be re-cast after the analytical portion of the report is corrected.

Page 48: The study recommends training on soft skills, which we already mentioned need to be more specifically defined. In addition, if the application of these skills require CSRs to deviate from scripts, the study needs to address recommendations if the EEOC retains its model of CSR involvement in interacting with customers vs. the alternative model recommended of CSRs possibly “taking” charges to reduce duplication of effort by EEOC staff.

Page 54: A copy of the survey instrument should be included.

Page 57: This appendix presents some definition of their projections – best case, most-likely and worst case. There is no documentation or explanation of how these figures were derived. It would be useful to have a more complete explanation of how they were generated.

Comments about the NCC Audit Report’s findings as they relate to data provided by OCLA

I reviewed the data on pages 12 and 13 of the NCC Audit Report, which relate to data OCLA provided to the auditor, and I disagree with some of the representations of the data and conclusions drawn.

(1) The report indicates that OCLA’s “data related telephone calls to the public EEOC telephone number over the past five calendar years have been kept following different assumptions and are not comparable.” I provided the auditor copies of summaries of the logs used to collect the data on OCLA’s phone calls for four years, not five years, FY 2002 and 2003 and calendar years 2004 and 2005. Beginning in 2004, the format of the phone logs changed, and specific categories of calls were added to the format. While the logs for 2002 and 2003 do not capture the same detail about the calls as do the 2004-05 logs, they do indicate how many calls were received, and therefore the data from those logs could have been used in the auditor’s analysis. However, they were not, which could have arguably affected the outcome of the report’s conclusions. The average number of calls received in FY 2002 was 2696 per month and the average for FY 2003 was 1984 per month. For calendar year 2004, the average number of calls per month was 2414. The average for calendar year 2005 is 1345. Thus, 2002, 2003 and 2004 phone call data are fairly consistent, and the 2005 data is more than 30% less than any one of the three preceding years. I, therefore, disagree, that the data are insufficient to determine that there is a reduction, and that the NCC is the reason for the reduction in the number of calls.

(2) The report indicates that “data from 2004 and 2005 are incomplete, but three months are comparable and each shows a reduction in total calls”. And the report goes on to cite three months’ worth of data in Table 6. It is true that there are some gaps in the data provided because the data is missing from OCLA’s records. However, there are, in fact, six months of data that can be compared, showing a more complete picture to provide a more thorough analysis, which documents that OCLA received many fewer calls in 2005 than in 2004, between 31% and 61% fewer calls. See chart below prepared by OCLA after receiving the audit report:

OCLA Calls – all categories

<u>2004</u>		<u>2005</u>		<u>number of fewer calls and %</u>
January	2190	1164	1026	47%
February	2994	1812	1182	39%
March	2587	1016	1571	61%
May	1943	1342	601	31%
June	2502	1616	886	35%
November	2268	1124	1144	50%

(3) In addition, the report shows only three months’ worth of partial data on calls related to field offices, and states that “the data showed a decrease for one month only and that there are not sufficient data to determine whether the call reduction can be attributed to the NCC.” However, OCLA provided the auditor useful data on two additional months (February and March), and

partial data on a third month (January), which were not referenced at all in the report. An analysis of this broader data shows a more complete picture and allows a more thorough, accurate analysis, documenting that OCLA received many fewer calls in 2005 than in 2004, which should be attributed to the NCC. See chart below prepared by OCLA after receiving the audit report:

OCLA Calls received and referred to field offices:

<u>2004</u>		<u>2005</u>	<u>number of fewer calls and %</u>	
January	140	90	50	36% fewer calls received
February	811	308	503	62%
March	665	189	476	72%
May	500	261	239	48%
June	missing	308		

(4) Finally, the report analyzed OCLA’s controlled correspondence records between 2003 and 2005, and the records indicate that there was a 30 percent reduction in correspondence received in 2005 when compared to either 2003 or 2004 data. The report chooses to state that “the correspondence decreased over the past three years”, which could suggest that the decrease has been a collective decrease. However, this it not the case. The number of letters received in 2003 is essentially identical to those received in 2004, and the number of letters received in 2005 is 30% less than those received in 2003 or 2004. It also goes on to say that “while it is possible that complaints (i.e., correspondence) have reduced because the NCC is providing better customer service, it also may be that EEOC’s website is enabling people to more readily contact the field office rather than going through headquarters.” I am not sure why they conclude this, because the website provided field contact information in 2003 and 2004, so that should not be a factor in explaining the reduction of congressional correspondence. Furthermore, we’re talking about letters addressed to Headquarters, which by their very nature are generally raising issues or concerns about the field’s handling of their cases. It is, therefore, unlikely that a reduction in these letters is a result of the website enabling people to more readily contact the field rather than going through headquarters.

The report also chooses to selectively break down the analysis in six month increments before and after the inauguration of the NCC, and concludes that there was an 8 % increase in congressional correspondence for six months post-NCC when compared to the six months pre-NCC, and from this the report concludes that the data provide mixed results for the past 15 months. Frankly, the report’s analysis of both the phone calls and the congressional correspondence, the use of cherry picked, selective data for the analysis, and the conclusions drawn from the analysis suggest to me that there was a concerted effort to search for negative results that would reflect poorly on the NCC.

Office of the Executive Secretariat (Exec. Sec.)

From: ALETHA BROWN [ALETHA.BROWN@EEOC.GOV]
Sent: Friday, April 21, 2006 3:12 PM
To: STEPHEN LLEWELLYN
Cc: LARKIN JENNINGS
Subject: Re: NCC Draft Evaluation Report

Thank you for your comments. This more recent data will be considered.

>>> STEPHEN LLEWELLYN 4/21/2006 3:08:47 PM >>>

The Executive Secretariat recently completed its 2nd Quarter Report on the Chair's Controlled Correspondence, and it contains more recent information than was available when we were contacted by Job Performance Systems as part of its evaluation of the National Contact Center. Thus, you may wish to consider our more recent data in considering the NCC's impact on correspondence.

For the 1st half of FY 2006, the Executive Secretariat processed 245 controlled correspondence items addressed to the Chair, compared to 279 items for the same period during FY 2005. The decrease was greater for field offices, which had a 16% decrease (126 items through March 31st compared to 150 items for the same time period in FY 2005) than for HQ, which dropped 8% (119 items compared to 129).

The decrease is greater if the 1st half of FY 2006 is compared to the 2nd half of FY 2005. The 126 items for the field represents a 30% decline from the 180 field items for the 2nd half of FY 2005. The 119 items for HQ offices is a 42% decrease from the 206 HQ items for the 2nd half of FY 2005. While there may be several reasons for the decrease in incoming correspondence, it seems likely that better customer service, increased outreach, establishment of the National Contact Center and the availability of information on the EEOC website may have resolved situations that in previous years would have resulted in written correspondence to the Chair. Stephen Llewellyn Acting Executive Officer Executive Secretariat

Office of Legal Counsel

MEMORANDUM

TO: Aletha L. Brown
Inspector General

FROM: Peggy R. Mastroianni
Associate Legal Counsel

SUBJECT: National Contact Center Evaluation Draft Report

We have reviewed the draft report “The EEOC’s National Contact Center: An Evaluation of Its Impacts.” We have two comments. 1) On page 10, the report compares the total calls projected in the 2003 Assessment Report with the 2005 actual projected calls, and notes that the 2005 number is significantly smaller than the 2003 number. We question the usefulness of the comparison and the significance of any resulting implications that the NCC has performed below expectations, since the NCC’s operations were only a gradual phase-in beginning in March 2005 and, we understand, intentionally did not include all calls to Commission offices. The 2003 Assessment Report projection covered was based on a field survey of all calls coming in to offices. It does not seem appropriate to compare the two numbers without any explanation of the gradual phase-in of the NCC.

2) In a similar vein, we do not believe the report overall gives sufficient context to its findings and recommendations, which are based on information obtained in the fall and early winter of 2005, when the first operational year of the NCC pilot was in mid-development. The report’s findings reflect only the first 6 to 9 months of NCC pilot operations, and it should be revised to clearly state that, and to take into account the Commission’s planned phase-in of the NCC operations. As currently written, the report criticizes the NCC for failing to meet the expectations of a fully operational call center, but, to our knowledge, the Commission did not intend the NCC to be fully operational in the first 6 to 9 months of the pilot.

The attorney assigned to this matter is Kathleen Oram, who may be reached at extension 4681.

OLC:AELD:KORAM:4/20/06

April 24, 2006

MEMORANDUM

TO : Aletha L. Brown
Inspector General

FROM : Spencer H. Lewis, Jr., Director
New York District Office

SUBJECT : Comments of Draft NCC Report

Thank you for the opportunity to comment on the draft report on "The EEOC's National Contact Center: An Evaluation of its Impact."

Given that the NCC was established to upgrade customer service, improve human capital effectiveness and deliver accurate and consistent service to its customers, our comments will focus on those three areas.

Upgrading Customer Service:

That the NCC provides a live person to all EEOC callers is definitely an improvement in our customer service for people initially trying to reach the EEOC. The NCC was rated above average compared to other Federal call centers, and to service industries in the private sector. For better or worse, it is becoming less and less a standard of customer service to get a "live person" on the telephone promptly when one calls a large organization or institution, not to mention that we can take calls in multiple languages. Thus, in our opinion, the objective of "upgrading customer service" has been successful.

Improve Human Capital Effectiveness:

Assessing Impact: First, it is difficult to assess the overall impact of the NCC on staff for a couple of reasons. First, with no baseline data on number of calls, volume of email and volume of snail mail the district and field offices received prior to the inception of the NCC, there is no objective data on the impact of the NCC on the field's workload.

Having said that, the concept of NCC as a vehicle to improve customer service was premised in part on the fact that the district/field offices were unable to handle all the calls they received - literally, many calls went unanswered, or, our response was so delayed that the caller made a second call to us. The NCC has taken up the slack on the unanswered calls -- but since those calls were not taking up field resources to begin with, because they were beyond our capacity, NCC's picking them up does not significantly free up labor resources to do other things or reduce assigned workloads.⁵⁰ However, were it not for the NCC, the thousands of calls they resolve would most likely continue to go unreturned by the filed.

⁵⁰ In our office, we have redirected some resources from answering phones to receiving and assigning questionnaires that come from the NCC.

In addition, given the statistics on the number of calls being answered by the NCC, and the fraction of that being forwarded to the field, I think it is safe to say that field offices are generally getting fewer calls -- however, the decrease is not felt as much by those offices who have continued to lose staff and are distributing the calls they still receive among fewer people.

Meeting Staff Expectations on the Value of the NCC: The report points out that while staff did/do understand the purpose of the NCC, their expectations about the value of NCC have not been met. I think this is key to the report. In our opinion, the NCC is doing what it was asked to do - and in that sense, it is not accurate to say the NCC has failed to deliver. However, because of the ever-decreasing body-count in district/field staffing and the corresponding increases in workload on those who remain, establishing the NCC created an unrealized hope that it might relieve some of the intake pressure.

We are also generally satisfied that the NCC is doing what it was instructed to do vis-a-vis the questionnaires. But, for example, in New York City, despite the help from NCC, we still receive 100- 115 pieces of direct mail inquiries a week, 45-50 emails/EAS questionnaires from NCC, 60 - 80 messages a week on our own Intake phone line, and an untracked number of calls on our general phone line. One hundred percent of these inquires require intake follow-up before a charge is filed. If each intake contact and the associated IMS data entry averages 45 minutes (some shorter, some longer), our 18 investigators would conservatively spend one-fourth of their time on intake, and in fact, we estimate it over 30%. Thus, the negative assessment of the NCC impact seems to be more a ventilation of frustration that the NCC cannot do more, which is not the same as saying it has not accomplished its intended mission.

Deliver Accurate and Consistent Service to Customers:

The high rating by customers of the NCC suggests that overall, customers are getting consistent and correct information from the NCC. As that was one of the aims of the NCC, the NCC has achieved this objective and that's a plus for the EEOC.

Conclusion/Recommendations:

We believe that the improved customer service being provided by the NCC is a good start and the concept should be built upon, not scrapped, at this point. Some of the functions we would especially like to see studied for possible take-over by the NCC are:

- ◆ the disclosure process under FOIA and Section 83
- ◆ mailing of comprehensive intake questionnaires for all field offices - to eliminate need to mail second questionnaire to PCPs after receiving the EAS from the NCC.

cc: Nicholas Inzeo, Director, Office of Field Programs
Cynthia Pierre, Director, Field Management Programs
John Schmelzer, Acting Director, Field Coordination Programs
Ed Elkins, Project Manager, National Contact Center

April 21, 2006

MEMORANDUM

TO: Aletha L. Brown
Inspector General

FROM: Katharine W. Kores
District Director

RE: NCC Evaluation Draft Report Comments

I appreciate the opportunity to comment on the NCC Evaluation Draft Report.

My first concern regarding the NCC Evaluation Draft Report is its failure to include the disclosure of possible conflicts of interest involving the main sub-contractor, Convergys. The report does not indicate whether the Inspector General, or the contractor, Job Performance Systems, Inc. were aware of the fact that Convergys was an unsuccessful competitor for the EEOC NCC contract. Since Convergys “took the lead in evaluating the operation of the NCC,”⁵¹ the report should include an explanation of the action taken by Convergys to enable it to approach this project from the position of an unbiased evaluator and not a business competitor of NCS Pearson Inc. There is also no indication in the report that either the IG or JPS knew that the EEOC had filed an enforcement action against Convergys alleging that it violated the Americans with Disabilities Act. Again, the report should include an explanation why this ongoing litigation and adversarial relationship⁵² do not create a conflict preventing Convergys from performing an unbiased review of the EEOC NCC.

My second concern is that the recommendations in the report do not seem to logically flow from the findings of the report and my understanding of the purpose of the EEOC NCC. My understanding of the major purpose of the NCC was to increase the EEOC’s ability to provide reliable customer service to unsolicited callers. Many of the findings in the report indicate that the goal of providing better customer service is being achieved. For instance, the objective finding that callers are able to speak to a live person from 8:00 a.m. to 8:00 p.m. and that over 100 languages can be accommodated is an obvious expansion on the EEOC’s ability to serve the public prior to the NCC pilot. There is also the finding that staff believes the NCC is picking up calls that had previously been dropped because of technology issues. The Customer Satisfaction Index rates the NCC above average compared with other Federal agencies and private sector service industries. Given these and other indications throughout the draft report that enhanced customer service is being provided, the recommendation that the NCC pilot be scrapped is not reasonable or helpful.

The recommendation to scrap the NCC pilot seems to stem mainly from the report’s finding that the number of calls handled by the NCC is lower than was projected prior to

⁵¹ Draft Report, page 4, footnote 2.

⁵² On Friday, April 14, 2006, a federal jury returned a verdict finding Convergys violated the ADA and liable for over \$114,000 in back pay and damages.

the commencement of NCC operation. However, there are other findings in the report which indicate that this number of calls can reasonably be expected to increase. The low number is likely influenced by the very early stage at which the NCC operation was being reviewed. The NCC had been in operation less than six months when the review period began and less than one year when the review period ended. The report finds that there is a need for increased awareness of the toll free 800 number and that during the review period many of the EEOC field offices had not yet put a message on their voice mail redirecting callers to the NCC. It also finds in June 2006, the Commission will launch a major advertising campaign to increase awareness of the 800 number.

The findings made in the report which relate to the NCC's ability or failure to take charges, categorize charges, counsel callers or have a complete knowledge of the laws against employment discrimination imply that a different function was intended for the NCC than that of a Contact Center. The functions listed are properly reserved to EEOC personnel. It was not and should not be, in my opinion, the Commission's goal to have the NCC perform these important EEOC responsibilities. The NCC was never intended to replace the EEOC. The purpose was and should be, to provide a reliable means by which members of the public can contact the EEOC and obtain accurate, basic information regarding the EEOC and the laws against employment discrimination. I find most helpful the recommendations which involve training for CSRs, additions to FAQs and scripts, coordination of technology and improved and expanded record-keeping. It is unfortunate that the draft report takes such a negative tone rather than focusing more constructively on these opportunities for improved service by the NCC.

cc: Chair Cari M. Dominguez
Commissioners
Lea Guarraia, COO
Headquarters Directors
District Directors
Nick Inzeo, Director OFP
Ed Elkins, Senior Advisor to the Chair
Cynthia Pierre, Director FMP

Charlotte District Office

From: MILTON MAYO [MILTON.MAYO@EEOC.GOV]
Sent: Wednesday, April 12, 2006 5:54 PM
To: REUBEN DANIELS
Cc: EDISON ELKINS
Subject: Re: Fwd: Total Taste of Technology at Call Center Demo
&Conference Orlando

Importance: High

** High Priority **

Hi Ruben,

Thanks for your insightful comments and the referral to callcenterdemo.com. I will ensure that your comments and referral are circulated among the team. We appreciate your thoughtfulness and continued commitment to improving the process.

Milt

>>> REUBEN DANIELS 4/12/2006 2:19:15 PM >>>

As I've been studying the draft report and opened this, I immediately thought of you and the potential this may help us devise improvements to the NCC. As a proponent and supporter of increased use of call center technology, this program seems to provide some insight to several key issues raised in the report that need to a part of the decision of how we get better benefit from the program going forward.

It always struck me that the failure to integrate the NCC with IMS was fraught with potential for problems and lost efficiency. That is why the section on integration with in house systems caught my eye. However, going back to pre-NCC status strikes me as the worst possible solution.

>>> keithdawson@updates.cmp.com 4/12/2006 2:01:17 PM >>>

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AFL/CIO

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April 20, 2006

Larkin Jennings
EEOC
Office of Inspector General
1801 L Street, NW
Washington, DC 20507

Re: Draft Call Center report

Dear Mr. Jennings:

Thank you for the opportunity to provide comments on the Draft Report on the Draft National Call Center (call center). There are a number of findings with which I agree. In addition, there are a few concerns I wish to express about areas where the report could use additional focus.

Initially, I must say that the report is comprehensive, addressing the background behind the move to establishing the call center, the various modes in which it has operated and the reasons it is failing. Unfortunately, EEOC implemented the call center despite strong predictions of these outcomes.

The Report Findings

I agree with the findings that the call center has little, if any positive impact on the work of the EEOC offices. Moreover, I agree that the call center is neither cost effective, nor is it providing any relief to offices. The call center results in way too much duplication of work for offices, the number of calls to an office have not declined, and the amount of work has stayed the same. Further, the work quality is highly inaccurate, creating in many cases, more work than had the call initially come directly to an EEOC office. Seven days of training would not provide enough understanding of EEOC's laws, processes and procedures to allow staff to provide the necessary service to the public. The EEOC should never have undertaken to reduce civil rights enforcement to key words and scripts and I think that the report needs to address the inability to reduce substantive rights to the ability of someone to find the correct key word in six minutes or less. Continuing the call center will result, at best, in paying for an extremely expensive message service.

EEOC cannot fix any of these outcomes by continuing to throw money at the problems. So, I do not agree with the recommendations to fix the call center. Frontloading its resources into answering the phones through the call center and getting no other reasonable value for the money, as can occur if the employees are working in EEOC's offices hinders the remainder of the investigative process. Further, it is unreasonable to require that a case receive priority handling because someone used the call center. Offices must address all customer inquiries. EEOC can fix its customer service problems, however, by returning customer service to the local offices.

A Missing Option:

Hiring Investigative Support Assistants (ISAs) in various offices throughout the country to serve the intake customer service functions should receive more direct and specific focus in the report. Originally developed to assist Investigators in the intake and investigative processes, ISAs counsel members of the public, screen potential charges, and handle mail inquiries. ISAs also provide additional clerical support to offices. Since the ISA position also served to provide a cadre of employees who could be promoted into Investigator vacancies, EEOC was able to capitalize on the training and resources invested in these employees, as well as on the expertise gained by the ISAs. However, EEOC cannot recoup the expense of training and resources expended on revolving door call center staff who always will have only limited expertise.

Other Areas the Final Report Should Address:

1. The final report should highlight the extreme cost of continuing to do business in the same way. As structured under the current contract, the mission of call center employees is to get off the phone as quickly as possible – inaccurate information and passing the call along had been predicted. As the report indicates, most of the training is geared toward that result.
2. The final report should mention that expending any resources to train employees at a call center with a high rate of turnover would be a huge waste of money and would sap resources. Given the almost unanimous survey results that call for more investigative and support staff to handle calls, mail and investigations in offices, the report should reflect that diverting additional funds to train the telemarketers would be irresponsible and a tremendous waste of precious resources. Finally, the final report must note that training call center employees never will provide them with a stake in the agency's mission since they remain so far removed from the investigations.
3. The final report should not recommend that the call center take on any additional functions. Several studies of call centers in the federal government question the value of diverting resources to call centers when, as here, the public cannot directly contact the agency's offices and when poor quality service and inaccurate information is being given out. A more recent GAO study questions the value of such centers when quality control mechanisms are insufficient. Again, the draft report study does not mention those studies or make specific recommendations. However, despite the wisdom of those studies, ignored when the call center was implemented, I repeat my concern that additional money not be thrown at the call center to fix the EEOC's debacle.
4. Any recommendation that EEOC send more work to the call center must mention EEOC's promise to keep its offices accessible to the "unsolicited" public. From EEOC's first

mention of instituting a call center, the public was concerned that EEOC would close its doors to members of the public seeking to speak with an employee about claims of discrimination. The EEOC indicated several times that it would not prevent the public from directly going into an office or contacting an office. So any recommendation to direct all unsolicited calls to a call center violates EEOC's commitment to retain open access. Moreover, as the draft report found, the call center adds a layer of bureaucracy that victims of discrimination must endure. Why would we continue to push this layer of bureaucracy?

5. Since EEOC makes much of the fact that the initial contacts with the public are part of the investigation, the report must acknowledge that EEOC would be sending work it has deemed "inherently governmental" to the call center. EEOC would be required to comply with all regulations concerning contracting out, should it continue the call center debacle. The final report should note that any recommendation to sever unsolicited ties with a government office, the purpose of which is to serve the public, would violate the public trust.

6. The final report must further highlight the small number of calls handled by the call center, at an exorbitant cost. The cost benefit analysis would weigh against continuing the call center.

7. The final report must change the negative connotation of Pre-NCC activities. To the extent that the Draft Report suggests that having experienced EEOC employees handle the calls and work directly with the public is a bad thing, this must be changed. That premise is faulty for several reasons. First, unlike with the call center, callers were not bounced from a live body to another office. Callers either spoke to someone, or left a message. Next, comments about the merits of the case were not being made, nor could they be misconstrued due to the number of people involved in the call center process. Next, more attention must be given to the faulty underlying data.

The report should specifically mention that EEOC's method of attempting to obtain baseline data was seriously flawed in several respects. EEOC cannot determine what it asked to come up with the information, but its directions were flawed, and there was no mechanism to determine how offices interpreted the instructions. So the negative connotation is not deserved. The recommendation in the final report should be to increase staff to address the ability to provide a level of service in each EEOC office.

8. The final report should address more specifically, the cost factor for technologies involved in attempting to obtain accurate data through the call center. As the draft report notes, continuing to pursue the call center will require substantial commitments of money. Although the draft report notes that the current technologies available at the call center are not being used effectively, it does not address or identify potential downsides to throwing more money at the problem. The final report should acknowledge that sinking more money into these technologies prevents EEOC from putting resources into technology available for its employees. EEOC's employees are required to conduct complex investigations, yet the funds spent on the call center limit EEOC's abilities to improve its extremely limited technologies to assist with the work. All EEOC's employees are impacted by the severe lack of technology to perform their work. For example, while EEOC has computers that are used when speaking with members of the public, it has not invested in improving its current technologies to allow it to capture much of the information it pays the call center to capture.

9. As for impact on customers, the draft report accurately notes that the impact statements are meaningless given the lack of front end data. The final report could highlight that despite questions being asked early on about the accuracy of its premises, EEOC never sought to obtain an accurate record in this regard.

10. One final comment about the call center - the Agency's efforts to influence the outcome should be more prominent. The agency was aware of when the survey would be released and shamelessly attempted to influence the results. This should not be relegated to a passing remark.

Please feel free to contact me should you need to discuss any of the matters herein.

Sincerely,

Gabrielle Martin, President

Appendix B. Key Documents Reviewed

National Contact Center documents

- *EEOC Contact Center Customer Satisfaction Survey*, CFI Group, May, 2006
- *Equal Employment Opportunity Commission: Organizing for the Future*, National Academy of Public Administration, February 2003
- *Assessment of a National Contact Center Solution for EEOC*, EEOC National Contact Center Work Group, June 2003
- Commission Meeting Transcript – September 8, 2003
- Contract dated September 20, 2004 between the US Equal Employment Opportunity Commission and NCS Pearson, Inc., and contract modification dated September 28, 2005 and effective May 1, 2005

EEOC Operations documents

- ORIP Study of High Performing Investigator
- Investigator competencies, and position descriptions for Investigator, supervisory Investigator, Investigator support assistant
- EEOC Performance Budget
- *New Investigator Training FY 2005*

Field Repositioning documents

- *EEOC Field Repositioning Plan* dated July 6, 2005
- Questions and Answers on Proposed Field Repositioning Plan
- Forum on Field Repositioning – transcript dated June 23, 2005
- *Equal Employment Opportunity Commission: Actions Taken, but Agency Restructuring Efforts Could Benefit from a More Systematic Consideration of Advisory Panel's Recommendation*, U. S. Government Accountability Office, October 2005. GAO-06-10

Other

- *President's Management Agenda*, Executive Office of the President, Office of Management and Budget, 2002
- *Federal Contact Centers: Mechanism for Sharing Metrics and Oversight Practices along with Improved Data Needed*, U. S. Government Accountability Office, February 2006. GAO-06-270

Appendix C. Headquarters Interview Protocol



Interview Protocol

Name & Title	
Contact Information	
Location	
Time in Present Position	
JPS/Convergys Participants	
Interview Date	
Notes prepared by	

GENERAL

What are your Job Responsibilities?

What has been your involvement with the NCC?

NATIONAL CONTACT CENTER

What is your impression of the effectiveness of the NCC?

What impact would you expect the NCC would have on:

The efficiency and effectiveness of EEOC operations?

EEOC customers (access, timeliness, quality of service) for those who contact NCC and those who contact field offices initially?

EEOC field and HQ staff?

- What jobs in the field are impacted
 - District, Field, Area, local offices
 - Will the jobs impacted by the NCC also be impacted by the repositioning?
- Will the NCC impact people in the 4 types of offices differentially?
- Jobs impacted in HQ?
- Part of our plan is to conduct a workshop with people in jobs impacted by the NCC to learn before/after impact and then conduct a survey to identify significant changes. What criteria would you use in selecting the offices for these workshops?

If the EEOC were to decide to shut down NCC next month, what would be the impact?

ASSESSMENT CENTER REPORT

Are you familiar with this report and what did you think of it?

We are considering replicating this work in 5-6 offices.

Do you think this would be valuable?

What criteria would you recommend in identifying the offices we use to replicate the work?

REPOSITIONING

Will the new district, field, area and local offices function the same as before the repositioning?

STAKEHOLDERS

The EEOC has many stakeholders (show list attached). Are any external stakeholders important to contact for this study?

METRICS

What measures presently used would be useful in this investigation

HQ (DC local office, HQ activities such as complaints)

District, field, area and local offices

EEOC Stakeholders

Some that were included in the September 2003 repositioning meeting included:

Internal

Union

Regional Attorneys

District Directors

IG

Acting Director, OFP

Ed Elkins

OIT

OFP (Cynthia Pierre)

External

Equal Employment Advisory Council

International Association of Official Human Rights Agencies

Leadership Conference on Civil Rights (there was June 22, 2005 communication between Chair and the LCCR)

NAPA

National Employment Lawyers Association

OPM

Partnership for Public Service

Society for Human Resource Management

June, 2005 repositioning meeting

NAACP Federal Sector Task Force

AFL-CIO

AFGE

National Council of EEOC Locals

Communication Workers of America

FEPA partners

Appendix D. Methodology Details

Field Site Visits

JPS personnel visited the five district offices and one area office (both JPS and Convergys personnel visited one district office). Convergys personnel visited an area office. The team spent from one to one and a half days at each field site, with a goal of meeting with most of the staff in the seven offices; however, not all employees were available in all offices. The team generally interviewed the Office Director and/or Enforcement Manager and, in the district offices, the Regional Attorney and Program Analyst. The team also conducted several focus groups. One was with the Charge Receipt/Technical Information Unit Supervisor, Office Automation Assistants (OAAs), Investigator Support Assistants (ISAs), Receptionist(s), and Secretary(ies) (in offices where these jobs existed). The team also conducted a focus group with Investigators, and, when available, a focus group with Attorneys. The team also observed the processes followed when offices handle communication from the NCC.

The JPS Team prepared an agenda and interview protocol for each field site visited. The team asked employees to describe their role in the office and their perceptions of the NCC's impact on their work and their office. When meeting with management personnel, the team inquired about their expectations and experiences with the NCC.

The team asked support personnel (ISAs, OAAs, Receptionists, and Secretaries) how the NCC has affected their work, particularly in how they perform intake processes, support the taking of charges, and handle telephone calls. When meeting with Investigators, the team asked about the intake process and their experiences and thoughts on the NCC's impact. The team also asked Investigators to identify their current tasks and whether their jobs have changed since NCC implementation. The team asked their supervisors questions to help confirm information provided by the Investigators.

Surveys

Office Director Survey. The team sent this survey to all Office Directors at each of the EEOC's 51 offices. Where there was no Office Director, the survey was provided to the acting Office Director, the Enforcement Manager, or the District Director. JPS sent the survey in the form of a Microsoft Word document as an email attachment. Depending upon the extensiveness of the responses, the team followed up with some directors and requested additional information.

Prior to sending the survey, the team obtained a review of the items from OFP, OIG, and an Enforcement Manager in the field. The final survey contained ten questions. The items were ones that needed an answer from just one person in the respective offices; thus, sending this survey reduced the need to ask these same questions of everyone in the other survey.

The questions asked were:

- What trend data the Office Directors would like to receive
- Whether the toll free 800 number is listed in the local telephone book
- How many hot line calls were received and whether they were within the 30 day time period prior to expiration of the SOL

- The frequency with which office intake questionnaires are sent out after receiving EASQs from the NCC
- Intake procedures for walk-in and telephone customers
- What they did as a result of working with the NCC that might be considered a best-practice for the other offices to follow
- Some recommendations related to the NCC

There were also a few questions asking about the intake process that the office follows and when the office records the EASQ into the EEOC's IMS.

The team initially asked for a response within one week. When the team did not receive requested information or did not understand the responses, it followed up by email and/or telephone calls to the directors. The team received a 100% response rate. The survey is attached as Appendix E.

Electronic Survey. The JPS Team drafted an electronic survey to learn the experience and opinions of staff in the field relative to the NCC. Each survey item was reviewed by staff in OFP, the OIG, and a representative of the Union. To ensure that the survey would perform as expected, the team then sent it to five incumbents in one field office. The final survey was then sent to all employees located in the EEOC field offices.

The survey contained 27 items; most were multiple-choice questions. Sixteen of the multiple-choice questions asked the respondents the extent to which they experienced certain phenomena related to the NCC. Responses to these questions were provided on a seven-point scale (none, 1-20%, 21-40%, 41-60%, 61-80%, 81-100% and N/A).

The survey was comprised of four sections: (1) telephone calls pre/post-NCC, (2) accuracy and completeness of EASQs received from the NCC, (3) GroupWise emails from the NCC, and (4) the role of the NCC. There was a filtering question for each of the first three sections to ensure that respondents without relevant experience would skip those sections. Everyone was asked questions about the NCC's initial and possible future role. There was also one question at the end of the survey where respondents were given the opportunity to provide additional comments regarding areas covered by the survey or other NCC-related issues.

The survey was made available to all employees in the field from February 9 through February 23, 2006. It was launched by an email from Aletha Brown, Inspector General, describing the nature of the survey and employee participation. Within a few minutes after that email was sent, JPS sent an email with a link to the survey. Two follow-up emails were sent – one seven days after launch and the second the day before the survey was closed. The reminder email from the Inspector General thanked employees who took the survey and encouraged non-respondents to participate, and the JPS reminder email was sent only to non-respondents. [

Separate from the team's survey, the EEOC sent three emails about the NCC to all employees during the time the survey was being administered. The first email (a few hours before the survey was launched) reported that a link to the NCC's FAQs was posted under "What's New" on the EEOC's internal website. The day after the survey's launch, the EEOC sent a National Contact Center Newsletter to all employees. One week after the survey's launch (and coincident with the first reminder emails) the EEOC sent a report describing NCC activities for the month of January. The team was advised that this was the first time information on NCC operations

was circulated to all employees in the field. It is possible that sending this information while the survey was in the field could have been perceived as an effort to influence survey responses and therefore negatively influenced response rate and/or survey responses.

The survey was sent to 1,798 employees located in the field. Forty-one employees did not receive the survey, thirty-two of whom were in the New Orleans office, which did not have Internet connectivity while the survey was in the field. One survey was undeliverable and the remaining eight employees were out of the office the entire time the survey was in the field; therefore, 1,757 employees received the survey. Of this total, 935 individuals responded, yielding a response rate of 53.2 percent. Nineteen people completed only the first two questions. As both questions were just filter questions, there was no value in including these surveys in the data analyses.

The employees in the final sample were diverse in terms of tenure. Of those taking the survey, 17 percent have been employed by the EEOC for 5 years, 20 percent for 6-10 years, 16 percent for 11-15 years, 17 percent for 16-20 years, and 30 percent for more than 20 years.

A response rate of 53.2 percent is good. While the survey provides an indication of what the respondents believed at the time they took the survey, the results are not generalizable to everyone in the field because the characteristics of the respondents differ from the population, as indicated by different response rates across offices and job types. For example, the response rates by office (excluding the New Orleans office) and office type ranged from 48 percent to 60 percent. Table 36 provides information on the response rate as a function of the type of work performed. The range in rates was from a low of 30.6 percent of administrative staff to a high of 61.5 percent of State and Local. If all variables in the survey sample and field populations had been the same (e.g., across office type, work, and other variables), then we could have generalized results to the population. This usually occurs when the response rate is very close to 100 percent.

Table 40. Survey Response Rate by Work Performed

Type of Work Performed	Percent Response Rate
Admin	30.6
Clerical	46.2
District Director	60.0
Investigation	57.7
IT	59.6
Legal	38.3
Legal- Federal	38.8
Mediation	47.9
OA (Enforcement or Legal)	59.1
OA (Enforcement)	44.7
Outreach	60.9
State and Local	61.5
Support Staff - Federal	50.0
Support Staff - Individual	63.6
Support Staff - Investigation	47.8
Support Staff - Legal	50.0

Appendix E. Field Office Director Survey



Questions for EEOC Offices

Following are a few questions for office directors and/or specific people in your field offices. Please consolidate responses from your office and **return this questionnaire** by close of business **Monday, February 13, 2006** either by email lwadsworth@jps-usa.com or by fax 703/683-5825.

If you have any questions, feel free to contact Lee Ann Wadsworth at 703/683-5805 ext 208 (office) or 703/851-5431 (cell).

Office Location	
Office type (DO,FO, AO, LO)	
Contact Name	
Telephone Number	

Trend data desired

1. Please indicate what trend data you would like to receive from the National Contact Center (NCC) and the frequency. (Please add rows in the table below if needed by placing the cursor in the bottom right cell and pressing the tab key).

Trend Data Desired	Frequency

Telephone listing

2. Please have someone in your office check the blue pages of the telephone directories you have in your office and record for each directory whether the EEOC's 1/800 number (NCC) is listed. (Please add rows if needed by placing the cursor in the bottom right cell and pressing the tab key).

City	Date Published	800 number listed (yes/no)

“Hot call” transfers from the NCC (Potential Charging Party is transferred directly from the NCC because there is a risk of Statute of Limitation expiring)

Please ask the person who handles the intake for the “hot calls” to answer the following two questions:

3. Approximate total number of “hot calls” received from the NCC	_____
4. Approximate percent of these calls that are within 30 days of the Statute of Limitations expiring	_____ %

Your office intake questionnaire

5. Of the total EAS forms your office receives from the NCC, what percent of the time does your office send out an intake questionnaire?	_____ %
6. Please ask the relevant person(s) in your office who oversees sending out intake questionnaires if it would benefit your office to have the National Contact Center send out your office intake questionnaire with a return envelope addressed to your office.	<p style="text-align: center;">Yes</p> <p style="text-align: center;">No</p>

a. If yes, please indicate the labor savings to your office in an <u>average month</u> . (Please add rows if needed by placing the cursor in the bottom right cell and pressing the tab key).			
	Pay Grade	Number of People	Approximate Hours per Month

Office Intake Procedures

7. When a new Potential Charging Party (PCP) **walks in your office** to inquire about filing a charge and the Statute of Limitations will not expire within 30 days, please indicate your office procedures (mark all that apply by placing “XX” next to the letter):

a.	Provide screening by an ISA while the PCP is still in your office
b.	Give the PCP an intake questionnaire to complete
c.	Make an appointment for some future date
d.	Provide screening by an investigator while the PCP is still in your office
e.	Other (please explain)

8. When a new Potential Charging Party (PCP) **calls your office for the first time** to inquire about filing a charge, please indicate your office procedures (mark all that apply by placing “XX” next to the letter):

a.	Transfer the call to an ISA to provide screening
b.	Send the PCP an intake questionnaire
c.	Make an appointment
d.	Transfer the call to an investigator to provide screening
e.	Other (please explain)

Best Practices

9. Does your office have any current best practices to effectively and efficiently utilize resources/capabilities provided by the NCC that you would like to share with other offices? If yes, please explain.

Recommendations to Effectively Utilize the NCC

10. Do you have recommendations to more effectively and efficiently utilize resources/capabilities provided by the NCC? If yes, please explain.

Appendix F. Electronic Survey to All Field Staff

Survey Results (Included Responses)



EEOC Field Survey Final I

Report created on: Wednesday, June 21, 2006 5:44:00 PM

The results of your survey are displayed below. If your survey includes text responses, click the "View" button to read individual results. To exclude a particular response, click the Included Responses button. You can then view the set of individual responses that are currently included and select those you wish to exclude. Results below contain only included responses

EXCLUDE BLANK RESPONSES

Launch Date	02/09/2006 - 12:38 PM
Modified Date	02/24/2006 - 8:27 AM
Close Date	06/15/2006 - 10:48 AM
Email Invites	1809
Visits	977 (54%)
Partials	57 (3%)
Completes	894 (49%)

Go to Individual Complete Responses:

Show respondent's emails.

INCLUDED RESPONSES

EXCLUDED RESPONSES

Included Respondents: 894

Excluded Respondents: 0

- [Cross Tabulate](#)
Cross reference multiple questions
- [Download Results](#)
Receive results in spreadsheet format
- [View Recipient Status](#)
Check the response status of each of your recipients

Responses: Completes only Partials only Completes & Partials

Welcome

Dear EEOC Employee:

As you know, the EEOC's Office of Inspector General retained Job Performance Systems (JPS) to perform an independent evaluation of the National Contact Center (NCC). This will provide us information on how the NCC has affected the EEOC and its customers. This survey is a **critical** part of the review.

Confidentiality

While your participation is completely voluntary, we encourage you to take a few moments to complete the survey. Your responses will go to an external website that is accessible only by JPS. JPS will aggregate and analyze the data, and the data will be reported in summary form only. Therefore, **your answers** will be kept completely **confidential** and no one within the EEOC will be able to link your name with your responses.

Survey Instructions

Please keep the following in mind when you take the survey.

- The length of the survey depends upon your role. Some people will finish within 2-3 minutes, while others may take up to approximately 10 minutes to complete.
- You can stop and restart at another time if you are interrupted while filling out the survey.
- When you click on the "Submit" button at the bottom of each page your answers will be submitted to a secure website. You will not be able to re-run to that page to change your answers.

To start the survey, click "Submit." Thank you for your participation!

Telephone Contact

In the past 12 months, what has been your experience with telephone contact from the public i.e., unsolicited calls

1. generated from your office's main or public telephone number:

	Number of Responses	Response Ratio
None	133	15%
Answer calls only	47	5%
Return calls only	105	12%
Answer and return calls	561	63%
VIEW Other (please specify)	48	5%
Total	894	100%

Telephone Calls Post Implementing the NCC

In an average week over the past 3 months, **approximately** how many unsolicited calls 2. have you answered? (Enter number, e.g. 2, 35)

[VIEW](#) 602 Responses

PROGRESS: 3% Complete

Telephone Calls Post Implementing the NCC, continued

Thinking about that same average week over the past 3 months, **rank order** the types 3. of unsolicited calls you have answered (1=most frequent calls, 7=least frequent calls):

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1	2	3	4	5	6	7
1. Non-jurisdictional calls (including calls for other agencies)	7%	13%	19%	18%	17%	10%	16%
	26	52	75	73	68	41	63
	38%	22%	17%	8%	4%	5%	4%

2. Case status	180	105	80	39	20	25	19
3. Requests for information on filing a charge (including calling to file a charge)	33%	26%	18%	7%	7%	4%	4%
	164	129	88	37	35	20	22
4. Requests for general information (office hours, location)	7%	10%	20%	20%	19%	13%	10%
	32	44	84	87	82	56	44
5. Requests for information on outreach activities (seminars, training)	6%	5%	6%	12%	17%	26%	27%
	25	21	23	49	67	104	108
6. Requests for materials/publications	5%	5%	7%	12%	17%	26%	28%
	23	26	33	56	82	126	133
7. Customer complaints	9%	12%	12%	14%	14%	15%	24%
	51	68	64	77	78	80	130

Before continuing to the next question, please make sure that a selection has been made for each of the seven items in question 3 above.

In that same average week, approximately what percent of unsolicited calls were from people who say the NCC told them 4. to contact your field office directly?

	Number of Responses	Response Ratio
None	208	35%
1-20%	171	29%
21-40%	69	12%
41-60%	35	6%
61-80%	44	7%
81/100%	24	4%
N/A	46	8%
Total	597	100%

PROGRESS: 17% Complete

Telephone Calls Last Year (pre NCC)

In an average week during **approximately** the same 3 month timeframe last year (pre NCC), approximately how many unsolicited calls did you answer ? (Enter number, e.g. 5.15, 86)

[VIEW](#) 589 Responses

PROGRESS: 19% Complete

Telephone Calls Last Year (pre NCC), continued

Thinking about that same average week last year (pre NCC), **rank order** the types of **6. unsolicited calls you have answered (1=most frequent calls, 7=least frequent calls):**

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option



	1	2	3	4	5	6	7
1. Non-jurisdictional calls (including calls for other agencies)	8% 30	12% 48	23% 92	17% 67	12% 49	11% 45	16% 64
2. Case status	40% 176	26% 113	13% 58	9% 38	5% 21	4% 19	4% 18
3. Requests for information on filing a charge (including calling to file a charge)	32% 144	26% 119	17% 78	7% 32	7% 33	6% 28	5% 23
4. Requests for general information (office hours, location)	4% 18	12% 50	18% 74	28% 119	18% 77	12% 49	8% 35
5. Requests for information on outreach activities (seminars, training)	5% 22	5% 22	7% 29	11% 46	15% 62	26% 106	30% 122
6. Requests for materials/publications	4% 20	5% 23	9% 41	11% 53	20% 94	27% 125	23% 105
7. Customer complaints	10% 51	13% 66	10% 55	14% 76	16% 82	15% 77	22% 118

PROGRESS: 31% Complete

Before submitting this page, please make sure that a selection has been made for each of the seven items in **question 6 above**.

Field Office Position

Are you an Office Director, Enforcement Manager, Enforcement 7. Supervisor, Investigator, ISA, OAA, or Stay in School Student?

	Number of Responses	Response Ratio
Yes 	574	64%
No 	320	36%
Total	894	100%

PROGRESS: 32% Complete

Intake

8. Are you involved in intake?

	Number of Responses	Response Ratio
Yes 	493	86%
No 	81	14%
Total	574	100%

PROGRESS: 34% Complete

EEOC Assessment (EAS) Forms

9. What information on the EAS do you use? (Check all that apply)

	Number of Responses	Response Ratio
User Information (name, address, phone)	357	73%
Employer Information (name, address, phone, number of people)	279	57%
Complaint Information (Description of Action Against Person and why discriminatory)	299	61%
I never use the EAS forms	119	24%

PROGRESS: 36% Complete

EEOC Assessment (EAS) Forms, continued

What additional information on the EAS form would be beneficial for you to have before contacting potential charging parties? (Check all that apply)

	Number of Responses	Response Ratio
Language requirements if not English	242	54%
Date of most recent incident of discrimination	344	77%
Convenient time to contact the customer	253	56%
Number of employees	318	71%
More details regarding what happened to the customer and why they believe it to be discriminatory	301	67%
Who the customer is using for comparison	275	61%
Specific behavior/conduct prompting the complaint	261	58%
If the basis for discrimination is race, then provide the person's race	317	71%
If the basis for discrimination is age, then provide the DOB	327	73%
If the basis for discrimination is disability, then provide the disability	315	70%
If the basis for discrimination is retaliation, ask on what basis they were retaliated against	325	72%
VIEW Other (please specify)	121	27%

PROGRESS: 37% Complete

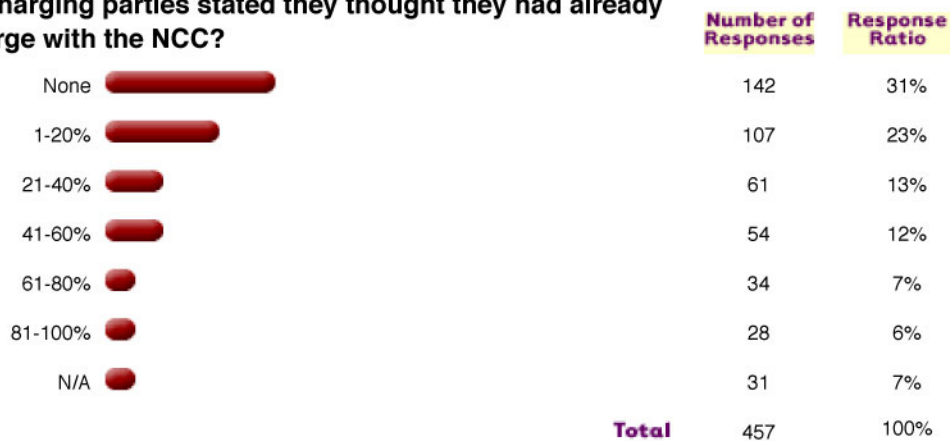
EEOC Assessment (EAS) Forms, continued

Of the EAS forms you reviewed in the past 3 months, approximately what percent 11. were:

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1 None	2 1-20%	3 21-40%	4 41-60%	5 61-80%	6 81-100%	7 N/A
1. Not job related	38% 164	31% 131	8% 36	3% 15	3% 12	4% 16	13% 55
2. For Federal complaints	55% 229	22% 93	1% 6	1% 6	1% 3	1% 6	17% 71
3. Not national origin, race, sex/gender/pregnancy, religion, age, color, disability or retaliation	24% 103	32% 134	13% 53	7% 30	7% 31	7% 30	10% 40
4. In companies with 14 or fewer employees	37% 153	36% 149	8% 33	3% 12	1% 3	2% 9	13% 53
5. For age only and in companies with 19 or fewer employees	52% 216	22% 91	4% 17	3% 11	0% 2	1% 6	17% 70
6. Not in the lapse date plus 30 day time period	45% 181	19% 75	6% 24	3% 12	2% 10	1% 6	23% 93
7. Age only and less than 40 years old	54% 220	23% 94	4% 17	3% 12	1% 5	2% 7	13% 52
8. For a person who already had an inquiry in the IMS	23% 94	30% 125	17% 68	9% 38	6% 23	3% 13	12% 49

Over the past 3 months, approximately what percent of the potential charging parties stated they thought they had already 12. filed a charge with the NCC?



PROGRESS: 53% Complete

EAS Completeness/Accuracy - User Information

The following questions ask first whether information that you review on the EAS is complete, and then whether it is accurate.

Approximate percent of EAS forms I reviewed in the past 3 months where the User 13. Information was not complete:

	1 None	2 1-20%	3 21-40%	4 41-60%	5 61-80%	6 81-100%	7 N/A
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The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

1. First/last name missing or incomplete	46%	22%	8%	6%	4%	4%	10%
	196	95	35	24	18	19	42
2. Full address (street, city, state) missing or incomplete	33%	27%	13%	7%	6%	5%	10%
	141	116	54	28	26	21	42
3. Zip code missing or incomplete	33%	29%	11%	6%	7%	3%	10%
	142	123	49	26	32	13	43
4. Phone number missing or incomplete	35%	28%	11%	6%	5%	4%	10%
	151	119	45	27	23	17	44

Approximate percent of EAS forms I reviewed in the past 3 months where the User 14. Information was not accurate:

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1 None	2 1-20%	3 21-40%	4 41-60%	5 61-80%	6 81-100%	7 N/A
1. First/last name wrong	34%	32%	11%	4%	6%	3%	11%
	146	136	46	15	25	12	47
2. Full address (street, city, state) wrong	31%	31%	14%	5%	5%	3%	11%
	131	132	58	21	22	13	46
3. Zip code wrong	35%	32%	9%	6%	4%	2%	12%
	145	134	39	24	18	7	48
4. Phone number wrong	34%	33%	10%	5%	5%	2%	12%
	140	135	41	19	22	8	48

PROGRESS: 66% Complete

EAS Completeness/Accuracy - Employer Information

Approximate percent of EAS forms I reviewed in the past 3 months where the 15. Employer Information was not complete:

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1 None	2 1-20%	3 21-40%	4 41-60%	5 61-80%	6 81-100%	7 N/A
1. Full name missing or incomplete	21%	29%	16%	8%	7%	8%	11%
	89	125	68	36	31	33	49
2. Full address (city, state, zip code) missing or incomplete	18%	29%	15%	9%	9%	9%	11%
	77	122	63	39	38	38	47

Approximate percent of EAS forms I reviewed in the past 3 months where the 16. Employer Information was not accurate:

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1 None	2 1-20%	3 21-40%	4 41-60%	5 61-80%	6 81-100%	7 N/A
1. Full name wrong	22%	31%	14%	8%	7%	6%	13%
	93	132	61	33	29	25	56

2. Full address (city, state, zip code) wrong	21%	31%	14%	6%	8%	7%	13%
	90	132	59	26	32	30	55

PROGRESS: 73% Complete

EAS Completeness/Accuracy - Complaint Information

17. Approximate percent of EAS forms I reviewed in the past 3 months where the:






The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1	2	3	4	5	6	7
	None	1-20%	21-40%	41-60%	61-80%	81-100%	N/A
1. Description of Action Against Person in the Complaint Information section was not employment related	34%	33%	13%	6%	2%	3%	11%
	148	144	56	25	8	11	47
2. Reason for discrimination in the Complaint Information section was not one of the bases covered by EEOC	26%	37%	13%	8%	4%	2%	10%
	113	163	57	34	16	9	43






PROGRESS: 76% Complete

EAS Procedures

Approximate percent of the EAS forms I reviewed in the past 3 months that included a request to contact customers at a time 18. outside our office's normal work hours.

	Number of Responses	Response Ratio
None 	117	27%
1-20% 	163	38%
21-40% 	59	14%
41-60% 	22	5%
61-80%	16	4%
81-100%	9	2%
N/A 	48	11%
Total	434	100%

Approximate percent of the time I send out intake 19. questionnaires after reviewing the EAS form.

	Number of Responses	Response Ratio
None 	70	16%
1-20% 	81	18%
21-40% 	43	10%
41-60% 	42	10%
61-80% 	55	12%

81-100%		98	22%
N/A		53	12%
Total		442	100%

Approximate **number** of EAS forms I reviewed in the past 3 months that should have been sent to a different EEOC office 20. for processing:

		Number of Responses	Response Ratio
0		164	38%
1-3		161	38%
4-7		59	14%
8-10		20	5%
More than 10		24	6%
Total		428	100%

PROGRESS: 81% Complete

Group Wise Emails

Do you receive NCC Group Wise emails that require your 21. action?

		Number of Responses	Response Ratio
Yes		258	45%
No		316	55%
Total		574	100%

PROGRESS: 83% Complete

Group Wise Emails, continued

22. Approximate percent of NCC Group Wise emails I reviewed in the past 3 months that:

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1	2	3	4	5	6	7
	None	1-20%	21-40%	41-60%	61-80%	81-100%	N/A
1. Included a request to contact customers at a time outside our office's normal work hours	33% 80	44% 107	7% 16	6% 15	3% 7	2% 6	5% 11
2. Were to inquire about charge status	15% 36	37% 91	19% 46	9% 23	9% 21	8% 20	3% 7
3. Calling to complain about the processing or outcome of their closed charge	32% 77	40% 97	14% 33	8% 19	1% 3	3% 8	3% 7

Approximate percent of NCC Group Wise emails I reviewed in the past three months
23. where the information was:

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1	2	3	4	5	6	7
	None	1-20%	21-40%	41-60%	61-80%	81-100%	N/A
1. Accurate	8%	23%	13%	13%	19%	20%	4%
	19	56	32	31	46	50	11
2. Complete	12%	24%	15%	13%	15%	17%	4%
	28	57	35	32	36	41	10

PROGRESS: 90% Complete

Role of NCC

Assuming staffing levels at my field office do not significantly change, the EEOC
24. should consider permitting the NCC representatives to:

The top percentage indicates total respondent ratio; the bottom number represents actual number of respondents selecting the option

	1	2	3	4	5
	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
1. Input information directly into the IMS	14%	14%	14%	13%	44%
	122	124	120	114	383
2. Send out intake questionnaires	27%	23%	15%	9%	27%
	232	198	125	78	229
3. Provide litigation support (e.g. help with finding victims and/or administering settlements)	8%	7%	17%	15%	53%
	70	58	145	132	453

Please provide additional suggestions for improving the NCC's role in the EEOC's
25. operations and outreach activities.

[VIEW](#) 377 Responses

PROGRESS: 97% Complete

Role of NCC, continued

The NCC's role in the EEOC's overall enforcement and outreach
26. activities is to: (Check all that apply)

	Number of Responses	Response Ratio
Reduce number of calls that require field office attention	666	81%
Provide general information about EEOC law, potential charging party's options	677	83%
Handle calls not in EEOC's jurisdiction	472	58%
Gather trend information on employment issues affecting the public	250	31%

In the area below, please provide any additional comments you may have regarding 27. the areas covered by this survey or other NCC related issues.

[VIEW](#) 267 Responses

PROGRESS: 100% Complete

Thank you for your time and thoughtful responses to this survey!

When you select the "Submit" button your final responses will be submitted and you will be taken to the EEOC Internet site. Thank you!

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Interview Questionnaires

Appendix G. NCC Interview Protocol

Operations			
Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
OP-001	What reference aids are available to agents in addition to the desktop applications? What form do they take (binders, collection of hand-outs, roving support, etc.)? Where are these aids located (online, at workstation desk, team lead station, central location, etc.)?		
OP-002	How cross-functional are the customer service agents? How, and how often, are agents' cross-functional skills utilized (i.e. how, and how often, are agents reassigned to other customer service gates/functions)?		
OP-003	Describe the process for handling written (fax, letter, e-mail based) customer service requests. How is the handling of these requests prioritized?		
OP-004	Provide high-level description of the transaction flow process (by contact channel)		
Staffing			
Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
ST-001	What is the organizational structure and nomenclature? (e.g., agents, representatives, team leads, supervisors, managers)		
ST-002	Please describe the methods and channels used for agent recruitment. What initial screening assessments are used?		

Interview Questionnaires

Workforce Management

Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
WF-001	What tools are utilized to support the workforce management effort (forecasting, work force management, etc.)? How well are those tools suited to the needs of the business? What issues does the business experience through its use of the tools?		
WF-002	Is skill-based routing utilized? If so, please describe. Outline what skills are routed on.		

Training

Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
TR-001	Describe the initial agent training in terms of the following: length/duration (by contact type).		
TR-002	Describe the transition process to move agents from initial training to live customer contacts.		

Change Management

Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes

Interview Questionnaires

Change Management

Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
CM-001	Is information regarding legislation changes or other external events received far enough in advance to avoid adverse contact center impacts? Explain. Is information received complete? Explain.		

Interactive Voice Response Unit (IVR)

Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
IV-001	What self-service functions can be utilized with the IVR?		
IV-002	Is speech recognition functionality utilized for any of the IVR functions? If so, which ones and how is the speech recognition functionality used? How is the use of speech recognition functionality viewed by customers and members of the customer service group?		

Customer Satisfaction

Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
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Interview Questionnaires

Customer Satisfaction

Request Inquiry #	Question / Data Request	Information Collected	Comments/Notes
CS-001	Describe the method used to capture and measure customer satisfaction. List and describe any technologies used in this process.		

Performance Management

Request Inquiry #	Question / Data Request	Information Collected	Comments
PM-001	How is the call center's performance measured? Is there a "performance management" scorecard or quality scoring system/sheet? If so, please detail the system and/or provide available documentation. How often is the call center performance reviewed? Who is involved in the evaluation process and how are they involved?		
PM-002	Describe the call monitoring process (i.e., all calls recorded or a %, remote vs. side-by-side, etc.). How often is it conducted per agent? Are those responsible for conducting call monitoring meeting those monitoring requirements? Who are those responsible (Pearson staff and/ or EEOC personnel)? What tools are used to conduct call monitoring? Describe the calibration procedures.		
PM-003	Describe additional quality assurance practices.		
PM-004	Describe the agent coaching process and the documentation used.		

Appendix H. NCC Focus Group Protocol

**NCC Evaluation
Lawrence, KS – Focus Group Meeting Minutes**

PEARSON ATTENDEES:	
CVG ATTENDEES:	
NOTES PREPARED BY:	
PURPOSE OF MEETING:	

Meeting Notes	
■ INTRODUCTIONS	
■ WHAT MAKES YOUR WORK EXCITING	
■ WHAT MAKES YOUR WORK CHALLENGING	
■ COACHING, TRAINING	
■ SCRIPT AND WRAP UP ACTIVITIES	
■ IF YOU COULD CHANGE SOMETHING, WHAT WOULD THAT BE?	
■ SUMMARY OF OBSERVATIONS	

Appendix I. Trend Information Desired by EEOC Offices

Following is a listing of the types of trend information that directors indicated they would like to receive.

- Number of calls screened out by the NCC phone tree and number screened out by the CSRs**
- Number of calls not referred to EEOC Offices (screened out), by statute, bases, and issue**
- Number of calls sent to EEOC offices in error (misdirected)
- Frequency of repeat callers for charge status
- Listing by month of EASQs the EEOC offices receive*
- Number of EASQs that actually become charges (provided that they have been properly coded in the IMS)*
- Overall number of calls referred to each EEOC office broken down by type (e.g. number of potential charges, charge status inquiries, technical information inquiries, inquiries on pending litigation, general information inquiries, and number referred to another agency, etc.)***
- Calls broken down by Basis/Respondent
- Categories of inquiries, such as status, file charge, or general complaint about the office.
- Basis/issue of inquiries referred by race, sex, national origin, age, and ADA (disability) by zip code/county/city
- Complainant demographics (ages, races and gender) by bases and issues, jurisdiction of calls****
- Breakdown of apparently jurisdictional inquiries by statute, bases, and issues
- Inquiries by region/bases/issue to help determine where expanded presence or outreach activities should be aimed
- Type of Issues being alleged and bases; regional differences
- Calls from underserved areas
- Inquiries/complaints by industry (SIC or occupational code) and employer
- Analysis of companies against whom callers most complain and type of basis/issues
- List of the top ten companies with complaints by geographical area
- Hotline calls report (number of calls that are within 30 days before and after the Statute of Limitations expiring)
- Language inquiries

* EEOC offices can generate this information

** This information is available in the monthly NCC report across all offices but not for each office

*** This information was recently developed for all EEOC offices combined and can be provided by office

****Currently being developed

Appendix J. Combined Cost Assumptions

The JPS Team attempted to quantify the NCC's impact on EEOC operations in terms of time saved based on the information gathered from the NCC reports and the call monitoring data. The team made the following assumptions based upon their experience in evaluating call centers and what they believe is reasonable:

- Increase in call volume (Best Case – 100%; Most-Likely – 50%; Worst Case – 25%)
- Increasing the inquiring to resolve more calls at NCC (Best Case – 15%; Most Like – 10%; Worst Case – 5%)
- Improving the resolution of non-Charge related calls (Best Case – 10%; Most Likely – 5%; Worst Case – 0%)
- The team was unable to ascertain time spent by EEOC offices in handling calls related to increased inquiring; therefore, it assumed that, on an average, it takes 6 minutes for all calls and about 15 minutes for calls related to 'filing a Charge.'

The cost of the NCC taking live customer calls is \$1.2 million per annum. This does not include Management costs incurred by EEOC.