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From: Maureen Rudolph <mrudolph@usccr.gov>
Cc: Brian Walch <bwalch@usccr.gov>
Sent: Mon, Apr 10, 2017 2:53 pm
Subject: FOIA 2017-27

The U.S. Commission on Civil Rights (USCCR) received your request under the Freedom of Information Act (FOIA) asking that we provide: "a copy of the most recent Organizational Assessment for USCCR reviewing Regional Operations." The USCCR found agency records responsive to your request. Please find attached to this email, a pdf electronic file of the information you have requested. This information should fully satisfy your request. If you need any further assistance or would like to discuss any aspect of your request, please contact our FOIA Public Liaison, Brian Walch, at bwalch@usccr.gov or 202-376-8371.

Sincerely,

Maureen E. Rudolph
General Counsel and Chief FOIA Officer



U.S. Commission on Civil Rights

December 2016

Regional Program Unit Organizational Assessment: 2016 Final Report

U.S. Commission on Civil Rights

The U.S. Commission on Civil Rights is an independent, bipartisan agency established by Congress in 1957. It is directed to:

- Investigate complaints alleging that citizens are being deprived of their right to vote by reason of their race, color, religion, sex, age, disability, or national origin, or by reason of fraudulent practices.
- Study and collect information relating to discrimination or a denial of equal protection of the laws under the Constitution because of race, color, religion, sex, age, disability, or national origin, or in the administration of justice.
- Appraise federal laws and policies with respect to discrimination or denial of equal protection of the laws because of race, color, religion, sex, age, disability, or national origin, or in the administration of justice.
- Serve as a national clearinghouse for information in respect to discrimination or denial of equal protection of the laws because of race, color, religion, sex, age, disability, or national origin.
- Submit reports, findings, and recommendations to the President and Congress.
- Issue public service announcements to discourage discrimination or denial of equal protection of the laws.
- Establish advisory committees in every state and the District of Columbia

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**REGIONAL PROGRAM UNIT ORGANIZATIONAL
ASSESSMENT: 2016
FINAL REPORT**

Acknowledgements

This report was prepared for the U.S. Commission on Civil Rights by Optimal Solutions Group, LLC. The report was produced under the direction of Michele Shaw, project director for this assessment. The report was prepared by Kashni Sharma, project manager. Mark Turner provided guidance as the corporate representative and senior reviewer.

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USCCR RPCU Organizational Assessment – Final Report

Executive Summary

From August to November 2016, Optimal Solutions Group, LLC (Optimal), conducted an organizational assessment of the U.S. Commission on Civil Rights (USCCR) Regional Program Coordination Unit (RPCU), with a particular emphasis on the physical infrastructure. This report presents findings and results from the assessment, including interview outcomes, a cost-per-person model (CPPM) analysis for the regional offices (ROs) within the RPCU, proposed scenarios along with their impacts, and recommendations to improve the productivity and efficiency of USCCR's RPCU.

The findings from this assessment that focus on the physical infrastructure conclude that each RO is operating with real estate costs higher than the average of 80 usable square feet (USF) per person. The majority of the RPCU staff interviewed confirmed that their work supporting the agency's advisory committees (SACs) can be performed remotely as long as appropriate collaboration tools (e.g., ReadyTalk, Box) are readily available. However, because of the significant staffing shortage within the ROs, some offices depend on extensive internship programs for additional staffing. In some cases, interns operate as one additional full time employee (FTE). These intern programs require physical space.

The major recommendation is to consolidate ROs physical infrastructure and utilize telework for staff in regions that no longer have leased office space. Furthermore, Optimal recommends improving collaboration within the USCCR and across ROs by streamlining administrative instructions (AIs), teleconference systems, and cloud-sharing systems. Specifically, the following next steps are encouraged and highlighted:

- Terminate leases for selected ROs
- Improve collaboration tools to support SAC facilitation (i.e. – ReadyTalk, Box)
- Refine and utilize a SAC support workload assessment model
- Expand RPCU staffing at the Civil Rights Analyst level
- Reduce full-time equivalent administrative staffing in ROs; increase usage of intern programs and/or contractor support
- Institute topic area SAC assignments based on subject-area expertise or interest of SAC and RO employees
- Establish and communicate USCCR and RPCU performance metrics
- Conduct detailed benchmarking of selected practices with similar organizations

Introduction

Assessing and improving the efficiency of organizational practices is critical to meeting institutional goals. Assessment results provide initial baseline data that can be tracked to demonstrate organizational maturity and allow for the quantitative measurement of improvements when new or updated processes and procedures are implemented. Assessment baseline measures not only provide an understanding of current organizational capability, they can also demonstrate how a management improvement affects enterprise-wide business goals and objectives and generates a return on investment. Such internal organizational monitoring can be overlooked or undervalued as administrators aim to satisfy mission goals and improve their outcomes without a balanced focus on internal system improvements.

The USCCR is an independent, bipartisan, fact-finding agency that investigates and reports on the status of civil rights of U.S. citizens. Primary areas of focus include studying the impact of federal laws with respect to civils rights, investigating allegations of discrimination, utilizing SACs to advise the Commission on civil rights issues, and collecting information in a national clearinghouse to support its work. The USCCR is composed of several offices, including six regional offices (ROs) that support its mission. ROs are responsible for coordinating state- and local-level studies as well as fact-finding activities of the Commission's SACs. The USCCR seeks to identify and develop recommendations for improvement of the overall performance of their USCCR Regional Office Operations.

Goals and Objectives

Assessments can typically include evaluations of organizational aspects such as physical infrastructure, staff configuration, human capital, policies and procedures, and performance metrics. According to the project scope/schedule, this USCCR assessment is focused primarily on physical infrastructure and staff configuration, with recommendations provided in other areas noted above, where possible.

Specifically, Optimal assessed USCCR to determine if the cost per person within the ROs is significantly different than comparable government agencies historically, currently, and in the future with no infrastructure changes. Within this report, Optimal provides several scenarios for infrastructure realignment (e.g., office consolidation) and a re-estimate of the cost per person in order to project the next 5 years and provide valuable input to USCCR decision-making centered upon physical infrastructure and staff configuration.

USCCR Overview

Currently, the USCCR RPCU consists of six ROs, including:

- Eastern Regional Office (ERO) located in Washington, DC
- Southern Regional Office (SRO) located in Atlanta, Georgia
- Midwest Regional Office (MWRO) located in Chicago, Illinois
- Central Regional Office (CRO) located in Kansas City, Missouri
- Rocky Mountain Regional Office (RMRO) located in Denver, Colorado
- Western Regional Office (WRO) located in Los Angeles, California

Primary roles within the RPCU include the RPCU Supervisory Chief, Regional Directors, a Deputy Regional Director, Civil Rights Analysts, Management Analysts, and Administrative Support personnel. Employees assigned to the individual ROs are identified in figure 1.

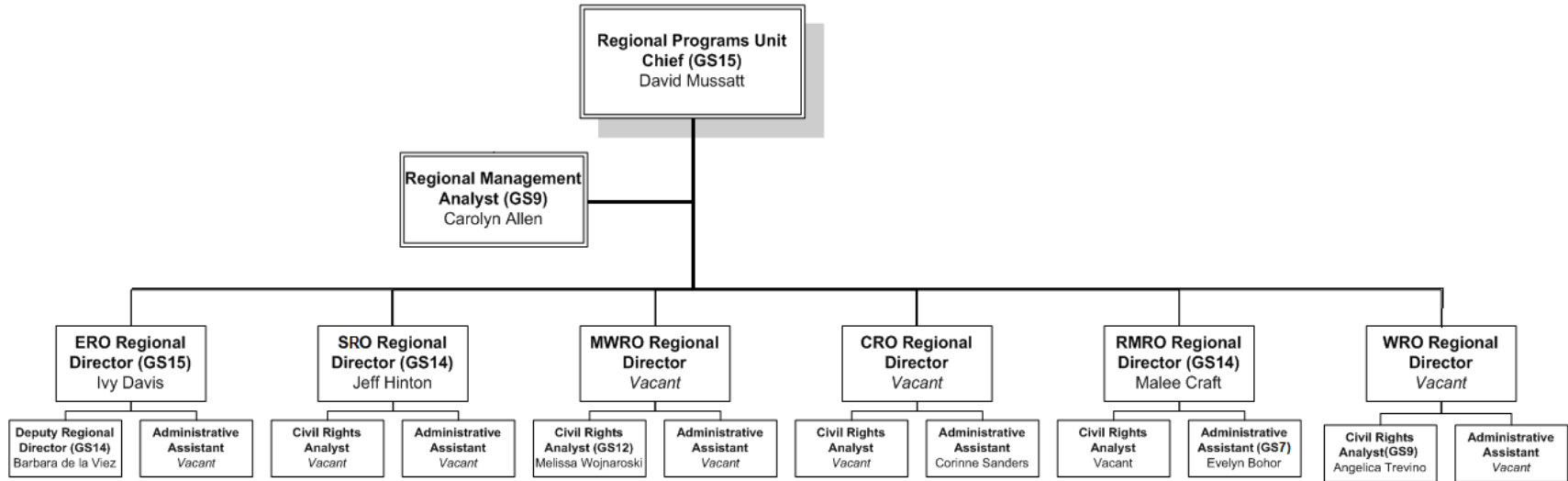
In total, the RPU currently employs **10 personnel** who support **51 SACs**. Civil Rights Analysts, Deputy Regional Directors, and Regional Directors of individual ROs are responsible for working as the Designated Federal Official (DFO) for SACs in their region. In addition, each RO performs administrative activities to support operations of the individual office. In general, DFO-related activities must be performed for each SAC and include monthly and quarterly activities to ensure that SAC membership is current and maintained, SAC projects are identified and researched, and topic reports are generated that provide advice to the agency at large. DFO activities are reported in six phases: orientation, concept, project proposal, hearing planning, report drafting, and publication. For the purpose of this report, Optimal has assessed DFO activities and grouped them into three higher level stages: initiation, research, and report. The following list summarizes the primary activities performed by a DFO for each SAC:

- Initiation Stage including orientation, concept, project proposal
 - Recruit committee membership of 11–17 volunteer members in each SAC
 - Prepare SAC appointment packages
 - Plan for and organization quarterly SACs meetings
 - Assist SACs with generating ideas for pertinent project proposals
 - Draft project proposals given the selected ideas and obtain approval
- Research Stage including hearing planning
 - Gather data for SAC meeting given the approved project
 - Plan for and organize monthly SAC project meetings
 - Assist SAC in identifying diverse panelists of project hearings
 - Perform outreach to panelists
 - Prepare for and facilitate community hearings on selected project topic
- Report Stage including report drafting and publication (approximate duration could be 2 to 3 months)
 - Prepare draft report given hearing results and data collected
 - Coordinate with individual SAC members, as needed
 - Review with SAC and USCCR general counsel
 - Plan for and organization SAC meetings every 2 to 3 months

DFOs are required to document the SAC activities per Federal Advisory Committee Act (FACA)¹ regulations, which includes capturing the results of each SAC meeting.

¹ <http://www.gsa.gov/portal/content/104514>

Figure 1. USCCR Organizational Chart



Assessment Findings

This section summarizes the analyses conducted during the USCCR assessment, including a physical infrastructure assessment, a workload assessment, and a high-level benchmarking review.

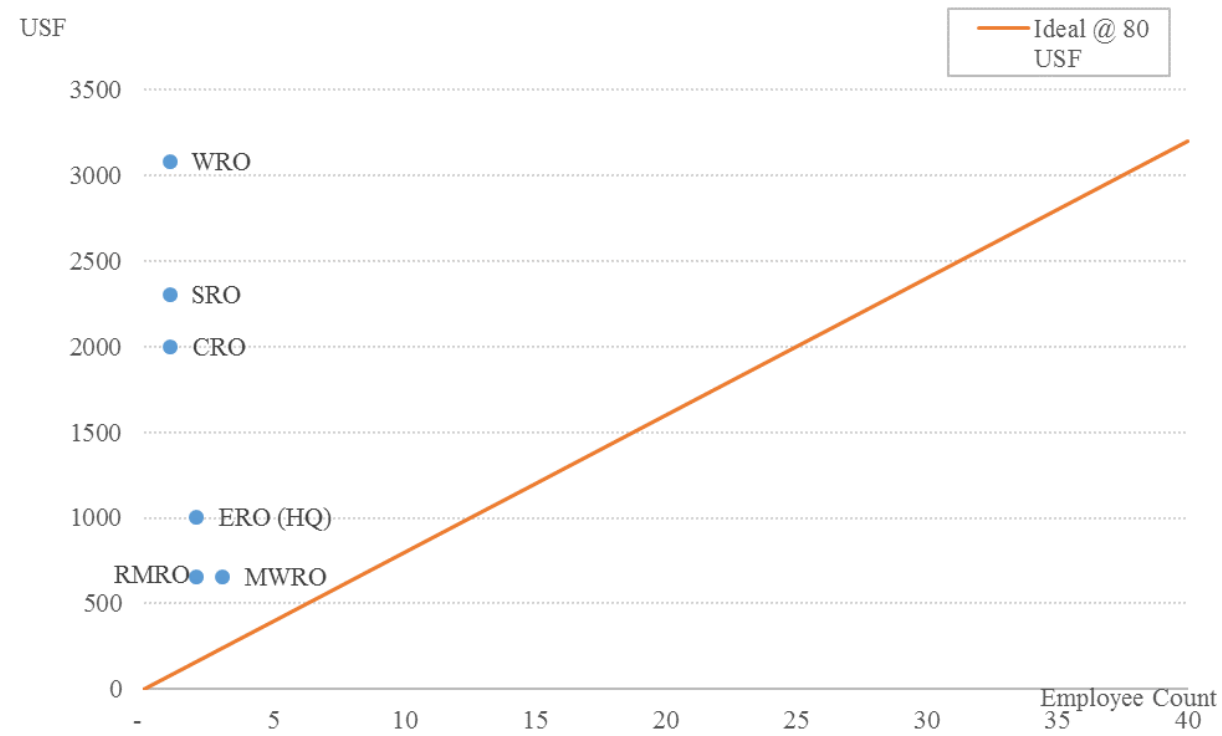
Physical Infrastructure Assessment

The CPPM 2.0 is a tool developed by GSA that calculates cost per person for real estate, individual information technology, and telecommunications.² The model takes into account variables such as square footage of office space, number of workspaces, cost and quantity of mobility devices (i.e., laptops, smartphones), number of employees, and number of teleworkers to estimate annual costs for an organization and per person.³

CPPM 2.0 provides insight to understand the overall cost contributions of different offices within an organization and is beneficial for developing scenario analyses related to changing office structures, improving space, or re-negotiating agreements. Moreover, it can assist with decision-making. CPPM 2.0 also serves as a standard for benchmarking the amount of usable square feet (USF) per person of a collaborative workspace at 80 USF.⁴

The following analysis is based upon data provided by USCCR as shown in appendix D. Figure 2 below outlines the USF per person at each of the RPU's within the USCCR. In addition, the orange line outlines the benchmark of the recommended 80 USF.

Figure 2. USF per person of USCCR⁵



² <http://www.gsa.gov/portal/content/105134>

³ http://www.gsa.gov/portal/mediaId/146871/fileName/CPPM20_User_Manual_Final.action

⁴ http://www.gsa.gov/graphics/ogp/Workspace_Utilization_Banchmark_July_2012.pdf

⁵ The Chicago office effectively has one additional F.T.E. because of its internship program with the University of Chicago School of Social Administration

As shown above, there is space available within every RO to consolidate or reconfigure since each RO is well over the recommended USF benchmark of 80 USF.

During interviews with RPCU staff, Civil Rights Analysts and support staff widely agreed that it is *not* necessary to be co-located in the same metropolitan area or region of the country as the SAC being supported. They stated that 98% of the work required to facilitate the SAC can be accomplished remotely and the SAC role is to be “the local expert,” whereas the DFO is the facilitator. However, most of the Regional Directors stressed the importance of having a regional presence to provide face-to-face support and enhance relationship building in that region with the SACs. This was especially important for regions that worked in close collaboration with certain SACS.

Presented below are several scenarios for the Commission to consider in order to reduce cost and potentially increase performance of the RPCU. Table 1 provides a summary of total cost savings associated with each scenario in the first year as well as over the length of the remaining lease in each RO. The infrastructure cost savings below were calculated using net present value and include lease terminations fees. Note that costs aside from leasing fees were not taken into account.

Table 1. Savings associated with each scenario

	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Savings in Year 1	\$ -	\$78,397.63	\$160,295.00	\$160,295.00
Present Value of Savings	\$ -	\$322,541.00	\$580,847.00	\$580,847.00

Scenario 1: No Change

CPPM V2.0 shows that USCCR is absorbing very high costs for each employee within both the commission and RPCUs, which is primarily driven by real estate costs. The estimated number of workspaces in comparison to the number of full-time employees in each office is disproportional. This indicates that USCCR is paying fees for workspaces that are not being utilized by employees in the ROs. It is not advisable that USCCR maintains its current structure of ROs because, with the exception of the ERO that is housed within the commission, real estate costs by person are highest within the model. Figure 3 below outlines the costs per person at each ROs, broken into real estate, telecommunications, individual information technology (IT), and mobility device costs.

Figure 3 outlines the costs per person at the commission as well as at each individual RO and the amount of real estate costs that make up the cost per person. Furthermore, figure 4 breaks down the size of the RPU and the number of regional office employees recommended for this scenario.

Figure 3. Total cost per person of USCCR Commission and ROs⁶

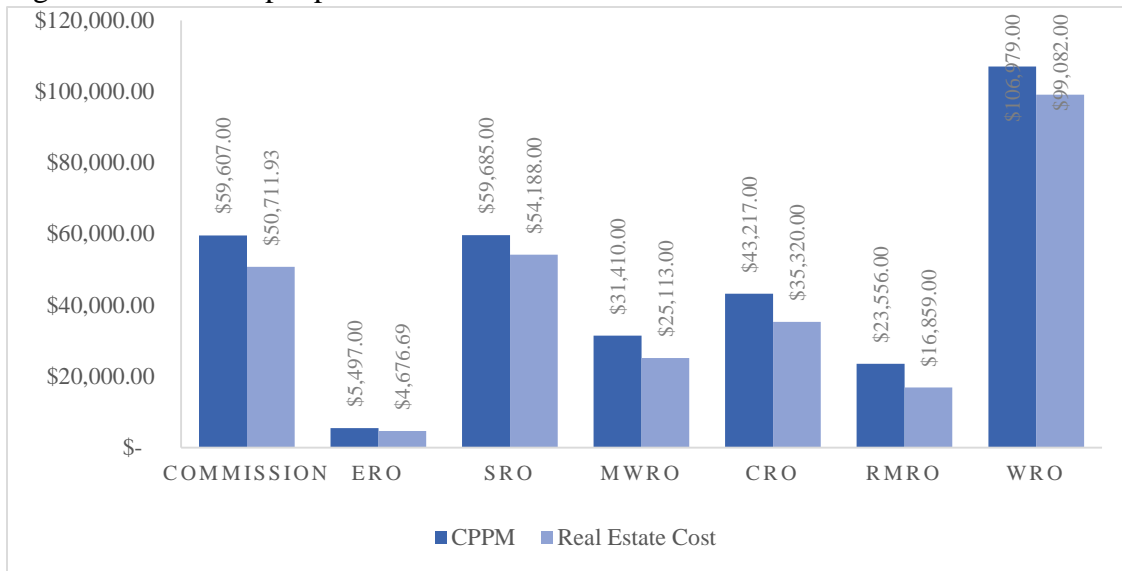
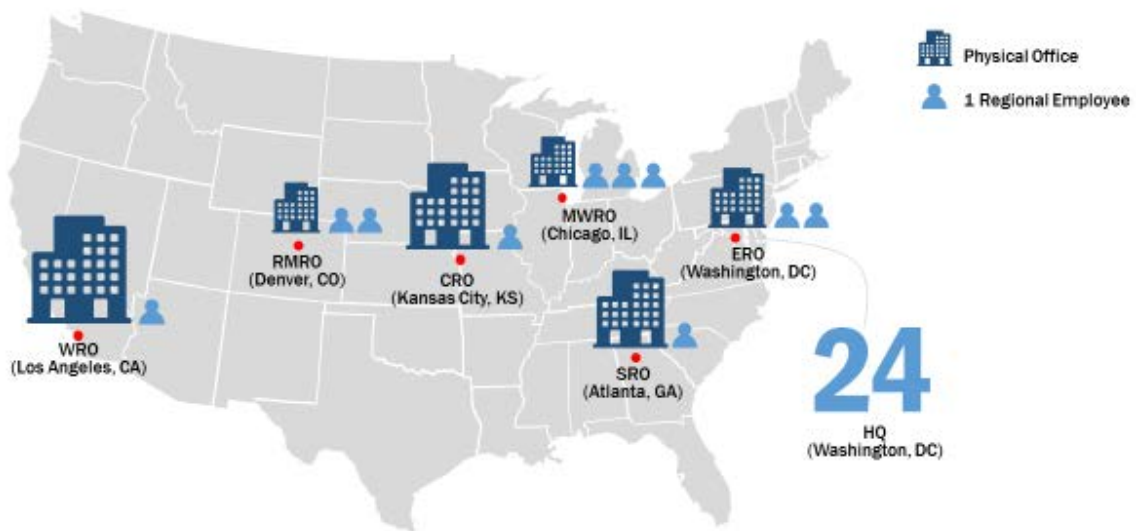


Figure 4. Physical infrastructure and regional employee adjustments

Scenario 1



Scenario 1: Pros / Cons

- Pros
 - No impact on current employee's location.
 - DFOs remain closely situated with the SACs they are supporting.
 - No initial moving / relocation/ HR costs

⁶ Note that the real estate cost for ERO is calculated based off of the real estate cost of the Commission, due to the fact that this regional center operates with the USCCR Commission headquarters in Washington, DC.

- Cons
 - No reduction in cost to the organization or change in CPPM cost per person that accelerates over time.
 - Structured collaboration between offices, DFOs, and commission headquarters is required to effectively transfer knowledge.

Scenario 2: Consolidation of RPUs

To consolidate ROs, a phased-in approach that would adjust the staffing and RO structure to one DFO for every 4.5 SACs was assessed. Phase I of this approach would consolidate:

- CRO into the MWRO.
- RMRO into the WRO.

The second phase would include:

- Relocating the WRO into a smaller space to reduce the real estate costs.
- SRO would be integrated into the ERO.

The third and final phase of this restructuring would be to roll out virtual offices, using an updated teleconference and webinar service, to allow for a flow of communication across the United States with the SACs, ROs, and commission.

Figure 5 outlines the decrease in costs per person for the consolidated ROs during phases I and II and includes the real estate cost of the cost per person. Note that the costs for the WRO are subject to change, based on the leasing costs of the relocated office space. Furthermore, figure 6 breaks down the size of the RPCU and the number of regional office employees recommended for this scenario. Figure 7 provides the USF per person for this scenario against the benchmark of 80 USF per person, recommended by GSA for technical and support staff.

Figure 5. Cost per person of consolidated RPUs

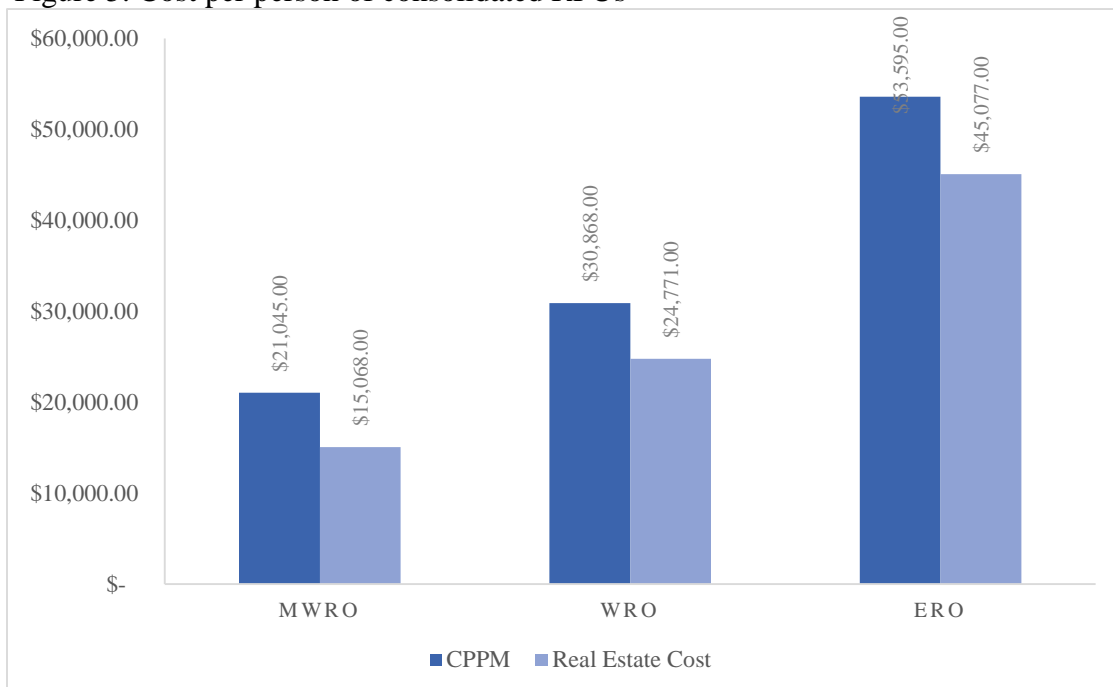


Figure 6. Physical infrastructure and regional employee adjustments

Scenario 2

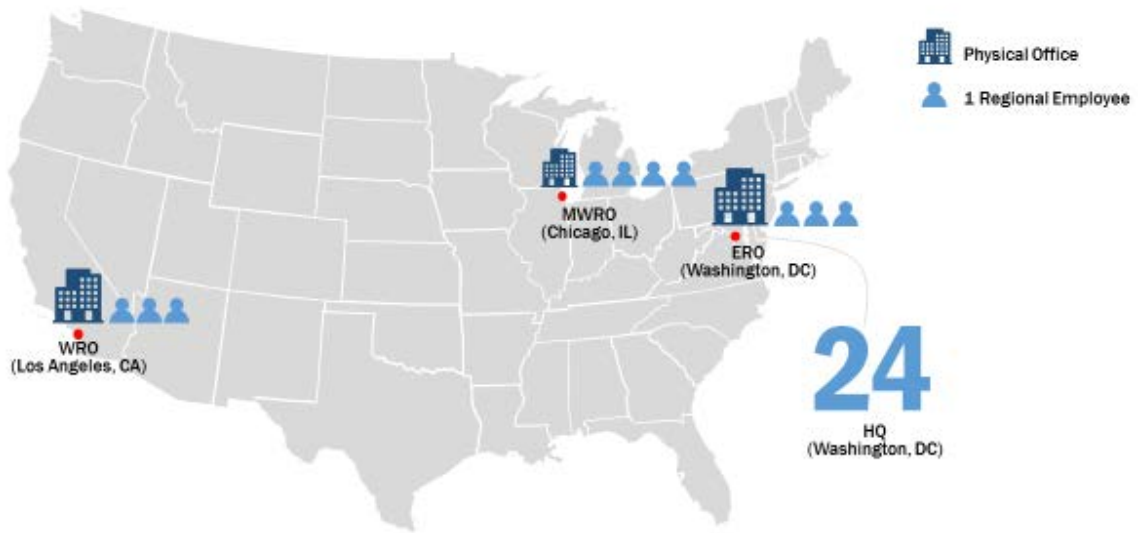
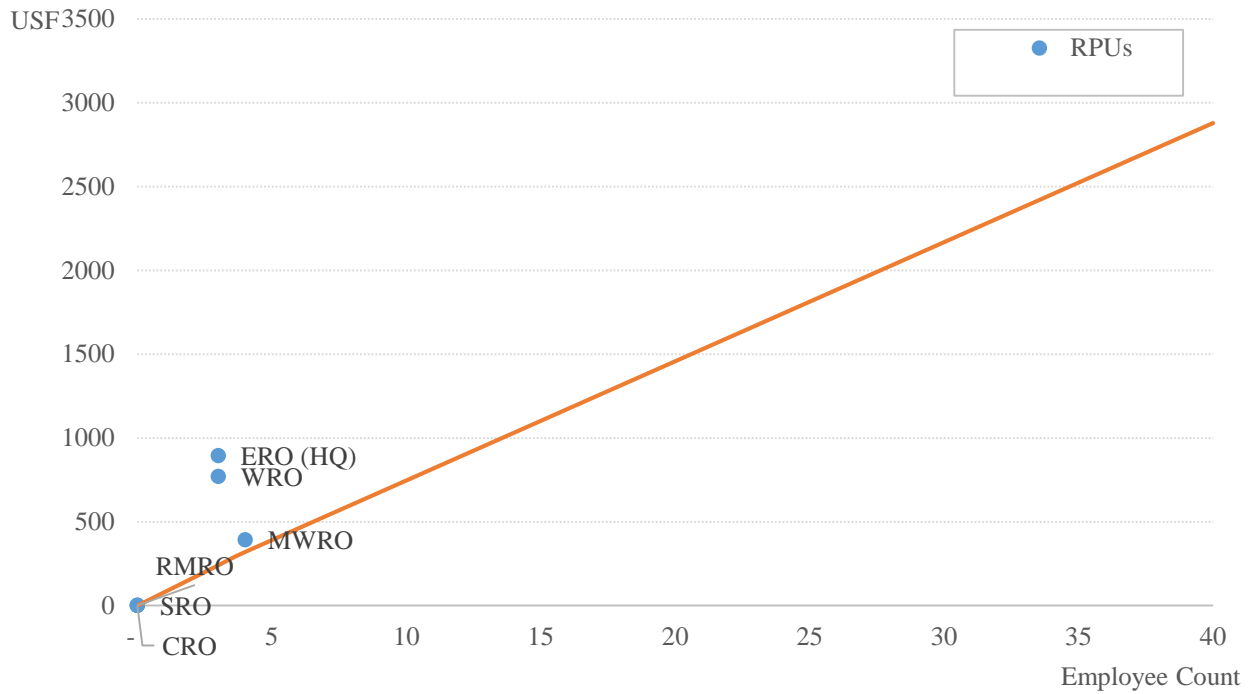


Figure 7. USF per person of Scenario 2



Scenario 2: Pros / Cons

- Pros
 - Projected rental savings from closed offices is \$78,397.63 in the first year⁷.
 - Enhanced collaboration between combined offices.
 - Improved video and web conferencing capabilities assuming the cost saving is used to invest in better tools.
- Cons
 - Initial moving, relocation, and HR costs
 - Potential loss of employees given the change in their location.
 - Telework could be offered as an option.
 - Cost to hire replacement employees would need to be considered.
 - Potential political challenge of not having a southern presence, given Southern regional office is removed.

Scenario 3: Virtual RPUs / Teleworking

Removing all physical RPCU offices would reduce the real estate costs in the long term. The short-term costs would be the fees associated with breaking lease terms. Based on the information collected, the termination fee for each RPCU office is 1/3 the cost of the annual lease amount. The offices that still have at least half of their time left on their lease, as of 2016, are

- SRO (4 of 5 years)
- RMRO (8 of 10 years)
- MWRO (3 of 5 years)
- ERO (6 of 10 years)

It is important to note that the ERO is housed within the commission in Washington, DC. Not including the ERO, USCCR pays \$248,691.00 annually in leasing costs for ROs. To break the leases of the four RPUs, USCCR would have to forfeit a short-term cost of \$82,897.00, which is the total of the termination fees associated for the four RPUs.

USCCR could then implement a telework policy that would allow all RPCU employees to work remotely and have one physical office. The USCCR would save real estate costs in the amount of the total annual leasing costs, which would allow additional funds to be allocated towards staffing, improving the teleconference system, and creating a standard set of operating procedures and communications protocols. Figure 8 breaks down the cost per person of the USCCR utilizing virtual RO locations and the associated real estate costs. Furthermore, figure 9 breaks down the size of the RPCU and the number of regional office employees recommended for this scenario. Figure 10 provides the USF per person for this scenario against the benchmark of 80 USF per person, recommended by GSA for technical and support staff.⁸

⁷ Note this report does not quantify the costs for administrative costs for closing the selected offices, moving/relocation expenses, etc.

⁸ https://www.gsa.gov/graphics/ogp/Workspace_Utilization_Benchmark_July_2012.pdf

Figure 8. Cost per person with virtual RPUs

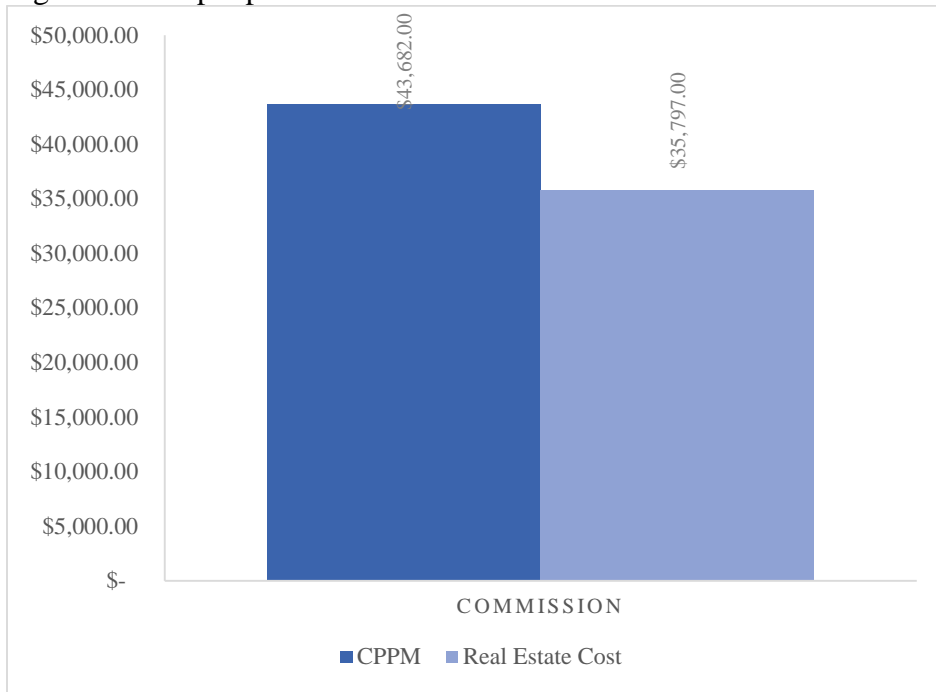


Figure 9. Physical infrastructure and regional employee adjustments

Scenario 3

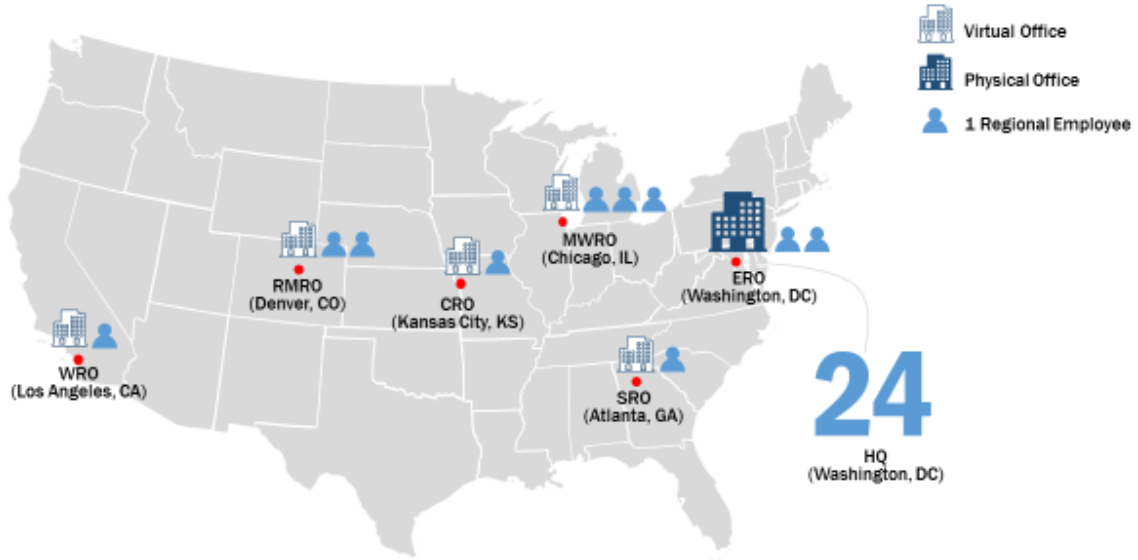
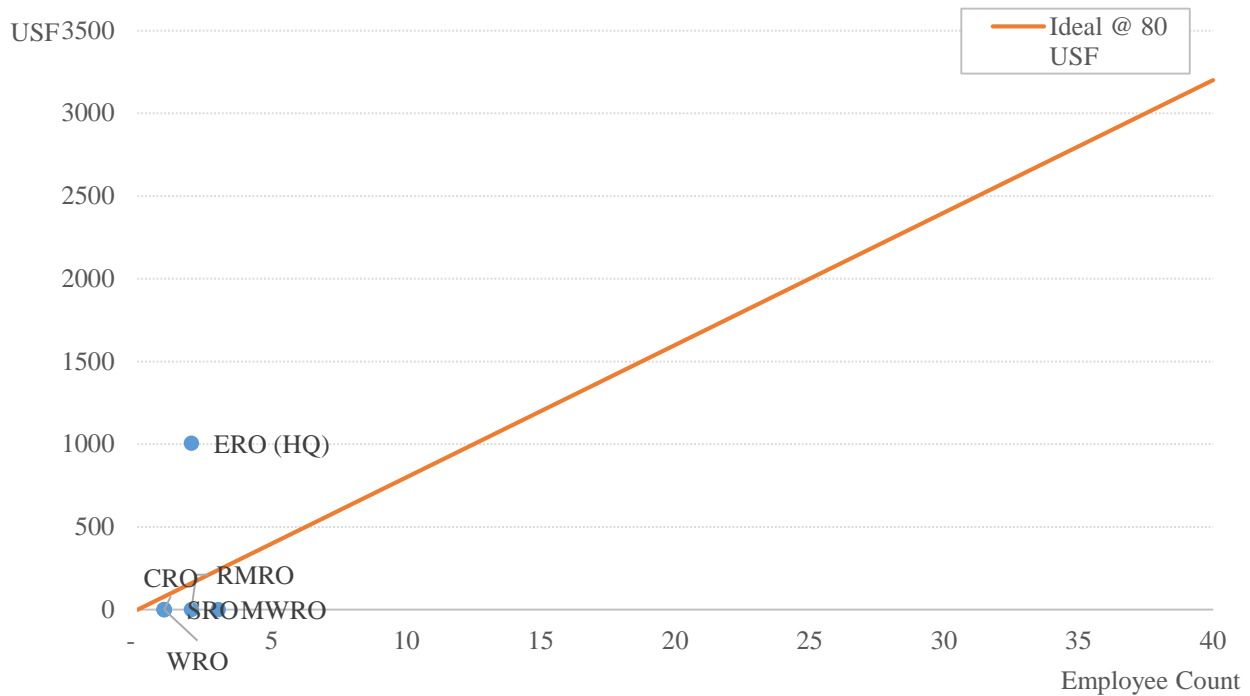


Figure 10. USF per person of Scenario 3



Scenario 3: Pros / Cons

- Pros
 - Projected rental savings from closed offices is \$160,295.00 in the first year⁹.
- Cons
 - Transition time for employees needs to be taken into account, given the major change from working routinely in a RO to their home or a public office space.
 - Internship program would have to be discontinued

Scenario 4: Centralized Office – No Telework – Physical / New Space Required

The fourth consideration taken during this assessment was to remove all physical ROs and undergo a move to one physical office for USCCR. The RPUs across the nation would close and regional employees would be relocated to Washington, DC, to work in the commission’s office, as the ERO does. The regional presence of USCCR would be exclusively through the SACs. and they would regularly communicate with the staff to facilitate reports, hearings, and SAC meetings. Additionally, travel costs between the centralized office in Washington, DC to states would increase given all SAC meetings must have a DFO present. The costs to undergo this change would be the same as Scenario 3, however, the need for a telework policy for RPUs would not be needed. The CPPM for this scenario would be the same as creating virtual ROs, as seen in figure 8 above, but the benefit of this approach is that the centralized office would help facilitate communication across the USCCR and optimize the workspaces available in the Commission office. Figure 11 breaks down the size of the RPU and the number of regional office employees recommended for

⁹ Note this report does not quantify the costs for administrative costs for closing the selected offices, moving/relocation expenses, etc.

this scenario. Figure 12 provides the USF per person for this scenario against the benchmark of 80 USF per person, recommended by GSA for technical and support staff.

Figure 11. Physical infrastructure and regional employee adjustments

Scenario 4

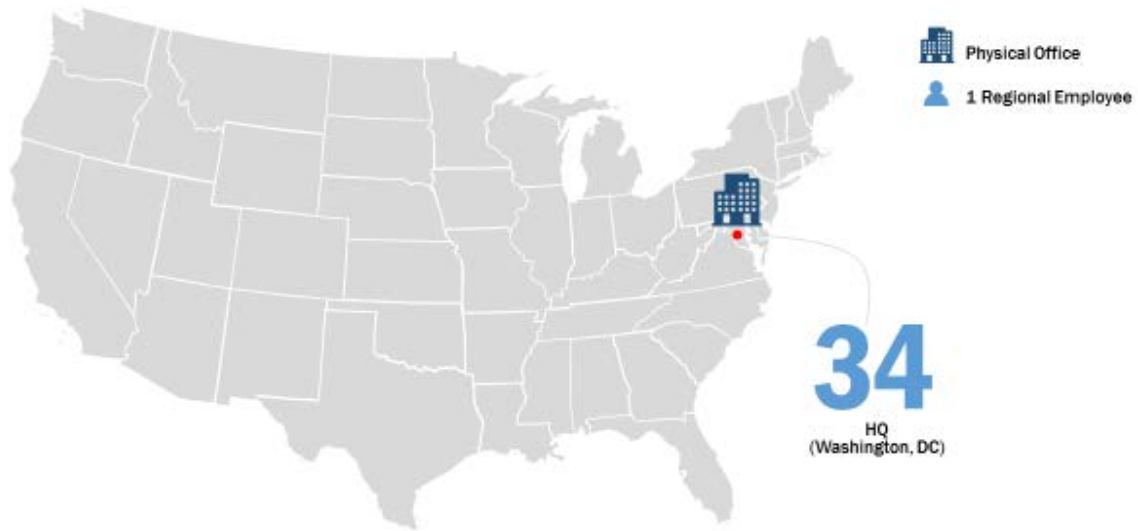
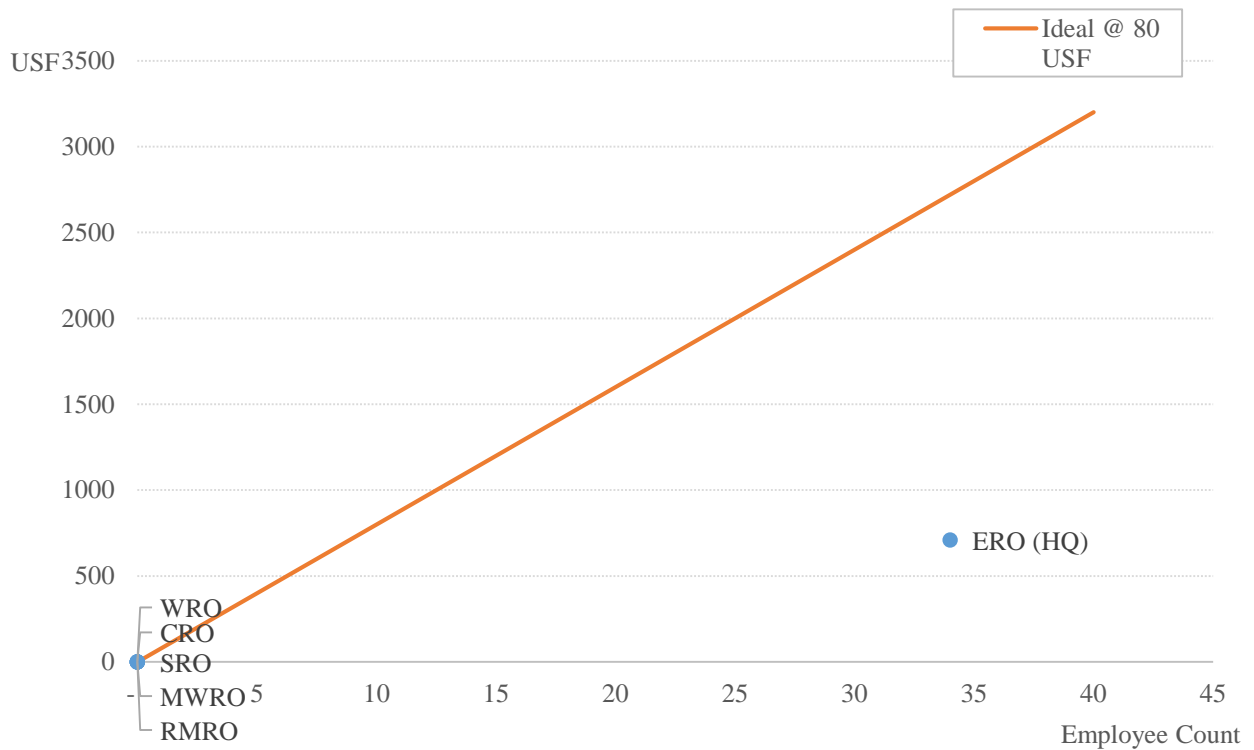


Figure 12. USF per person of Scenario 4



Scenario 4: Pros / Cons

- Pros
 - Projected rental savings from closed offices is \$160,295.00 in the first year¹⁰.
 - Improved communication among HQ and RPU employees working from one location.
- Cons
 - Need to move to larger DC space, given there is insufficient space in Headquarters to accommodate all staff.
 - Potential cost of breaking DC lease
 - Potential loss of RPU employees due to a major location shift.
 - Cost to hire new employees would need to be considered.
 - No regional presence of USCCR employees outside of SACs
 - Challenge of coordinating meetings in western time zones
 - Risk of undue influence and loss of SAC independence and autonomy
 - Potential loss of established intern program across states in ROs
 - Politically challenging to lose regional presence

Workload Assessment

USCCR RPCU is considering a workload baseline of one DFO assigned to four (4) committees. The current RPCU workforce of 10 employees is expected to support 51 SACs with approximately 11 to 17 members in each committee.

During qualitative interviews with staff, the following was expressed related to the workload assessment:

- An AI authorizing 4-year terms versus 2-year terms for committees has been beneficial and has increased efficiency.
- There are recurring themes or topic areas across SAC committees, including voting rights, police and community relations, criminal justice, and education.
- In some cases, the completion time for activities in which Commission support is required is excessive (e.g., authorization of purchases, payment of vendors, IT-related requests, processing of SAC appointment packages).
- The method of interacting with SACs has changed dramatically over the years given the reduction of funds to support the RPCU activities during that same period.
 - Now face-to-face interaction with the SAC occurs only with hearings in which testimony is provided.
 - Video conferencing and conference calls via ReadyTalk is used much more extensively; however, video conferencing is limited to four but SACs hold up to 12-14 participants.
 - In person pre-hearing preparation time has been reduced for DFOs.
- RPCU employees expressed concern with the communication between the ROs and Commission.
 - Limited inclusion of key personnel on the development of important artifact updates (e.g., AI on SAC appointments and SAC Member Handbook).

¹⁰ Note this report does not quantify the costs for administrative costs for closing the selected offices, moving/relocation expenses, etc.

Optimal prepared an initial workload breakdown that begins to provide a model for estimating support required for SACs to assess the feasibility of such a goal. The analysis includes estimated hours for DFO activities over a hypothetical 1-year period for each SAC phase (initiation, research, report writing) outlined in the USCCR RPCU Overview section of this report. These activities and estimates provide a baseline for further understanding SAC specific workload requirements of DFOs – see appendix C.

The result of this analysis, in table 2, shows that each DFO can potentially support three (3) to four (4) SACs per year; however, several important considerations should be highlighted:

- Every activity may not be done each year given the nature of the SAC. For example, SAC initiation activities of recruitment and membership package submission occurs every 4 years only.
- Currently, multiple RO employees (e.g., Regional Director, Civil Rights Analyst) may perform DFO activities and this workload analysis does not consider multiple roles and experience levels performing the same tasks. This could be included as another factor in the model as a way to tailor the model for individual personnel in RPCU.
- Remaining hours available should be scrutinized to ensure that it sufficiently covers non-DFO activities, including RPU status meetings, office tasks, and vacation time for each individual modeled.

Table 2. DFO SAC work breakdown summary

SAC Support Phase	Estimated			Note
	Hours	Days	Weeks	
Initiation Phase (Months 1-4)	128	16	3.2	8 hour days and 40 hour weeks
Research Phase (Months 5-9)	144	18	3.6	
Report Writing Phase (Months 10-12)	164	20.5	4.1	
Total SAC Support (year 1)	436	54.5	10.9	See DFO activities and estimates
Total 5 SACs	2180	272.5	54.5	
Resource Availability	2080	260	52	Assumes full-time person
Total 4 SACs	1744	218	43.6	
Total 3 SACs	1308	163.5	32.7	
Hours Remaining (after 4 SACs)	336	42	8.4	Remaining hours should cover non-DFO activities including RPU specific meetings, office tasks, vacation etc.
Hours Remaining (after 3 SACs)	772	96.5	19.3	

Assumptions have been made in this workload assessment, including:

- The activities presented in appendix C reflect the full spectrum of DFO actions required to support a SAC.
- The estimated hours for each activity compare well with actual RPCU historical data given past SAC support.

While this model is an initial start to understand the overall resource requirements for SAC support, it can be further refined by adjusting activities and estimates, if needed. In addition, the model can be further improved through the addition of certain factors. For example, individual activities (e.g., recruiting SAC membership or writing reports) can be driven by the number of SAC committee members and the estimated size (page count) of the expected report, respectively. Another factor that could be considered is the experience of the DFO that is being modeled.

Related to workload planning, consideration should be given to the following:

- **Goal-setting:** Is a goal for DFOs based on the number of SACs or the number of projects performed each year the best metric? Perhaps a better goal for an individual DFO may be effective completion of a project that results in a written report every year versus general SAC support. Additional consideration needs to be given to how “effective” is defined since reports should be written that include recommendations to be considered and implemented by the Commission.
- **Resource gaps:** Leverage other mechanisms to increase the likelihood of achieving the RPCU goal of supporting four SACs per year. For example, seeking out contract or intern resources in a more formalized way across the RPCU may be helpful to assist with DFO-focused activities at the ROs. This would also reduce the burden RPCU staff is currently facing with resources available and the current workload expectation of supporting 51 SACs.

Benchmark Analysis

Reviewing the structure and practices of organizations that are like another organization (benchmarking) is useful to identify new and interesting best practices and metrics that should be considered for implementation within the target organization. Optimal conducted a cursory review of a few organizations within the U.S. government to identify potential practices for USCCR to consider.

Typically, benchmarking within organizations requires an in-depth review of documentation and interviews with stakeholders to more deeply understand and properly apply the practice being reviewed. Most important, the practice to be benchmarked needs to be identified and agreed upon by stakeholders. Here are a few government organizations that may be targets for benchmarking and comparison down the road.

- Women’s Bureau within the U.S. Department of Labor (DOL) (https://www.dol.gov/wb/info_about_wb/about_wb.htm)
 - Overview: A division of DOL that does research and analysis of women’s issues in states through network of regional offices.
- United States Commission on International Religious Freedom (USCIRF) (<http://www.uscirf.gov/about-uscirf>)
 - Overview: USCIRF is an independent, bipartisan commission that makes policy recommendations to the President and Congress, but has an international instead of national scope.
- Peace Corps (<https://www.peacecorps.gov/volunteer/connect-with-a-recruiter/>)

- Overview: The Peace Corps provides around-the-world service opportunities to volunteers to assist public and civic leaders in the community with the most pressing community challenges.
 - Highlights: The Peace Corps is embarking on a transition of moving many recruiters from offices to work-at-home status, although they have a number of regional offices that serve as hubs.

In addition to government agencies, benchmarking and comparison to non-government agencies, depending on the practice, may be useful.

Recommendations

The infrastructure needed to support USCCR RPCU is fundamental to its success: management leadership, oversight mechanisms, stakeholder buy in, change agent championing, RPCU team members, funding, tool support, and communication mechanisms. Key management changes or a restructuring fundamentally effect this infrastructure and must not be considered lightly and must be reassessed and adjusted accordingly. It is important to consider the relationships among these infrastructure components as well.

The section outlines several recommendations that are focused primarily on improving the performance of the RPCU and providing savings in support of the Commission’s goals. The recommendations presented have been categorized as follow:

- Physical Infrastructure
- Staffing and Organization
- Goal-driven Decision-making with Metrics
- Communication
- Space Management

Physical Infrastructure

Optimal recommends that USCCR makes a change in its current structure of its physical offices to reduce infrastructure costs associated with rent. Specifically, Optimal places an emphasis on teleworking in its recommendation to USCCR on how to restructure its physical offices. The U.S. Office of Personnel Management defines telework as an “arrangement in which an employee regularly works at an alternate work site such as the employee’s home, a telecenter, or other location that allows him or her to accomplish work in an effective or efficient manner.” GSA highlights the benefits of teleworking as a method that can “reduce energy use, cut down on greenhouse gases, ease traffic, reduce our dependence on foreign oil, increase worker productivity, save taxpayer dollars, help persuade talented individuals to build long careers in public service, and make the country better prepared for times of emergency.”¹¹

With new technology and federal agencies and private organizations alike adopting the use of advanced telecommunications such as webinars, video conference systems, and electronic mails, teleworking has increased in recent years. In 2009, the percentage of total teleworking associates was 5.72 percent, an increase from 5.24 percent in 2008.¹² Furthermore, the number of associates

¹¹ http://www.gsa.gov/graphics/ogp/GSA_Telework.pdf

¹² United States Office of Personnel Management: Status of Telework in the Federal Government – Report to Congress, 2010.

who telework three or more days per week increased from 13,365 to 18,716 associates in 2009.¹³ Furthermore, increasing the strategic use of telework is a high priority for President Obama and Congress, as evidenced by passage of the Telework Enhancement Act of 2010.¹⁴ The President and Congress have encouraged federal agencies to expand their use of telework to reduce their real estate footprint and real estate costs.¹⁵ In June 2010, President Obama issued a memorandum directing federal agencies to generate \$3 billion in cost savings by 2012 through space consolidation and the elimination of unneeded real property, while moving toward a clean energy economy.¹⁶

Staffing and Organization

The Commission's statute mandates 51 advisory committees and the Federal Advisory Committee Act and its regulations state those committees should be assigned a DFO and provided adequate resources. USCCR currently does not comply with these laws and regulations given RPCU staffing is insufficient to continuously support 51 SACs at the levels required. Even when SAC phases of work (initiation, research, reporting) are cycled accordingly to increase the coverage of assigned DFOs to a SAC, resource gaps still exist and SACs remained uncovered with respect to a facilitator or focal point at USCCR. Hence, resourcing of the RPCU is an extremely important consideration in the future months from both a staffing and organization perspective to ensure that SACs are adequately facilitated and USCCR goals are achieved as expected.

The RO nature of the RPCU structure establishes local lines of authority, which may inherently limit the efficient support of SACs, reduce knowledge transfer among RPCU employees, and implicitly limit the span of control within the area. Additionally, ROs bring about communication challenges both within the RPCU and at USCCR headquarters, which require focused attention.

Overall, the experience and skills brought forth by the Civil Rights Analyst role are essential to performing DFO activities at the highest level possible. Reducing the number of ROs across the nation and consolidating workspaces may be logical given the consensus at the analyst level that SAC-related work can be done long distance. In addition, mechanisms need to be in place to promote communication, improve efficiency, and increase productivity at USCCR. There are several options here to consider.

- **Increase Use of Alternate Resources:** The use of alternate resources within the RPCU can help to increase USCCRs' impact, particularly on the outputs generated and value-add RPCU provides to individual SACs. Two options exist here: increasing the use of interns and establishing partner relationships with subcontractors for DFO support. USCCR has experience with both of these options since they are currently using interns in MWRO and have in the past in limited circumstances used subcontractors to assist DFOs in other ROs.

It appears that the use of interns and improvements in intern-related practices within MWRO has resulted in increased efficiencies given the SACs support coverage and the number of reports being generated. The program has effectively provided RPCU with one additional F.T.E. However, further analysis may be needed to establish more quantifiable

¹³ Ibid.

¹⁴ <http://www.gpo.gov/fdsys/pkg/BILLS-111hr1722enr/pdf/BILLS-111hr1722enr.pdf>

¹⁵ Ibid.

¹⁶ <https://www.whitehouse.gov/the-press-office/presidential-memorandum-disposing-unneeded-federal-real-estate>

metrics here given that, in the case of MWRO, the Civil Rights Analyst role is overseeing the internship program and is focused only on DFO activity, whereas in other ROs, DFOs in some cases are performing multiple roles, including Regional Director, Civil Rights Analyst, and support staff for RO administration.

Most important, intern-related best practices have been identified given MWRO experience and include (1) focusing on graduate-related programs like Masters of Social Work, (2) working with universities to become a field placement site for second-year master's students in order to identify candidates, and (3) establishing consistent work scheduling (3 days a week from October through June) that can be more easily planned for in the accomplishment of DFO support. We highly recommend that these practices be promulgated to the other centers, perhaps by a central resource that has experience with working directly with universities and setting up these types of programs.

- **Increase Civil Rights Analyst Staff:** While using alternate resources will temporarily address short-term resource issues, focus should be on increasing staff that provide skills and experience as dictated by the Civil Rights Analyst role. Additionally, adjustments to job descriptions to remove administrative titles (e.g., junior civil rights analyst, senior civil right analyst, regional director, deputy regional director) could also increase efficiencies within the RPCU, particularly when it comes to supporting SACs.
- **Focus on Subject Matter Expertise:** There appears to be recurring topics within SAC project work regardless of the region and we would expect that efficiencies can be gained by placing a focus on a thematic structure (e.g., voting rights, police and community relations, criminal justice, education) versus a regional office structure to support productivity increases and establish communities of practice that can grow or benefit from stewardship within the organization. Consider SAC assignments based on themes rather than by regions in order to capitalize on individual expertise that exists within the RPCU. Use these themes to establish knowledge experts that are responsible for maintaining communities of practices and supporting SAC projects regardless of their location.
- **Leverage Formal Team-building to Increase Cooperation:** To improve communication and cooperation for the good of USCCR goal achievement, Optimal recommends that team-building activities be formerly planned both internally, across RPCU regions, and with key personnel that work closely with RPCU personnel, including Commissioners, Special Assistants, and Commission Directorates. Structured activities that include sharing and feedback will be the catalyst toward building a shared vision for the future, as well as the start of effecting positive change in the organization that directly contributes to increases in efficiency and productivity both within the RPCU and across USCCR.
- **Refine USCCR expectations:** The mandate that 51 SACs will be supported continuously (in the short term) may need to be refined within the Commission and with Congress, given that the funding and resources required will be difficult to achieve because of the current resource allocation.

Goal-driven Decision-making and Metrics

Commission-related goals and objectives can provide a compass for organization-wide and RPCU decision-making. It is critical for the USCCR to clearly define goals and objectives, communicate these to the organization at large, and evaluate the impact of planned approaches on goals prior to decision-making. Non-explicit or continually changing goals reduce focus and cannot provide

targets or measures of success. Goals, strategies for achieving goals, and progress metrics all must be aligned to demonstrate impact and the value add of the individual changes to be implemented.

If increased RPCU efficiency and productivity is the goal, an essential first step is to determine how productivity increases will be measured and assessed prior to changes being made. Optimal recommends that USCCR establish baseline measures in order to understand the impact of changes prior to implementing them. For example, an employee survey could be used to capture measures on employee satisfaction within the existing organization and work environment. After the change is implemented, the survey instrument could be implemented again in order to assess, in a quantitative way, the impact of planned changes on accomplishing USCCR goals. Improvements in productivity and effectiveness of the overall physical infrastructure could be assessed as well. See GSA's report on The New Federal Workplace (Figure 1: Improved Collaboration, p.7) for example survey questions.

Space Management

If the decision is made to proceed with physical infrastructure changes and this entails acquiring different office spaces to downsize or close existing office space, Optimal recommends reviewing the Department of Interior Space Management Handbook¹⁷ to consider implementing several practices provided when consolidating offices, including:

- Appendix A: Standard Form to Request Space from GSA
- Appendix E: DOI Space Utilization Memorandum as a Policy
- Appendix P: Lease Closeout Checklist
- Appendix Q: Move Checklist
- Appendix R: Template for a 5-Year Space Management Plan

While these practices are DOI specific, they provide useful information to consider when managing space at USCCR.

Summary

The recommendations in this report provide a starting point to measurably demonstrate quantitative improvements in both productivity and efficiency at USCCR. We recommend the following next steps:

- Reduce real estate property costs by combining offices and offering telecommuting as an option; several scenarios are explored.
- Refine and utilize a workload assessment model to better understand the resource requirements for Designated Federal Officer (DFO) activities.
- Increase the usage of intern programs and/or contractor support to support advisory committees.
- Institute topic area SAC assignments given individual staff members' areas of expertise to increase efficiency and remove the regional office mindset.

¹⁷ https://www.doi.gov/sites/doi.gov/files/migrated/pam/programs/space_management/upload/Space-Management-Handbook.pdf

- Establish and communicate RPCU metrics for monitoring productivity and efficiency improvements.
- Invest savings in:
 - RPU staffing at the Civil Rights Analyst level.
 - Improved communication tools to support SAC facilitation.
 - Detailed benchmarking of selected practices with similar organizations.

These recommendations require prioritization and seed money that can be realized from real estate cost saving and energized by physical structure decisions given the recommendations in this report.

Appendices

Appendix A. Interview Questions

Regional Directors

1. Please state your name and regional office location.
2. How many reports were initiated by your regional office in 2015? How many final reports were produced by your regional office in 2015? How many reports were initiated and produced, respectively, in 2014?
3. How many State Advisory Committees (SACs) does your office currently support? Has this changed over the past 2–3 years? If yes, explain.
4. Given current Commission resources, how many SACs do you believe you and other Designated Federal Officers can effectively work with at any one time?
5. Please describe your typical work day. What are your typical work hours? Do you telework or telecommute? If yes, what is your typical telework/telecommute schedule?
6. What work activity do you spend most of your time on? (percentage)
7. Do you regularly collaborate or work with civil rights analysts and support staff in your office? If yes, please describe. Do you regularly collaborate or work with regional directors, civil rights analysts, or support staff in other regional offices? If yes, please describe.
8. It is important to be in the same metropolitan area or region of the country as the SACs that you are assisting? (strongly disagree, disagree, neither agree or disagree, agree, strongly agree). If agree or strongly agree, please explain.
9. Do you have any ideas on ways to better standardize Regional Office (RO) operations? If yes, describe.
10. How do certain RO tasks help contribute to the USCCR mission of receiving advice and recommendations from advisory committees?
11. What would you say are the top three (3) strengths of your regional office?
12. What would you say are the top three (3) challenges within your regional office?
13. What recommendations do you have to improve the efficiency of the USCCR overall? At your regional office?
14. If you had a magic wand and could change the organization of USCCR to make it work more efficiently without adding financial resources, what would you suggest?
15. What are you most proud of at USCCR? Both at an organizational level and individual level?

Civil Rights Analysts

1. Please state your name and regional office location.
2. How many SACs does your office currently support? Has this changed over the past 2–3 years? If yes, explain.
3. How often do the SACs meet outside of the regularly scheduled monthly meetings?
4. Given current Commission resources, how many SACs do you believe you and other Designated Federal Officers can effectively work with at any one time?
5. Please describe your typical work day. What are your typical work hours? Do you telework or telecommute? If yes, what is your typical telework/telecommute schedule?
6. Do you regularly collaborate or work with the regional director or support staff in your office? If yes, please describe. Do you regularly collaborate or work with regional

- directors, civil rights analysts, or support staff in other regional offices? If yes, please describe.
7. It is important to be in the same metropolitan area or region of the country as the SACs that you are assisting? (strongly disagree, disagree, neither agree or disagree, agree, strongly agree). If agree or strongly agree, please explain.
 8. What work activity do you spend most of your time on? (percentage)
 - a. Recruiting committee members
 - b. Conducting secondary research of civil right topics
 - c. Writing reports
 - d. Organizing meetings
 - e. Other (please describe)
 9. Hypothetical: If you have only one committee to manage, how often do you think they should meet to maintain a steady progress to complete a report?
 10. Do you have particular areas of expertise that could be used at other regions? Would you be open to being assigned to committees in areas outside of your region?
 11. Are there work tasks that could be streamlined and improved?
 12. What would you say are the top three (3) strengths of your regional office?
 13. What would you say are the top three (3) challenges within your regional office?
 14. What recommendations do you have to improve the efficiency of the USCCR overall? At your regional office?
 15. If you had a magic wand and could change the organization of USCCR to make it work more efficiently without adding financial resources, what would you suggest?
 16. What are you most proud of at USCCR? Both at an organizational level and individual level?

Support Staff

1. Please state your name and regional office location.
2. Please describe your typical work day. What are your typical work hours? Do you telework or telecommute? If yes, what is your typical telework/telecommute schedule?
3. What work activity or task do you spend most of your time on? (percentage)
4. Is the time you have available sufficient to complete your assigned tasks?
5. Do you have the training you need to complete your assigned tasks?
6. Do you regularly collaborate or work with the regional director or civil rights analysts in your office? If yes, please describe. Do you regularly collaborate or work with regional directors, civil rights analysts, or support staff in other regional offices? If yes, please describe.
7. It is important to be in the same metropolitan area or region of the country as the SACs that you are assisting? (strongly disagree, disagree, neither agree or disagree, agree, strongly agree). If agree or strongly agree, please explain.
8. What would you say are the top three (3) strengths of your regional office?
9. What would you say are the top three (3) challenges within your regional office?
10. What recommendations do you have to improve the efficiency of the USCCR overall? At your regional office?
11. If you had a magic wand and could change the organization of USCCR to make it work more efficiently without adding financial resources, what would you suggest?

12. What are you most proud of at USCCR? Both at an organizational level and individual level?

Appendix B: Interview Findings Summary

From October 3–5, 2016, interviews were conducted with RPU personnel, including Regional Directors, Civil Rights Analysts, and Administrative Assistants. The complete summary of the interview findings is provided below:

- The majority of Regional Programs Unit (RPU) employees have been employed with USCCR for decades and value the work that they do to make a difference in civil rights at both the state and local level.
- RPU employees are proud of the work they accomplish with citizens of their regions as well as the communication flow between Regional Offices (RO). They shared several examples to show their commitment to their work in the RO with the State Advisory Committees (SACs) and to the Commission, as a whole.
- RPU employees expressed concern with the communication between the ROs and Commission.
- Several other audits have been performed and past recommendations to the Commission appear to have not been addressed.
 - “Regional office programs are being singled out.”
 - RPU is an important component or “backbone” of the Commission and resources continue to be reduced at the RPU; however, similar actions do not seem to be taking place at the Commission.
- The Civil Rights Analysts and support staff widely agreed that it is **not** necessary to be co-located in the same metropolitan area or region of the country as the SAC being supported:
 - 98% of the work” required to facilitate the SAC can be accomplished remotely.
 - The SAC role is to be “the local expert,” whereas RPU is the facilitator.
- Most of the Regional Directors stressed the importance of having a regional presence in order to provide face-to-face support and enhance relationship building in that region with the SACs. This was especially important for regions that worked in close collaboration with certain SACs.
- In comparison to other organizations in both the federal and private sector, USCCR is a very top-heavy organization. Many of the employees are senior-level managers and directors.
- Current RO staffing levels have negatively impacted SAC-related performance outcomes and causes delays in completing tasks in a timely manner.
- Administrative Instruction (AI) authorizing 4-year terms versus 2-year terms for committees have been beneficial to increase efficiency and allow for continued nurturing of individual SAC committees and membership by the Designated Federal Officer (DFO).
- There are recurring themes or topic areas across SAC committees (e.g., voting rights, police and community relations, criminal justice, education). In some cases, completion times for Commission-related activities seems excessive to RPU personnel (e.g., authorization of purchases, payment of vendors, information technology-related requests, processing of SAC appointment packages).
- Training on methods, systems, and tools is usually self-taught or done for the RPUs by the Commission via conference calls.
- The method of interacting with SACs has changed dramatically over the years given the reduction of funds to support the RPU activities during that same period of time.
 - Now face-to-face meetings occur only with hearings where testimony is provided.

- Video conferencing and conference call (via ReadyTalk) is used much more extensively; however, with SACs of up to 12–14 participants video conferencing is limited to four.
- Time frame to prepare for hearings in person has changed for DFOs too.
- Current SAC appointment process is difficult since only 2 weeks is provided to allow for review and updates. In the past, pre-review was provided 60 days prior to SAC appointment period closure.
- A staff of 10 supports over 140 people (51 SACs time on average 12 members per SAC)
- There is one (1) Special Assistance or right-hand person for each commissioner. Currently, there are eight (8) part-time, (Schedule C) commissioners.
 - It seems that Special Assistants are full time. It is unclear why a part-time role (Commissioner) would need full-time support, particularly given the limited visibility on what the special assistant does.
 - Temporary services to support SAC-related activity was used to fill resource gaps and was eliminated 2 years ago.
- Limited inclusion of key personnel on important artifact updates (AI on SAC appointments and SAC Member Handbook).
- Tool support and RPU knowledge is being shared between ROs (e.g., timesheet support).
- Political appointee nature of the USCCR leadership makes long-term organizational change difficult and there is no long-term senior executive service slot.
 - Concerns expressed that USCCR keeps reinventing the wheel with each leadership change.
 - Institutional memory is not retained.
- It is also worth noting that most RPU employees have been employed with USCCR for decades and value the work that they do to make a difference in civil rights at both the state and local level.
 - “I love my job.”
 - “Get the job done because we (RPU) pull together.”
 - “We work well together (within centers) with a lot of communication.”
 - “I’m proud of the work SACs do to make a difference in the state and local areas.”

Appendix C: Workload analysis for one hypothetical SAC

Initiation Phase (Months 1–4)	Estimated Hours	Notes / Weeks	Estimate Assumptions
o Recruit committee membership	24	Once every 4 years	Assumes 2 hours per committee member (10–12 volunteers in each SAC)
o Prepare SAC appointment packages and coordinate with commissioners	40	Once every 4 years	
o Plan for and organization quarterly SACs meetings	16		Assumes 2-hour meetings in Month 1 and Month 4; prep and FACA reporting time
o Assist SACs with generating ideas for pertinent project proposals	8		
o Draft project proposals given the selected ideas and obtain approval	40		
	128	3.2	
Research Phase (Months 5–9)			
o Gather data for SAC meeting, given approved project	40		
o Plan for and organize monthly SAC project meetings	40		Assumes 2-hour meetings in Months 5–9; prep and FACA reporting time
o Report project results and respond to individual SAC members	24		Assumes 2 hours per committee member
o Prepare for and facilitate community hearings on selected project topic	40		
	144	3.6	
Report Writing Phase (Months 10–12)			
o Prepare report, given hearing results and data collected	100		Assumes 100 pages
o Coordinate with individual SAC members, as needed	12		Assumes 1 hour per committee member
o Review with SAC and USCCR general counsel and update	36		
o Plan for and organization SAC meetings every 2–3 months	16		Assumes one 2-hour meeting at Month 10 and 12; prep and FACA reporting time
	164	4.1	
Total Hours / Weeks to support SAC (1 year every phase)	436	10.9	
Total Days to support SAC (1 year every phase)	54.50		4 ¹⁸
Total Days to support 4 SACs	218.00	43.6	
Resource Availability - Days / Weeks / Hours	260.00	52	2080 ¹⁹

¹⁸ Goal: Number of SAC assigned

¹⁹ Hours per year without time-off / vacation

Appendix D: CPPM Input from USCCR

	Commission	Eastern Regional Office	Southern Regional Office	Midwest Regional Office	Central Regional Office	Rocky Mountain Regional Office	Western Regional Office
People							
Number of employees	24	2	1	3	1	2	1
Number of teleworkers	17	TBD	1	3	1	2	1
Real Estate							
Total square footage of office space	24,139	na	2,300	1,964	2,000	1,313	3,079.00
Number of work spaces	TBD	3	TBD -5	TBD - 5	TBD - 3	TBD - 4	TBD - 7
Full service lease rate/square foot	\$50.42		\$23.56	\$38.36	\$17.66	\$25.68	\$32.18
Telecommunications							
Telecommunications Services (Digital or IP Phone)	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Mobility Devices							
Second computer (laptop)							
Quantity	6						
Annual cost per unit	\$1,200.00						
Smartphone							
Quantity	7		0	2	0	0	0
Annual cost per unit	\$960.00			\$1,200.00			
Other (please describe) MIFI mobile Internet							
Quantity	4						
Annual cost per unit	\$708.00						
Lease Terms							
Annual lease amount	1,208,930	Included in HQ	50,088	65,854	32,312	30,078	70,359
Termination clause(s) (Yes or No)	YES		YES	YES	YES	YES	YES
Termination fee amount(s)	\$402,976.67		\$16,696.00	\$21,951.33	\$10,770.67	\$10,026.00	\$23,453.00
Total years in lease	10		5	7	5.5	10	5
Years remaining in lease	6		4	2	0	8	3

Appendix E. Assessment Approach

Optimal conducted an organizational assessment that focused on improvements to USCCR and its ROs. The scope of the assessment was primarily focused on physical infrastructure and staff configuration based upon literature reviews of documentation provided by USCCR (i.e., job descriptions and SAC reports), interviews with the Commission and ROs, and an analysis using the General Services Administration's (GSA) CPPM 2.0.²⁰

Optimal conducted interviews from October 3–5, 2016, with key personnel from selected regional centers, including Regional Directors, Civil Rights Analysts, and Administrative Assistants. Each interview took approximately 1 hour and was conducted via WebEx teleconference. Proposed interview questions were developed, reviewed by USCCR Commission leaders, and provided to interviewees in advance of the interviews (see Appendix A for a full list of interview questions).

In addition, the following material was reviewed by Optimal for consideration in the assessment:

- RPU Organizational Assessment Memorandum
- Civil Rights and the School-to-Prison Pipeline in Oklahoma Report
- USCCR Letter on Civil Rights and the School-to-Prison Pipeline in Oklahoma Report
- Last Best article 'All of Montana is a border town,' civil rights panel
- Completed CPPM information on Commission and ROs (see Appendix C: CPPM Input from USCCR)
- USCCR job descriptions for:
 - Supervisory Civil Rights Analyst/Regional Director
 - Civil Rights Analyst
 - Program Management Analyst
 - Secretary/Office Automation
 - Incumbent Director
- Memorandum outlining USCCR's suggested recommendations for future changes
- RPU Status Report

²⁰ <http://www.gsa.gov/portal/content/105134>