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District Complement Plans, 2017

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January 31, 2018

Re: FOIA No.: 820-2017-003037 (District Complement Plan)

Your Freedom of Information Act (FOIA) request, received on August 28, 2017, is processed. Our search began on August 29, 2017. The initial due date was extended by 10-business days to October 11, 2017. All agency records in creation as of August 29, 2017 are within the scope of EEOC's search for responsive records. The paragraph(s) checked below apply.

[X] Your request is granted in part and denied in part. Portions not released are withheld pursuant to the subsections of the FOIA indicated at the end of this letter. An attachment to this letter explains the use of these exemptions in more detail.

[X] You may contact the EEOC FOIA Public Liaison, Stephanie D. Garner, for further assistance or to discuss any aspect of your request. In addition, you may contact the Office of Government Information Services (OGIS) to inquire about the FOIA mediation services they offer.

The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, email at ogis@nara.gov; telephone at (202) 741-5770; toll free 1-877-684-6448; or facsimile at (202)741-5769.

The contact information for the FOIA Public Liaison: (see contact information in the above letterhead or under signature line).

[X] If you are not satisfied with the response to this request, you may administratively appeal in writing. Your appeal must be postmarked or electronically transmitted in 90 days from receipt of this letter to the Office of Legal Counsel, FOIA Programs, Equal Employment Opportunity Commission, 131 M Street, NE, 5NW02E, Washington, D.C. 20507, or by fax to (202) 653-6034, or by email to FOIA@eeoc.gov, or online at the following public access link (PAL): <https://publicportalfoiapal.eeoc.gov/palMain.aspx>. Your appeal will be governed by 29 C.F.R. § 1610.11.

Re: FOIA No.: 820-2017-003037

[X] See the attached Comments page for further information.

Sincerely,

/s/Sdgarner

Stephanie D. Garner
Assistant Legal Counsel
Phone: (202) 663-4634
FOIA@eeoc.gov

Applicable Sections of the Freedom of Information Act, 5 U.S.C. § 552(b):

Exemption(s) Used:

(b)(5) and (b)(7)(E)

Exemption (b)(5) permits withholding documents that reflect the analyses and recommendations of EEOC personnel generated for the purpose of advising the agency of possible action. This exemption protects the agency's deliberative process, and allows nondisclosure of "inter-agency or intra-agency memorandums or letters which would not be available to a party other than an agency in litigation with the agency." 5 U.S.C. § 552(b)(5). The exemption covers internal communications that are deliberative in nature. *National Labor Relations Board v. Sears, Roebuck & Co.*, 421 U.S. 132 (1975); *Hinckley v. United States*, 140 F.3d 277 (D.C. Cir. 1998); *Mace v. EEOC*, 37 F.Supp. 2d 1144 (E.D. Mo. 1999). The purpose of the deliberative process privilege is to "allow agencies freely to explore alternative avenues of action and to engage in internal debates without fear of public scrutiny." *Missouri ex. rel. Shorr v. United States Corps of Eng'rs.*, 147 F.3d 708, 710 (8th Cir. 1998).

DOCUMENTS WITHHELD PURSUANT TO THE FIFTH EXEMPTION TO THE FOIA

Memo (1 page): 6 lines were redacted in relation to focus areas for the field offices.

Atlanta District Office (5 pages): 9 lines were redacted in its District Complement Plan;

Birmingham District Office (4 pages): 24 lines were redacted in its District Complement Plan;

Charlotte District Office (4 pages): 9 lines were redacted its District Complement Plan;

Dallas District Office (4 pages): 5 lines were redacted in its District Complement Plan;

Houston District Office (4 pages): 4 lines were redacted in its District Complement Plan;

Los Angeles District office (5 pages): 22 lines were redacted in its District Complement Plan;

Memphis District Office (3 pages): 4 lines were redacted in its District Complement Plan;

Miami District Office (10 pages): 122 lines were redacted in its District Complement Plan;

New York District Office (3 pages): 12 lines were redacted in its District Complement Plan;

Re: FOIA No.: 820-2017-003037

Philadelphia District Office (4 pages): 10 lines were redacted in its District Complement Plan;

Phoenix District Office (5 pages): 18 lines were redacted in its District Complement Plan;

Exemption (b)(7)(E) to the Freedom of Information Act (FOIA), 5 U.S.C. § 552(b)(7)(E) (2016), as amended by the FOIA Improvement Act of 2016, authorizes the Commission to withhold: law enforcement information that “ would disclose techniques and procedures for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law.”

DOCUMENTS WITHHELD PURSUANT TO THE SEVENTH EXEMPTION TO THE FOIA

Atlanta District Office (5 pages): 81 lines were redacted in its District Complement Plan;

Birmingham District Office (4 pages): 70 lines were redacted in its District Complement Plan;

Charlotte District Office (4 pages): 92 lines were redacted in its District Complement Plan;

Chicago District Office (4 pages): 94 lines were redacted from its District Complement Plan;

Dallas District Office (4 pages): 96 lines were redacted from its District Complement Plan;

Houston District Office (4 pages): 94 lines were redacted from its District Complement Plan;

Indianapolis District Office (5 pages): 115 lines were redacted from its District Complement Plan;

Los Angeles District office (5 pages): 115 lines were redacted from its District Complement Plan;

Memphis District Office (3 pages): 80 lines were redacted from its District Complement Plan;

Miami District Office (10 pages): 175 lines were redacted from its District Complement Plan;

New York District Office (3 pages): 81 lines were redacted from its District Complement Plan;

Philadelphia District Office (4 pages): 90 lines were redacted from its District Complement Plan;

Phoenix District Office (5 pages): 97 lines were redacted from its District Complement Plan;

San Francisco District Office (4 pages): 123 lines were redacted from its District Complement Plan;

Re: FOIA No.: 820-2017-003037

St. Louis District Office (5 pages): 125 lines were redacted from its District Complement Plan; and

Washington Field Office (4 pages): 102 lines were redacted from its District Complement Plan.

Comments

This is in response to your Freedom of Information Act (FOIA) request. You request a copy the District Complement Plan for each EEOC District Office. Your request is granted in part and denied in part.

Information withheld under Exemption (b)(7)(E) cited above includes technical instructions for investigators on investigatory best practices, derived from years of investigative experience and resulting expertise acquired by the agency, such as: what types of information to look for and how to obtain it, how to recognize systemic and class issues, procedures to be used in building a class, and negotiation and conciliation strategy. If these techniques and procedures became public, respondents would be able to use their newfound knowledge of our investigative strategies and tactics to thwart our investigations and/or prevent us from obtaining the information needed in order to determine whether a violation has occurred.

Attached for your review is the District Complement Plan (75 pages) as requested.

For a full description of the exemption codes used please find them at the following URL: <https://publicportalfoiapa.eeoc.gov/palMain.aspx>

This response was prepared by Tracy L. Smalls, Government Information Specialist, who may be reached at 202-663-4331.

District Complement Plans Updated January 2017

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Approved by the Chair
January 19, 2017



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

Office of the Chair

January 19, 2017

TO: James Lee, Deputy General Counsel
Nicholas Inzeo, Office of Field Programs Director
District Directors
Regional Attorneys

FROM: Jenny R. Yang, Chair

A handwritten signature in black ink, appearing to read "J.R. Yang", is written over the printed name.

SUBJECT: Approval of Updated District Complement Plans

I am pleased to approve the attached District Complement Plans (DCPs) to support implementation of the Commission's Strategic Enforcement Plan (SEP) for Fiscal Years 2017-2021. Thank you for your work in updating these plans, and please convey my appreciation to all of the staff who contributed to the development of the plans.

The updated SEP and DCPs are critical to ensure the agency focuses its efforts on those activities likely to have strategic impact in advancing equal opportunity and freedom from discrimination in the workplace. The new SEP adds a priority focused on Strategic Impact and also emphasizes the importance of integrating the SEP and PCHP to achieve this objective. Clearly defined substantive area priorities allow the agency to consistently allocate resources where government enforcement is needed and impactful. Thus, the new SEP revised four of the priority areas (Vulnerable Immigrant and Migrant Workers, Selected Emerging and Developing Issues, Equal Pay Protections for All Workers, and Access to the Legal System) (b)(5)

(b)(5) for EEOC's efforts.

Your leadership in implementing the SEP and DCPs is critical to the development of cases with strategic impact and to the efficient management of the charge workload. The Commission is relying on you and your management teams to ensure that staff understand how the updated SEP and DCPs work to achieve both objectives. For example, the national focus of the SEP is on vulnerable immigrant and migrant workers. (b)(5)

(b)(5)

cc: Chai R. Feldblum, Commissioner
Victoria A. Lipnic, Commissioner
Charlotte A. Burrows, Commissioner



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Atlanta District Office

ATLANTA DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Atlanta District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan (DCP). This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

(b)(7)(E)

Strategies:

(b)(7)(E)

Focus Areas:

(b)(5)

Protecting Vulnerable Workers, including Immigrant and Migrant Workers, and Underserved Communities from Discrimination

Strategies:

(b)(7)(E)

(b)(7)(E)

Focus Areas:

(b)(5)

Addressing Emerging and Developing Issues

Issues and Strategies:

(b)(7)(E)

Focus Areas:

(b)(5)

Ensuring Equal Pay Protections for All Workers

Issues and Strategies:

(b)(7)(E)

(b)(7)(E)

Focus Areas:

(b)(5)

Preserving Access to the Legal System

Issues and Strategies:

(b)(7)(E)

Focus Areas:

(b)(5)

Preventing Harassment Through Systemic Enforcement and Targeted Outreach

Issues and Strategies:

(b)(7)(E)

(b)(7)(E)

Focus Areas:

(b)(5)

(b)(5)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Atlanta District Office priorities are defined based on a review of employment practices of major industries which have a substantial impact on Georgia's and South Carolina's respective economies.

Other District Enforcement Priorities:

(b)(5)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

(b)(7)(E)

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BIRMINGHAM DISTRICT COMPLEMENT PLAN
TO STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Birmingham District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES:

A. NATIONAL PRIORITIES

1. Eliminating Barriers in Recruitment and Hiring

(b)(5)

2. Protecting Vulnerable Workers, including Immigrant and Migrant Workers, and Underserved Communities from Discrimination

(b)(5)

3. Addressing Selected Emerging and Developing Issues.

(b)(5)

4. Ensuring Equal Pay for All Workers

(b)(5)

5. Preserving Access to the Legal System.

(b)(5)

6. Preventing Systemic Harassment

(b)(5)

B. ENFORCEMENT STRATEGIES TO IMPLEMENT NATIONAL PRIORITIES

(b)(7)(E)

C. POTENTIAL FOCUS AREAS FOR SYSTEMIC INVESTIGATION AND LITIGATION

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

- A. **Input and advice was solicited form key stakeholders in the District.** Overwhelmingly, the issues identified by stakeholders mirror the result of charges filed throughout the District. Throughout the Birmingham District, the key issues presented are:

(b)(7)(E)

- B. **Enforcement strategies for implementation of district enforcement priorities**

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

The Birmingham District reaffirms its commitment to the joint responsibility shared by legal and enforcement staff for the advancement of the SEP and DCP priorities in the District.

Collaborative decision-making on priority cases is an essential component of the effective implementation of this DCP and the SEP. The Birmingham District will ensure the involvement of both enforcement and legal staff in the identification and development of meritorious charges under the SEP and DCP.

(b)(7)(E)

(b)(7)(E)

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U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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Charlotte District Complement Plan
To The
National Strategic Enforcement Plan
Updated January 2017

INTRODUCTION : Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP) the Charlotte District Office submits to the Office of the Chair, through the Acting General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan (DCP). This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

Section 1: District Implementation of SEP National Priorities

The Charlotte District embraces each of the SEP National priority areas and will use those priorities to drive the prioritization and allocation of resources to accomplish Agency and District goals. Those priorities are:

(b)(7)(E)

Section II: Additional District Enforcement Strategies and Priorities

The Charlotte District Office embraces each of the national SEP priorities and will insure our local Enforcement /Legal work culture envelopes these priorities. Local systems and processes will insure priority is given to those charges that raise SEP/DCP issues.

In addition to the SEP priority issues, the District Complement Plan (DCP) priorities are:

(b)(5)

Consistent with the Legal Enforcement Interaction Plan, the following processes will be used to assure consistent, timely, efficient development of charges raising SEP or DCP issues.

(b)(7)(E)

(b)(7)(E)

- e. CTDO will review the national SEP and local DCP priorities with staff and conduct training on the identification of priority issues. CTDO will develop issue appropriate interview guides to assist in the early identification and development of charges that may reflect discriminatory policies or practices.
- f. The Charlotte District is committed to using Outreach and Education tools to expand the audience impacted by SEP and DCP priorities. We will also, whenever possible, partner with other entities to identify, target and redress discriminatory practices.

(b)(7)(E)

(b)(7)(E)

Section III: Strategies for Enforcement – Legal Collaboration

(b)(7)(E)



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Mediation Fax: (312) 869-8060

**CHICAGO DISTRICT COMPLEMENT PLAN
TO THE
EEOC'S STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION:

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Chicago District submits to the Office of the Chair, through the Office of the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

Each SEP priority and, where identified, DCP priority issue is detailed below. Anticipated strategies to eradicate discrimination in each priority area are described.

1. ELIMINATING BARRIERS IN RECRUITMENT AND HIRING

(b)(7)(E)

**2. PROTECTING VULNERABLE WORKERS, INCLUDING IMMIGRANT AND
MIGRANT WORKERS, AND UNDERSERVED COMMUNITIES FROM
DISCRIMINATION**

(b)(7)(E)

3. ADDRESSING SELECTED EMERGING AND DEVELOPING ISSUES

(b)(7)(E)

4. ENSURING EQUAL PAY PROTECTIONS FOR ALL WORKERS

(b)(7)(E)

5. PRESERVING ACCESS TO THE LEGAL SYSTEM

(b)(7)(E)

6. PREVENTING SYSTEMIC HARASSMENT

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Chicago District intends to prioritize the following issues:

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

(b)(7)(E)

(b)(7)(E)

(b)(7)(E)

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Dallas District Office
San Antonio Field Office
El Paso Area Office

**DALLAS DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION: Pursuant to the Commission's 5-year Strategic Enforcement Plan for FY 2017-2021 (SEP), the Dallas District submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT ENFORCEMENT STRATEGIES FOR NATIONAL PRIORITIES

The SEP identifies the following as national priorities. EEOC's national priorities will be emphasized by the Dallas District Office in the full complement of its efforts through outreach, investigation, alternative dispute resolution and/or litigation

- Eliminating barriers in recruitment and hiring
- Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities from Discrimination
- Addressing Selected Emerging and Developing Issues:

(b)(7)(E)

- Ensuring Equal Pay Protections for All Workers
- Preserving Access to the Legal System

(b)(7)(E)

(b)(6)

As part of the District's efforts to implement the above SEP priorities, the Dallas District intends to do the following:

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

(b)(5)

(b)(7)(E)

(b)(5)

(b)(7)(E)

- ***Discrimination against Individuals with intellectual disabilities***

(b)(7)(E)

- ***Discrimination against veterans with mental or physical impairments.***

(b)(7)(E)

- ***Discrimination identified through interagency collaboration in particular industries.***

(b)(7)(E)

SECTION 3: STRATEGIES FOR ENFORCEMENT-LEGAL COLLABORATION

(b)(7)(E)

(b)(7)(E)

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HOUSTON DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION

Pursuant to the Commission's Strategic Enforcement Plan for 2017-2021 (SEP), the Houston District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

The Houston District will prioritize all National SEP Priorities:

A. National Priorities under the SEP

(b)(7)(E)

(b)(7)(E)

B. Implementation Strategies

Houston District strategies are applicable to each of the six SEP national priorities.

(b)(7)(E)

C. Enforcement Strategy and Outreach Tools

HDO will employ the following strategies and tools:

(b)(7)(E)

D. Systemic Investigation and Litigation Focus Areas:

(b)(5)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

A. Local Priorities

(b)(7)(E)

B. Strategies for Implementing Local Priorities

i. Implementation Strategy

(b)(7)(E)

ii. Enforcement Strategy and Outreach Tools

(b)(7)(E)

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

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**INDIANAPOLIS DISTRICT COMPLEMENT PLAN TO THE
STRATEGIC ENFORCEMENT PLAN**
Updated January 2017

INTRODUCTION

Pursuant to the Commission's Strategic Enforcement Plan (SEP) the Indianapolis District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

1. Eliminating barriers in recruitment & hiring:

(b)(7)(E)

2. Protecting vulnerable immigrant and migrant workers:

(b)(7)(E)

3. Addressing selected emerging and developing issues:

(b)(7)(E)

4. Ensuring equal pay for all workers:

(b)(7)(E)

5. Preserving access to the legal system:

(b)(7)(E)

6. Preventing systemic harassment:

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

A. PRIORITIES

(b)(7)(E)

(b)(7)(E)

B. STRATEGIES

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

(b)(7)(E)

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**LOS ANGELES DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Los Angeles District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement priorities and identifies additional District enforcement priorities and strategies.

Section 1: Strategies to Implement SEP National Priorities

1. Eliminating Barriers in Recruitment and Hiring

A. Strategies for Implementation

(b)(7)(E)

B. Focus areas

(b)(5)

2. Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities from Discrimination

A. Strategies for Implementation

(b)(7)(E)

(b)(7)(E)

B. Focus areas

(b)(5)

3. Addressing Selected Emerging and Developing Issues

A. Strategies for Implementation

(b)(7)(E)

B. Focus Areas

(b)(5)

4. Enforcing Equal Pay Protections for All Workers

A. Strategies for Implementation

(b)(7)(E)

(b)(7)(E)

B. Focus areas

(b)(5)

5. Preserving Access to the Legal System

A. Strategies for Implementation

(b)(7)(E)

B. Focus areas

(b)(5)

6. Preventing Systemic Harassment

A. Strategies for Implementation

(b)(7)(E)

Section 2: Additional District Enforcement Priorities

In addition to the national priorities, the LADO identifies these additional enforcement priorities

(b)(5)

(b)(7)(E)

Section 3: Strategies for Collaborative Legal and Enforcement Efforts

(b)(7)(E)

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MEMPHIS DISTRICT COMPLEMENT PLAN
TO THE FY 2017-2021 STRATEGIC ENFORCEMENT PLAN
Updated January 2017

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Memphis District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

Section 1: District Implementation of SEP National Priorities

Overall approach to implementation -
cases

(b)(5)

(b)(7)(E)

Strategies in Support of Specific National Priorities

Background: The revised SEP National Priorities will present different opportunities for enforcement initiatives in the Memphis District. Again we expect to implement national priorities

(b)(5)

Priority 1- Eliminating Barriers in Recruitment/Hiring:

(b)(7)(E)

Priority 2 – Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities

(b)(7)(E)

(b)(7)(E)

Priority 3 – Emerging Issues

(b)(7)(E)

Priority 4 – Enforcing Equal Pay Protections for All Workers

(b)(7)(E)

Priority 5 – Preserving Access to Legal System

(b)(7)(E)

Priority 6 – Preventing Systemic Harassment

(b)(7)(E)

Section 2: Additional District Enforcement Priorities

(b)(7)(E)

(b)(7)(E)

Both enforcement and outreach strategies will be used to address these priorities.

Section 3: Strategies for Collaboration

The Memphis District reaffirms its commitment to the joint responsibility shared by legal and enforcement staff for the advancement of the SEP and DCP priorities in the District.

Collaborative decision-making on priority cases is an essential component of the effective implementation of this DCP and the SEP.

(b)(5)

(b)(5)

(b)(7)(E)



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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MIAMI DISTRICT COMPLEMENT PLAN
TO THE EEOC NATIONAL STRATEGIC ENFORCEMENT PLAN FY 2017-2021

Updated January 2017

INTRODUCTION

Pursuant to the U.S. Equal Employment Opportunity Commission's Strategic Enforcement Plan (the "SEP") for FY 2017 – 2021, the Miami District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan ("DCP"). This DCP sets forth specific Miami District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

This DCP updates and supersedes the Miami DCP put into effect in November 2013 which served as a DCP to the national SEP for FY 2012-2016. The significant changes in the priorities of the national SEP for FY 2017-2021 are incorporated in each section.

SECTION I:
DISTRICT IMPLEMENTATION OF SEP 2017-2021 NATIONAL PRIORITIES

1. ELIMINATING BARRIERS IN RECRUITMENT AND HIRING

A. Issues:

(b)(7)(E)

(b)(7)(E)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

2. **PROTECTING VULNERABLE WORKERS, INCLUDING IMMIGRANT AND MIGRANT WORKERS, AND UNDERSERVED COMMUNITIES FROM DISCRIMINATION**

A. **Issues:**

(b)(5)

B. **Enforcement Strategies:**

(b)(7)(E)

C. **Focus Areas:**

(b)(5)

(b)(5)

3. **Addressing Selected Emerging and Developing Issues**

A. **Issues:**

(b)(7)(E)

B. **Enforcement Strategies:**

(b)(7)(E)

(b)(7)(E)

C. Focus Areas:

(b)(5)

4. Ensuring Equal Pay Protections for All Workers

A. Issues:

(b)(5)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

5. Preserving Access to the Legal System

A. Issues:

(b)(5)

(b)(5)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

6. Preventing Systemic Harassment

A. Issues:

(b)(5)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

SECTION II:
ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Miami District encompasses all of Florida (with the exception of 11 counties in the Florida Panhandle), Puerto Rico and the U.S. Virgin Islands. The District has an extremely diverse workforce with specific issues related to the national SEP, but still unique to MDO. The following are additional MDO enforcement priorities with an explanation of how each complements the national SEP.

1. National Origin Discrimination Against Haitians

(b)(5)	
(b)(5)	(b)(7)(E)
(b)(7)(E)	

2. Egregious Sexual Harassment Against Migrant Workers

Due to its climate, many migrant farm workers relocate to Florida during the winter months to find work.

(b)(5)	
(b)(5)	
(b)(5)	(b)(7)(E)
(b)(7)(E)	

3. Employment Policies or Practices that Result in Discrimination Against Individuals on the Basis of Age.

Florida's Gulf Coast is home to a significant amount of retirees living in "over 55" communities. Many of these older individuals want to remain in the workforce, or need to work to supplement their income. Given this unique demographic,

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(b)(7)(E)

SECTION III:
STRATEGIES FOR COLLABORATION

(b)(7)(E)

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**NEW YORK DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the New York District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, the updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

A. SEP Issue Priorities

(b)(7)(E)

(b)(7)(E)

B. Strategies

(b)(7)(E)

C. Focus areas for investigation and litigation

(b)(5)

(b)(5)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

A. Issues

(b)(5)

B. Enforcement strategies and potential/ongoing focus areas for priorities as a group

(b)(7)(E)

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)



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**PHILADELPHIA DISTRICT COMPLEMENT PLAN
TO THE STRATEGIC ENFORCEMENT PLAN
UPDATED JANUARY 2017**

Introduction

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Philadelphia District Office submits to the Office of the Chair, through the General Counsel and the Director of the Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identified District enforcement priorities and strategies.

Section 1: District Implementation of SEP National Priorities

(1) Eliminating barriers in recruitment and hiring:

A. Issues

(b)(5)

B. Strategies

(b)(7)(E)

(2) Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities:

A. Issues

(b)(5)

B. Strategies

(b)(7)(E)

(3) Addressing emerging and developing issues:

A. Issues

(b)(5)

B. Strategies

(b)(7)(E)

(4) Enforcing equal pay protections for all workers:

(b)(7)(E)

(b)(7)(E)

- (5) Preserving access to the legal system -- Significant or Severe Retaliation, and Limiting EEOC's Access to Evidence during the Investigation:

(b)(7)(E)

- (6) Preventing systemic harassment

(b)(7)(E)

Section 2: Additional District Enforcement Priorities

The Philadelphia District will continue to carry out the Commission's commitment to a robust systemic program as set forth in both the Strategic Plan and SEP. In addition to the systemic issues raised in the SEP, the District will focus on systemic cases involving:

(b)(7)(E)

In addition, PDO general enforcement priorities emphasize:

(b)(7)(E)

Enforcement strategies include:

(b)(7)(E)

Section 3: Strategies for Collaboration

(b)(7)(E)



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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PHOENIX DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Phoenix District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, the Updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement/litigation priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

The Phoenix District will begin its implementation of the SEP and the Updated District Complement Plan

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(b)(5)

(b)(5)

An evaluation of the results of this additional line of review will be conducted at the end of the fiscal year.

Eliminating Barriers in Recruitment and Hiring:

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(b)(7)(E)

Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities from Discrimination:

(b)(7)(E)

Addressing Selected Emerging and Developing Issues:

(b)(5)

(b)(5)

Ensuring Equal Pay Protections for All Workers:

(b)(7)(E)

Preserving Access to the Legal System:

(b)(7)(E)

Preventing Systemic Harassment:

(b)(7)(E)

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

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San Francisco District Complement Plan
To the Strategic Enforcement Plan
FY 2017-2021

Introduction:

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the San Francisco District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

Section 1: District Enforcement Strategies for National Priorities

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**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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**ST. LOUIS DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the St. Louis District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan (DCP). The DCP sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

**SECTION 1
DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES**

Strategies: All National Priorities

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(b)(7)(E)

National Priority (1)
Eliminating Barriers in Recruitment and Hiring

(b)(7)(E)

National Priority (2)
**Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and
Underserved Communities from Discrimination**

(b)(7)(E)

(b)(7)(E)

National Priority (3)
Addressing Selected Emerging and Developing Issues

(b)(7)(E)

National Priority (4)
Enforcing Equal Pay Protections for All Workers

(b)(7)(E)

National Priority (5)
Preserving Access to the Legal System

(b)(7)(E)

**National Priority (6)
Preventing Systemic Harassment**

(b)(7)(E)

**SECTION 2
ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES**

The District designates the following as additional enforcement priorities:

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**SECTION 3
STRATEGIES FOR COLLABORATION**

(b)(7)(E)

(b)(7)(E)

FOR INTER



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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WASHINGTON FIELD OFFICE DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Washington Field Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

The Washington Field Office (WFO) intends to implement a number of strategies to address the national Strategic Enforcement Plan priorities. As a small office, we recognize that we cannot achieve all of the priorities. However, we will work diligently to address the priorities through a combination of enforcement and outreach.

The following strategies apply across the SEP priorities:

(b)(7)(E)

WFO will focus on the following strategies tailored to the SEP national priorities:

(b)(7)(E)

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Washington Field Office identifies the following as additional local priorities:

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

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(b)(7)(E)

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District Complement Plans Updated January 2017

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Approved by the Chair
January 19, 2017



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

Office of the Chair

January 19, 2017

TO: James Lee, Deputy General Counsel
Nicholas Inzeo, Office of Field Programs Director
District Directors
Regional Attorneys

FROM: Jenny R. Yang, Chair

A handwritten signature in black ink, appearing to read "J.R. Yang", is written over the printed name.

SUBJECT: Approval of Updated District Complement Plans

I am pleased to approve the attached District Complement Plans (DCPs) to support implementation of the Commission's Strategic Enforcement Plan (SEP) for Fiscal Years 2017-2021. Thank you for your work in updating these plans, and please convey my appreciation to all of the staff who contributed to the development of the plans.

The updated SEP and DCPs are critical to ensure the agency focuses its efforts on those activities likely to have strategic impact in advancing equal opportunity and freedom from discrimination in the workplace. The new SEP adds a priority focused on Strategic Impact and also emphasizes the importance of integrating the SEP and PCHP to achieve this objective. Clearly defined substantive area priorities allow the agency to consistently allocate resources where government enforcement is needed and impactful. Thus, the new SEP revised four of the priority areas (Vulnerable Immigrant and Migrant Workers, Selected Emerging and Developing Issues, Equal Pay Protections for All Workers, and Access to the Legal System) (b)(5)

(b)(5)

for EEOC's efforts.

Your leadership in implementing the SEP and DCPs is critical to the development of cases with strategic impact and to the efficient management of the charge workload. The Commission is relying on you and your management teams to ensure that staff understand how the updated SEP and DCPs work to achieve both objectives. For example, the national focus of the SEP is on vulnerable immigrant and migrant workers. (b)(5)

(b)(5)

cc: Chai R. Feldblum, Commissioner
Victoria A. Lipnic, Commissioner
Charlotte A. Burrows, Commissioner



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Atlanta District Office

ATLANTA DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Atlanta District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan (DCP). This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

(b)(7)(E)

Strategies:

(b)(7)(E)

Focus Areas:

(b)(5)

Protecting Vulnerable Workers, including Immigrant and Migrant Workers, and Underserved Communities from Discrimination

Strategies:

(b)(7)(E)

(b)(7)(E)

Focus Areas:

(b)(5)

Addressing Emerging and Developing Issues

Issues and Strategies:

(b)(7)(E)

Focus Areas:

(b)(5)

Ensuring Equal Pay Protections for All Workers

Issues and Strategies:

(b)(7)(E)

(b)(7)(E)

Focus Areas:

(b)(5)

Preserving Access to the Legal System

Issues and Strategies:

(b)(7)(E)

Focus Areas:

(b)(5)

Preventing Harassment Through Systemic Enforcement and Targeted Outreach

Issues and Strategies:

(b)(7)(E)

(b)(7)(E)

Focus Areas:

(b)(5)

(b)(5)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Atlanta District Office priorities are defined based on a review of employment practices of major industries which have a substantial impact on Georgia's and South Carolina's respective economies.

Other District Enforcement Priorities:

(b)(5)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

(b)(7)(E)

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BIRMINGHAM DISTRICT COMPLEMENT PLAN
TO STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Birmingham District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES:

A. NATIONAL PRIORITIES

1. Eliminating Barriers in Recruitment and Hiring

(b)(5)

2. Protecting Vulnerable Workers, including Immigrant and Migrant Workers, and Underserved Communities from Discrimination

(b)(5)

3. Addressing Selected Emerging and Developing Issues.

(b)(5)

4. Ensuring Equal Pay for All Workers

(b)(5)

5. Preserving Access to the Legal System.

(b)(5)

6. Preventing Systemic Harassment

(b)(5)

B. ENFORCEMENT STRATEGIES TO IMPLEMENT NATIONAL PRIORITIES

(b)(7)(E)

C. POTENTIAL FOCUS AREAS FOR SYSTEMIC INVESTIGATION AND LITIGATION

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

- A. **Input and advice was solicited form key stakeholders in the District.** Overwhelmingly, the issues identified by stakeholders mirror the result of charges filed throughout the District. Throughout the Birmingham District, the key issues presented are:

(b)(7)(E)

- B. **Enforcement strategies for implementation of district enforcement priorities**

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

The Birmingham District reaffirms its commitment to the joint responsibility shared by legal and enforcement staff for the advancement of the SEP and DCP priorities in the District.

Collaborative decision-making on priority cases is an essential component of the effective implementation of this DCP and the SEP. The Birmingham District will ensure the involvement of both enforcement and legal staff in the identification and development of meritorious charges under the SEP and DCP.

(b)(7)(E)

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U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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Charlotte District Complement Plan
To The
National Strategic Enforcement Plan
Updated January 2017

INTRODUCTION : Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP) the Charlotte District Office submits to the Office of the Chair, through the Acting General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan (DCP). This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

Section 1: District Implementation of SEP National Priorities

The Charlotte District embraces each of the SEP National priority areas and will use those priorities to drive the prioritization and allocation of resources to accomplish Agency and District goals. Those priorities are:

(b)(7)(E)

Section II: Additional District Enforcement Strategies and Priorities

The Charlotte District Office embraces each of the national SEP priorities and will insure our local Enforcement /Legal work culture envelopes these priorities. Local systems and processes will insure priority is given to those charges that raise SEP/DCP issues.

In addition to the SEP priority issues, the District Complement Plan (DCP) priorities are:

(b)(5)

Consistent with the Legal Enforcement Interaction Plan, the following processes will be used to assure consistent, timely, efficient development of charges raising SEP or DCP issues.

(b)(7)(E)

(b)(7)(E)

- e. CTDO will review the national SEP and local DCP priorities with staff and conduct training on the identification of priority issues. CTDO will develop issue appropriate interview guides to assist in the early identification and development of charges that may reflect discriminatory policies or practices.
- f. The Charlotte District is committed to using Outreach and Education tools to expand the audience impacted by SEP and DCP priorities. We will also, whenever possible, partner with other entities to identify, target and redress discriminatory practices.

(b)(7)(E)

(b)(7)(E)

Section III: Strategies for Enforcement – Legal Collaboration

(b)(7)(E)



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Legal Fax: (312) 869-8124
Mediation Fax: (312) 869-8060

**CHICAGO DISTRICT COMPLEMENT PLAN
TO THE
EEOC'S STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION:

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Chicago District submits to the Office of the Chair, through the Office of the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

Each SEP priority and, where identified, DCP priority issue is detailed below. Anticipated strategies to eradicate discrimination in each priority area are described.

1. ELIMINATING BARRIERS IN RECRUITMENT AND HIRING

(b)(7)(E)

**2. PROTECTING VULNERABLE WORKERS, INCLUDING IMMIGRANT AND
MIGRANT WORKERS, AND UNDERSERVED COMMUNITIES FROM
DISCRIMINATION**

(b)(7)(E)

3. ADDRESSING SELECTED EMERGING AND DEVELOPING ISSUES

(b)(7)(E)

4. ENSURING EQUAL PAY PROTECTIONS FOR ALL WORKERS

(b)(7)(E)

5. PRESERVING ACCESS TO THE LEGAL SYSTEM

(b)(7)(E)

6. PREVENTING SYSTEMIC HARASSMENT

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Chicago District intends to prioritize the following issues:

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SECTION 3: STRATEGIES FOR COLLABORATION

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(b)(7)(E)

(b)(7)(E)

(b)(7)(E)

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Dallas District Office
San Antonio Field Office
El Paso Area Office

**DALLAS DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION: Pursuant to the Commission's 5-year Strategic Enforcement Plan for FY 2017-2021 (SEP), the Dallas District submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT ENFORCEMENT STRATEGIES FOR NATIONAL PRIORITIES

The SEP identifies the following as national priorities. EEOC's national priorities will be emphasized by the Dallas District Office in the full complement of its efforts through outreach, investigation, alternative dispute resolution and/or litigation

- Eliminating barriers in recruitment and hiring
- Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities from Discrimination
- Addressing Selected Emerging and Developing Issues:

(b)(7)(E)

- Ensuring Equal Pay Protections for All Workers
- Preserving Access to the Legal System

(b)(7)(E)

(b)(6)

As part of the District's efforts to implement the above SEP priorities, the Dallas District intends to do the following:

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SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

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- ***Discrimination against Individuals with intellectual disabilities***

(b)(7)(E)

- ***Discrimination against veterans with mental or physical impairments.***

(b)(7)(E)

- ***Discrimination identified through interagency collaboration in particular industries.***

(b)(7)(E)

SECTION 3: STRATEGIES FOR ENFORCEMENT-LEGAL COLLABORATION

(b)(7)(E)

(b)(7)(E)

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HOUSTON DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION

Pursuant to the Commission's Strategic Enforcement Plan for 2017-2021 (SEP), the Houston District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

The Houston District will prioritize all National SEP Priorities:

A. National Priorities under the SEP

(b)(7)(E)

(b)(7)(E)

B. Implementation Strategies

Houston District strategies are applicable to each of the six SEP national priorities.

(b)(7)(E)

C. Enforcement Strategy and Outreach Tools

HDO will employ the following strategies and tools:

(b)(7)(E)

D. Systemic Investigation and Litigation Focus Areas:

(b)(5)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

A. Local Priorities

(b)(7)(E)

B. Strategies for Implementing Local Priorities

i. Implementation Strategy

(b)(7)(E)

ii. Enforcement Strategy and Outreach Tools

(b)(7)(E)

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

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**INDIANAPOLIS DISTRICT COMPLEMENT PLAN TO THE
STRATEGIC ENFORCEMENT PLAN**
Updated January 2017

INTRODUCTION

Pursuant to the Commission's Strategic Enforcement Plan (SEP) the Indianapolis District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

1. Eliminating barriers in recruitment & hiring:

(b)(7)(E)

2. Protecting vulnerable immigrant and migrant workers:

(b)(7)(E)

3. Addressing selected emerging and developing issues:

(b)(7)(E)

4. Ensuring equal pay for all workers:

(b)(7)(E)

5. Preserving access to the legal system:

(b)(7)(E)

6. Preventing systemic harassment:

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

A. PRIORITIES

(b)(7)(E)

(b)(7)(E)

B. STRATEGIES

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)

(b)(7)(E)

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**LOS ANGELES DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the Los Angeles District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement priorities and identifies additional District enforcement priorities and strategies.

Section 1: Strategies to Implement SEP National Priorities

1. Eliminating Barriers in Recruitment and Hiring

A. Strategies for Implementation

(b)(7)(E)

B. Focus areas

(b)(5)

2. Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities from Discrimination

A. Strategies for Implementation

(b)(7)(E)

(b)(7)(E)

B. Focus areas

(b)(5)

3. Addressing Selected Emerging and Developing Issues

A. Strategies for Implementation

(b)(7)(E)

B. Focus Areas

(b)(5)

4. Enforcing Equal Pay Protections for All Workers

A. Strategies for Implementation

(b)(7)(E)

(b)(7)(E)

B. Focus areas

(b)(5)

5. Preserving Access to the Legal System

A. Strategies for Implementation

(b)(7)(E)

B. Focus areas

(b)(5)

6. Preventing Systemic Harassment

A. Strategies for Implementation

(b)(7)(E)

Section 2: Additional District Enforcement Priorities

In addition to the national priorities, the LADO identifies these additional enforcement priorities

(b)(5)

(b)(7)(E)

Section 3: Strategies for Collaborative Legal and Enforcement Efforts

(b)(7)(E)

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MEMPHIS DISTRICT COMPLEMENT PLAN
TO THE FY 2017-2021 STRATEGIC ENFORCEMENT PLAN
Updated January 2017

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Memphis District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

Section 1: District Implementation of SEP National Priorities

Overall approach to implementation -
cases

(b)(5)

(b)(7)(E)

Strategies in Support of Specific National Priorities

Background: The revised SEP National Priorities will present different opportunities for enforcement initiatives in the Memphis District. Again we expect to implement national priorities

(b)(5)

Priority 1- Eliminating Barriers in Recruitment/Hiring:

(b)(7)(E)

Priority 2 – Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities

(b)(7)(E)

(b)(7)(E)

Priority 3 – Emerging Issues

(b)(7)(E)

Priority 4 – Enforcing Equal Pay Protections for All Workers

(b)(7)(E)

Priority 5 – Preserving Access to Legal System

(b)(7)(E)

Priority 6 – Preventing Systemic Harassment

(b)(7)(E)

Section 2: Additional District Enforcement Priorities

(b)(7)(E)

(b)(7)(E)

Both enforcement and outreach strategies will be used to address these priorities.

Section 3: Strategies for Collaboration

The Memphis District reaffirms its commitment to the joint responsibility shared by legal and enforcement staff for the advancement of the SEP and DCP priorities in the District.

Collaborative decision-making on priority cases is an essential component of the effective implementation of this DCP and the SEP.

(b)(5)

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(b)(7)(E)



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MIAMI DISTRICT COMPLEMENT PLAN
TO THE EEOC NATIONAL STRATEGIC ENFORCEMENT PLAN FY 2017-2021

Updated January 2017

INTRODUCTION

Pursuant to the U.S. Equal Employment Opportunity Commission's Strategic Enforcement Plan (the "SEP") for FY 2017 – 2021, the Miami District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan ("DCP"). This DCP sets forth specific Miami District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

This DCP updates and supersedes the Miami DCP put into effect in November 2013 which served as a DCP to the national SEP for FY 2012-2016. The significant changes in the priorities of the national SEP for FY 2017-2021 are incorporated in each section.

SECTION I:
DISTRICT IMPLEMENTATION OF SEP 2017-2021 NATIONAL PRIORITIES

1. ELIMINATING BARRIERS IN RECRUITMENT AND HIRING

A. Issues:

(b)(7)(E)

(b)(7)(E)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

2. **PROTECTING VULNERABLE WORKERS, INCLUDING IMMIGRANT AND MIGRANT WORKERS, AND UNDERSERVED COMMUNITIES FROM DISCRIMINATION**

A. **Issues:**

(b)(5)

B. **Enforcement Strategies:**

(b)(7)(E)

C. **Focus Areas:**

(b)(5)

(b)(5)

3. **Addressing Selected Emerging and Developing Issues**

A. **Issues:**

(b)(7)(E)

B. **Enforcement Strategies:**

(b)(7)(E)

(b)(7)(E)

C. Focus Areas:

(b)(5)

4. Ensuring Equal Pay Protections for All Workers

A. Issues:

(b)(5)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

5. Preserving Access to the Legal System

A. Issues:

(b)(5)

(b)(5)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

6. Preventing Systemic Harassment

A. Issues:

(b)(5)

B. Enforcement Strategies:

(b)(7)(E)

C. Focus Areas:

(b)(5)

SECTION II:
ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Miami District encompasses all of Florida (with the exception of 11 counties in the Florida Panhandle), Puerto Rico and the U.S. Virgin Islands. The District has an extremely diverse workforce with specific issues related to the national SEP, but still unique to MDO. The following are additional MDO enforcement priorities with an explanation of how each complements the national SEP.

1. National Origin Discrimination Against Haitians

(b)(5)	
(b)(5)	(b)(7)(E)
(b)(7)(E)	

2. Egregious Sexual Harassment Against Migrant Workers

Due to its climate, many migrant farm workers relocate to Florida during the winter months to find work.

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3. Employment Policies or Practices that Result in Discrimination Against Individuals on the Basis of Age.

Florida's Gulf Coast is home to a significant amount of retirees living in "over 55" communities. Many of these older individuals want to remain in the workforce, or need to work to supplement their income. Given this unique demographic,

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SECTION III:
STRATEGIES FOR COLLABORATION

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NEW YORK DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the New York District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, the updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

A. SEP Issue Priorities

(b)(7)(E)

(b)(7)(E)

B. Strategies

(b)(7)(E)

C. Focus areas for investigation and litigation

(b)(5)

(b)(5)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

A. Issues

(b)(5)

B. Enforcement strategies and potential/ongoing focus areas for priorities as a group

(b)(7)(E)

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

(b)(7)(E)



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**PHILADELPHIA DISTRICT COMPLEMENT PLAN
TO THE STRATEGIC ENFORCEMENT PLAN
UPDATED JANUARY 2017**

Introduction

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Philadelphia District Office submits to the Office of the Chair, through the General Counsel and the Director of the Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identified District enforcement priorities and strategies.

Section 1: District Implementation of SEP National Priorities

(1) Eliminating barriers in recruitment and hiring:

A. Issues

(b)(5)

B. Strategies

(b)(7)(E)

(2) Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities:

A. Issues

(b)(5)

B. Strategies

(b)(7)(E)

(3) Addressing emerging and developing issues:

A. Issues

(b)(5)

B. Strategies

(b)(7)(E)

(4) Enforcing equal pay protections for all workers:

(b)(7)(E)

(b)(7)(E)

- (5) Preserving access to the legal system -- Significant or Severe Retaliation, and Limiting EEOC's Access to Evidence during the Investigation:

(b)(7)(E)

- (6) Preventing systemic harassment

(b)(7)(E)

Section 2: Additional District Enforcement Priorities

The Philadelphia District will continue to carry out the Commission's commitment to a robust systemic program as set forth in both the Strategic Plan and SEP. In addition to the systemic issues raised in the SEP, the District will focus on systemic cases involving:

(b)(7)(E)

In addition, PDO general enforcement priorities emphasize:

(b)(7)(E)

Enforcement strategies include:

(b)(7)(E)

Section 3: Strategies for Collaboration

(b)(7)(E)



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PHOENIX DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Phoenix District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, the Updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement/litigation priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

The Phoenix District will begin its implementation of the SEP and the Updated District Complement Plan

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An evaluation of the results of this additional line of review will be conducted at the end of the fiscal year.

Eliminating Barriers in Recruitment and Hiring:

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(b)(7)(E)

Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and Underserved Communities from Discrimination:

(b)(7)(E)

Addressing Selected Emerging and Developing Issues:

(b)(5)

(b)(5)

Ensuring Equal Pay Protections for All Workers:

(b)(7)(E)

Preserving Access to the Legal System:

(b)(7)(E)

Preventing Systemic Harassment:

(b)(7)(E)

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

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SECTION 3: STRATEGIES FOR COLLABORATION

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**San Francisco District Complement Plan
To the Strategic Enforcement Plan
FY 2017-2021**

Introduction:

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the San Francisco District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies District enforcement priorities and strategies.

Section 1: District Enforcement Strategies for National Priorities

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**ST. LOUIS DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017**

INTRODUCTION

Pursuant to the Commission's Strategic Enforcement Plan for FY 2017-2021 (SEP), the St. Louis District Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan (DCP). The DCP sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

**SECTION 1
DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES**

Strategies: All National Priorities

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(b)(7)(E)

National Priority (1)
Eliminating Barriers in Recruitment and Hiring

(b)(7)(E)

National Priority (2)
**Protecting Vulnerable Workers, Including Immigrant and Migrant Workers, and
Underserved Communities from Discrimination**

(b)(7)(E)

(b)(7)(E)

National Priority (3)
Addressing Selected Emerging and Developing Issues

(b)(7)(E)

National Priority (4)
Enforcing Equal Pay Protections for All Workers

(b)(7)(E)

National Priority (5)
Preserving Access to the Legal System

(b)(7)(E)

**National Priority (6)
Preventing Systemic Harassment**

(b)(7)(E)

**SECTION 2
ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES**

The District designates the following as additional enforcement priorities:

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**SECTION 3
STRATEGIES FOR COLLABORATION**

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FOR INTER



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WASHINGTON FIELD OFFICE DISTRICT COMPLEMENT PLAN
TO THE
STRATEGIC ENFORCEMENT PLAN
Updated January 2017

INTRODUCTION: Pursuant to the Commission's Strategic Enforcement Plan for FY 2017 – 2021 (SEP), the Washington Field Office submits to the Office of the Chair, through the General Counsel and the Director of the Office of Field Programs, this updated District Complement Plan. This Plan sets forth specific District enforcement strategies to implement the SEP national priorities and identifies additional District enforcement priorities and strategies.

SECTION 1: DISTRICT IMPLEMENTATION OF SEP NATIONAL PRIORITIES

The Washington Field Office (WFO) intends to implement a number of strategies to address the national Strategic Enforcement Plan priorities. As a small office, we recognize that we cannot achieve all of the priorities. However, we will work diligently to address the priorities through a combination of enforcement and outreach.

The following strategies apply across the SEP priorities:

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WFO will focus on the following strategies tailored to the SEP national priorities:

(b)(7)(E)

(b)(7)(E)

SECTION 2: ADDITIONAL DISTRICT ENFORCEMENT PRIORITIES

The Washington Field Office identifies the following as additional local priorities:

(b)(7)(E)

SECTION 3: STRATEGIES FOR COLLABORATION

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