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Description of document: Equal Employment Opportunity Commission (EEOC)
Coding Guidelines, Circulation Criteria and Basic
Processing posted on EEOC Office of Federal Operations
(OFO) internal website, 2019

Requested date: 01-May-2019

Release date: 25-July-2019

Posted date: 23-September-2019

Source of document: FOIA Request
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U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
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July 25, 2019

Re: FOIA No.: 820-2019-000398 (OFO Process)

Your Freedom of Information Act (FOIA) request, received on May 01, 2019, is processed. Our search began on May 01, 2019. All agency records in creation as of May 01, 2019 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) 653-6056, or by email to FOIA@eeoc.gov, or online at the following public access link (PAL): <https://publicportalfoiapol.eeoc.gov/palMain.aspx>. Your appeal will be governed by 29 C.F.R. § 1610.11.

[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)(7)(E)

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, Pub. L. No. 114-185, 130 Stat. 538, 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 EXEMPTION (b)(7)(E) OF THE FOIA:

1. Basic Processing document, URL was withheld.

Comments

This is in response to your Freedom of Information Act (FOIA) request. You request a copy of the Coding Guidelines, Circulation Criteria and Basic Processing posted on EEOC Office of Federal Operations (OFO) internal website. Your request is granted in part and denied in part.

Attached for your review are the above requested records (11 pages).

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

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

Basic Processing

When a party files an appeal, the Office of Federal Operations docket it and assigns a 10-digit number to the case. The first two digits of a docket number indicate the type of action, the next four digits reflect the fiscal year in which the action was filed, and the last four digits represent the numerical order in which the case was filed within a particular year. Listed below are the digits which are prefixed to a docket number and the type of case which they denote.

- 01 – an appeal from a final agency decision or final agency action;
- 02 – an appeal from a decision on a union grievance;
- 03 – a petition to review a decision of the MSPB;
- 04 – a request for enforcement or clarification;
- 05 – a request for reconsideration of a previous Commission decision;
- 06 – compliance matters; and
- 07 – an appeal from an agency when not implementing an AJ decision.

After OFO receives an appeal, assigns it a docket number, and enters that information into IMS (Information Management System), a docketing statement and a letter acknowledging the appeal are automatically generated, and the acknowledgment letter is sent to the appealing party. That party then has 30 days from the date of filing the appeal to submit a supporting statement or brief. The opposing party is also informed that an appeal has been filed.

If the appeal was brought by a complainant, the respondent agency is instructed to submit a copy of the complaint file to OFO within 30 days of the date of the issuance of the letter advising it of the appeal. If the complaint file is not received within the allotted time, the agency is advised that the Commission may draw an inference adverse to the agency in all matters on which no submissions were made to OFO.

As soon as OFO receives the complaint file, it is scanned into the DMS (Document Management System), examined to determine whether the case file is complete, and triaged to determine how it is to be processed. If the case is procedural in nature, it is assigned to an attorney for preparation of a draft decision. If it is a merits case and the file is complete, it is returned to the Control Unit where it awaits assignment.

Cases are assigned to the staff attorneys, who review the case files and prepare a draft decision. Writing attorneys who draft appellate decisions must follow the style and citation standards found in these manuals

(b)(7)(E)

The draft decision is then generally reviewed by a supervisor, a division director, and finally, the Office Director. Some decisions are issued on behalf of the office director by the ARP division directors. If approved, the decision is issued on behalf of the Commission.

Following approval of a draft decision by the Office Director, the signed decision is forwarded with the entire case file to the Control Unit, where it is checked for accuracy of items such as docket numbers, page numbers, case names, addresses, computer codes, envelopes and dates. The decision is scanned into DMS and then mailed to the parties and representatives involved.

Electronic copies of the decision are forwarded to several reporting agencies (IHS, Westlaw, and Lexis) where they are made available for access by subscribers to those research services. Additionally, each decision is posted on the Commission's website at www.eeoc.gov. A copy of each case in which an agency is ordered to take action is transmitted to the Compliance Unit, which monitors the case to ensure that the agency complies with the Commission's order.

When a request for reconsideration (RTR) is received, the request is processed almost in the same manner as an initial appeal, except that it does not go through screening. The original appeal file is located and matched with the file containing the RTR. RTR's are then assigned to an attorney for drafting of a decision. Draft decisions are forwarded through the supervisor, division director, and the Office Director for approval, and then circulated to the Commissioners for review if the case meets any of the criteria for granting the RTR.

A Commissioner may place a case "on hold" when there are questions about the decision or the Commissioner needs more time to review the decision. Following approval by the Commissioners, the decision is signed by the Executive Officer of the Executive Secretariat and is again returned to the Control Unit for issuance to the parties involved.

Circulation Criteria

The Commissioners have delegated to the OFO Director, the authority to directly issue certain appeals decisions. For other appeals, such as cases which raise novel or unusual issues, the decisions are drafted and circulated for the review and consideration and vote of the Commissioners. These include appeals which raise the following issues:

- (1) Decisions reversing an initial appeal decision and decisions reversing an AJ's determination of discrimination;
- (2) Decisions on cases involving novel issues or issues of first impression;
- (3) Decisions on appeals where the Commission is the respondent agency;
- (4) Decisions on enforcement of final Commission decisions pursuant to 1614.503(e) and (f);
- (5) Decisions on appeals filed under Section 321 of the Civil Rights Act, as amended;
- (6) Decisions awarding compensatory damages in excess of \$200,000;
- (7) Decisions under the Rehabilitation Act where the definition of disability is analyzed or is necessary to the disposition of the case;
- (8) Decisions on class complaints denying class certification or finding no discrimination; and
- (9) Decisions finding no discrimination on speak-English-only, English fluency, and accent cases.

Coding Guidelines

OFO assigns codes that are designed to track the status and disposition of appeals before the Commission. We use the data to track what type of rulings OFO issues in a given week/month/year etc. OFO staff can also look at closure codes in IMS to find out basic information about a particular case. Our annual reports to other agencies and the public rely upon the information entered into this tracking system. Therefore, it is important that we enter information that is as accurate as possible.

01 and 02 procedural cases

Any decision which fails to make a finding of discrimination or no discrimination is a procedural case. The only exceptions to this rule are that settlement breach cases and remands in summary judgment cases are coded as merits. Even if the Agency addressed the merits of the complaint, if OFO remands the complaint for further investigation and makes no finding relative to discrimination, our decision is procedural. These cases are to be coded 3K.

1. Appeal dismissed: Cases in which we determine that the appeal is not properly before us, regardless of the Agency's decision (*i.e.*, appeals which are denied for untimeliness or lack of jurisdiction), are to be coded 3K, 3N.
2. Final Agency Decision (FAD) affirmed: When we affirm the Agency's procedural rulings, the decision is coded 3K, 4H. Cases which are remanded due to an adverse inference are coded 3K, 3P, 4Q.
3. Final Agency Decision (FAD) reversed: Cases in which the Agency's procedural decision is reversed in total and the complaint is remanded, in total, are coded 3K, 3M, 4Q.
4. Partial reversal: Where the Agency's procedural decision is reversed and remanded in part, and affirmed in part, the Agency's decision is considered modified, and our case is to be coded 3K, 3M, 4J, 4Q.
5. Merits remanded: Finally, when an Agency's merits decision is remanded in total, *i.e.*, for a supplemental investigation, the appropriate codes are 3K, 3L, 4Q. Remember to use a procedural cover/code sheet in this instance.
6. Compliance code: By now, you have probably guessed that the 4Q code "compliance required" is used whenever we are ordering an Agency to do something. This code signals our control and compliance unit that the case should be assigned to the compliance unit for compliance action.

Tricky Scenarios

1.Q: Where we are combining a procedural ruling with a merits determination on the same complaint, how is this coded?

A: Where there are two case numbers, you may use two separate code sheets to capture the rulings. Where there is only one case number that can be assigned, fill out the "embedded procedural issue" codes.

2.Q: Where we are vacating an Agency's entire procedural determination and remanding for a supplemental investigation into a procedural issue (*i.e.*, to see whether someone had constructive notice of a time limitations period), can we utilize the 3L code?

A: No, use the 3K, 3M and 4Q codes only.

3.Q: How do we code class action cases?

A: If they involve the class certification issue, we will code them as procedurals (See attachment 4). If they involve a finding on the merits or on a remedies issue, we will code them as merits decisions.

01 and 02 Merits Cases

For an OFO decision to be coded as a merits case, it must generally address the merits of the complaint. Again, the exceptions to this rule are settlement breach and summary judgment remand cases. Those decisions where we are ruling on the merits of attorney's fees and compensatory damages claims are also coded as merits cases. If the merits of an attorney's fee claim are not addressed, the decision is procedural and the codes cited above apply. All merits cases are coded 4A.

When we are reaching a finding of no discrimination, or are not making a determination on the issue, we will next check 4C.

The remaining 4E through 4Q codes show how our decision impacted on the Agency's and/or the AJ's decisions.

Where an adverse inference on one or more issues is ruled upon in the decision, the 3P code should be marked.

3L Coding Rule: In those cases where one or more of the merits issues were remanded for further processing, the 3L code would also be reported. Please note that 3L codes are used only when remanding an Agency's merits decision, and 3M codes are used only when remanding an Agency's procedural decision.

Separate codes (4T, 4U, 4V) are provided for completion in decisions where an AJ issued summary judgment.

Coding of findings of discrimination (01/07)

Where we find discrimination, in whole or in part, the 4A is followed by 4B. On the lines under the 4B code, enter the basis and issue codes on which you have found discrimination.

Subsequent codes will identify that the finding was in whole or in part, *i.e.*, 4H or 4I would indicate that the finding was the same on all issues, while the 4J would indicate that the finding was mixed.

Where you are reversing in part and affirming in part, both the 4B and 4J codes should be checked.

Both 4B and 4C codes should not be reported on the same decision.

Again, the remaining 4E through 4Q codes show how our decision impacted on the Agency's and/or the AJ's decisions.

Discrimination findings provide the one clear exception to the above 3L coding rule. Notwithstanding the previous instructions above, in cases where you are finding discrimination and remanding to a hearings unit for a compensatory damages and attorney's fees ruling, **DO NOT REPORT THE 3L CODE**. Instead, check the 3W code marked "Remand to AJ for remedies."

Coding Agency Findings of Discrimination

In cases where the Agency has found discrimination and we are ruling on the remedy (ordering items such as compensatory damages, posting a notice, etc.), we are essentially ratifying the Agency's finding. Therefore, in such instances, we will be coding the case as a discrimination finding, but noting the Agency's finding by also checking the 4E, "Agency found discrimination" code.

The only caveat to this rule is that while we want to capture all findings, we do not want to double count them-so if we have previously issued a decision from this office (OFO or the Commission) finding discrimination on the same matter, we would not code a later compensatory damages or remedies decision as a finding.

Compensatory Damages/Attorneys Fees

In all cases where a compensatory damages issue is addressed on its merits (not remands for compensatory damage assessments), please check the C3 code.

In addition, in those cases where you are only addressing the issue of the amount of Compensatory Damages, the following rules apply:

For completion of Attorneys Fees (3H, 3I, 3J) and Compensatory Damages (3T, 3U, 3V) codes, use the following golden rules.

1. If you are awarding the Complainant the amount s/he has requested, use the OFO approved compensatory damages/attorney's fees codes (3U or 3I).
2. If you are awarding only what the Agency awarded in its FAD, use the OFO denied compensatory damages/ attorney's fees codes (3T or 3H).
3. If you are awarding something in between what the Agency awarded and Complainant requested, use the OFO modified compensatory damages/attorney's fees codes (3V or 3J).

For Example: Where we are awarding the level of attorney's fees requested by Complainant, but are awarding more compensatory damages than awarded by the Agency in its FAD, but less than Complainant requested, on appeal, we would code as follows: 4A, 4C, 4F, 3I, 3V, 4Q

A final note on compensatory damages cases. When you code decisions which only address the compensatory damages issue, be careful not to check the "finding discrimination" codes.

Settlement Breach

With Regard to Settlement Breach Cases, use the following codes:

1. If you are finding no breach of settlement, use the 4A, 4S, 4F, 4H codes.
2. If you are finding breach, in whole or in part, where the Agency did not do so, use the 4A, 4R, 4F, 4I, 4Q. If the Agency also found even a partial breach, substitute the 4E for the 4F code. If you are finding breach in part only, and affirming the Agency in part, add the 4J code.
3. If you are remanding a settlement breach case for a supplemental investigation, we look at it in the same way as any complete remand of a merits case and therefore it becomes procedural in nature. You will use the procedural cover/ coding sheet and report the 3K, 3L, 4Q codes.
4. With a partial remand/partial finding of breach, you will be using the merits cover/code sheet and complete the following codes: 4A, 4R, 4F, 4J, 4Q.

Some Additional Merits Coding Shorthand

Here are a few additional common merits coding situations you will encounter. Keep in mind this list is by no means exhaustive. When in doubt, ask your supervisor for assistance.

- (1) AFFIRM/ NO AJ/NODISCRIM - Where we affirm the FAD finding no discrimination and there was no hearing involved. (4A, 4C, 4F, 4H)
- (2) AFFIRM/ AJ HEARING/NODISCRIM - Where we affirm the Agency's notice of final action finding no discrimination and there was a hearing and a finding of no discrimination by the AJ and the Agency. (4A, 4C, 4F, 4H, 4L, 4N)
- (3) AFFIRM AJ SUMMARY/NO DISCRIM - Where we affirm the Agency's notice of final action finding no discrimination and the AJ issued a summary judgment decision without a hearing. (4A, 4C, 4F, 4H, 4L, 4N, 4T, 4U)
- (4) REVERSE AND REMAND/ AJ SUMMARY/NO DISCRIM - Where we are really vacating the Agency's notice of final action and AJ summary judgment decision finding no discrimination and are remanding the case to the hearings unit for a hearing. (4A, 4C, 4F, 4I, 3L, 4L, 4O, 4T, 4V, 4Q)
- (5) REVERSE/ NO AJ - Where we are reversing the Agency's FAD finding no discrimination and no AJ is involved. (4A, 4B, basis/issue codes, 4F, 4I, 4Q)

- (6) REVERSE/ AJ HEARING - Where we are reversing the Agency's notice of final action finding no discrimination and an AJ found discrimination after a hearing. (4A, 4B, basis/issue codes, 4F, 4I, 4K, 4N, 4Q) Where compensatory damages/other remedies issues are remanded to the AJ, add 3W code.
- (7) REVERSE IN PART/ AFFIRM IN PART/NO AJ - Where we are reversing the Agency's FAD finding no discrimination in part and no AJ is involved. (4A, 4B, basis/issue codes, 4E or 4F, 4J, 4Q)
- (8) REVERSE IN PART/REMAND IN PART/ NO AJ - Where we are finding discrimination on some claims, without a hearing, and remanding others for a supplemental investigation. (4A, 4B, basis/issue codes, 4F, 4J, 4Q).
- (9) AFFIRM IN PART/REMAND IN PART/NO AJ - Where we are finding no discrimination in part and remanding for a supplemental investigation in part, but there is no hearing. (4A, 4C, 4F, 4J, 3L, 4Q).
- (10) REVERSE IN PART/AFFIRM IN PART/WITH AJ HEARING/DISCRIM - Where we are reversing the Agency's notice of final action in part, after an AJ hearing finding discrimination. (4A, 4B, basis/issue codes, 4F, 4J, 4K, 4N,4Q) Where compensatory damages/other remedies issues are remanded to the AJ, add 3W code.
- (11) REVERSE AJ FINDING OF DISCRIMINATION AFTER A HEARING - Where we are affirming an Agency notice of final action and reversing an AJ finding of discrimination after a hearing, we will be preparing the decision for circulation, using a circulation cover sheet and a full page 01 merits code sheet. (Attachments 10 and 2)(4A, 4C, 4F, 4H, 4K, 4O)
- (12) AFFIRM AGENCY FAD/ NO DISCRIMINATION/ AFFIRM EMBEDDED PROCEDURAL ISSUE (4A, 4C, 4F, 4H, and check the appropriate box on the embedded procedural issue sheet. In this instance it will read "Procedural Affirmed A")
- (13) REVERSE IN PART/AFFIRM IN PART/WITH AJ HEARING/DISCRIM/REVERSE IN PART/ AFFIRM IN PART EMBEDDED PROCEDURAL ISSUE - Where we are reversing the Agency's notice of final action in part, after an AJ hearing finding discrimination. We are also reversing in part an underlying embedded procedural issue. (4A, 4B, basis/issue codes, 4F, 4J, 4K, 4N,4Q) Where compensatory damages/other remedies issues are remanded to the AJ, add 3W code. Also check the appropriate box in the embedded procedural issue coding section. In this instance it will read "Procedural Modified I."

03 cases (Petitions to review MSPB decisions)

MSPB cases are the easiest to code. Any decision which denies consideration for whatever reason is procedural and is coded 3K. Any decision which requires additional evidence to be taken on all issues (whether by MSPB or by EEOC) is considered procedural. Any decision which finds discrimination or no discrimination on one or more issues is a merits case (4A).

For example: A routine concur with the MSPB's decision would be coded as 4A, 4C, 5C.

04 Decisions (Petitions for enforcement/clarification)

These are relatively easy to code because they are coded as merits decisions and there are only a few codes to choose from. Just remember that if you are finding the Agency's action to be in compliance with OFO's prior decision you only need to code 4A and 7L. If you are issuing a clarification decision, where you are clarifying the remedy only, code 4A and 7P. Codes 7Q and/or 7R, and 4Q are for situations where you are ordering the Agency and/or the Complainant to do something.

05 Requests for Reconsideration

The 05 code sheet is divided into two major parts: procedural and merits. The two most important rules to be aware of here are:

- (1) you will always fill out codes either in the procedural side or the merits section, never both sections at once.
- (2) All denials of requests for reconsideration are considered procedural.

05 Procedural cases

The most important thing to remember here is that most 05 cases are procedural in nature. This designation has nothing to do with how the 01 appeal was initially decided by OFO. Any case in which the RTR is denied, whether because it is untimely, or it fails to meet one of the two criteria set out in the regulations, or for any other reason, is procedural and is coded 3K, either 6Q or 6R, and 6D. The codes 6N and 6P indicate the reason for the denial of the 05 (if 6N, the RTR was denied due to the failure to meet the criteria for such a request; if 6P, the RTR was denied due to some other procedural reason). The 4Q code only needs to be added where compliance was required in the 01 decision. In any other 05 decision where the 01 decision addressed procedural matters, the 05 decision is procedural. The exception to this would be if the 01 decision was procedural, but the 05 decision disagreed and addressed the merits of the underlying complaint and made a finding relative to discrimination (including a decision to remand a portion of the Agency's merits decision for further investigation).

Please note that the 3L code is reported in our procedural cases only when all issues of an Agency's merits decision have been remanded. Each case requires identification of the subject decision, *i.e.*, it is a procedural decision (3K) or a merits decision (4A). Each case also requires identification of the underlying 01 decision, *i.e.*, that the 01 decision was either procedural (6Q) or merits (6R). Finally, when the 01 decision made a finding relative to discrimination and the 05 decision vacates that finding (the Agency's decision is not reversed or modified) and remands the matter to the Agency for processing, the code 6M is used. This is the only time the 6M code is reported.

05 Merits cases

We only use this section of the 05 code sheet when we are granting a request for reconsideration on a merits decision. The 4A code is reported when the 05 decision includes a

finding of discrimination (6E), or no discrimination (6F) addresses a breach of settlement allegation (6S or 6T), addresses an attorney's fee matter (3H, 3I, or 3J), or addresses a compensatory damages matter (3T, 3I, or 3V). You must also report on the underlying 01 decision, *i.e.*, whether it was a procedural decision (6Q) or a merits decision (6R). The subsequent codes define how the 05 decision impacts the 01 decision (6H, 6I, or 6J); how the 05 decision impacts the Agency decision (4H, 4I, or 4J); and how the 05 decision impacts the AJ's decision (4N, 4O, or 4P). In these instances, where one or more issues (but not all) of an Agency's merits decision are remanded for further processing, the 3L code is also required.

Tricky Scenarios

1.Q: Where we are granting a request for reconsideration on a procedural issue and addressing the merits of the case for the first time, how is this coded?

A: This is an example of the "bottom line" rule discussed above (See general principle 2). Since the "bottom line" is that we are addressing the case on its merits, we would code it on the merits side of the 05 code sheet.

2.Q: Where there is more than one request for reconsideration at issue (e.g. cross requests), but only one request number, and you are granting one and denying one, how will we code?

A: Again, the "bottom line" is that we are granting at least in part, so the grant will predominate in coding the decision.

3.Q: How do we code a grant of a request for reconsideration on an "embedded procedural issue."

A: If we are granting the request for reconsideration only on an "embedded procedural issue" in a merits case, fill out the section of the 05 coding sheet marked procedural decision, so that the treatment of the procedural will be recorded. However, check 6R, not 6Q, to indicate that the underlying appeal was merits in nature (illustration of guiding principle 3).

If we are granting the request for reconsideration on both one or more merits issues and on an "embedded procedural issue," fill out the portion of the 05 coding sheet marked merits decision, (another illustration of guiding principle 3) and include the "Embedded Procedural Issue Coding Sheet" behind the 05 case disposition sheet to record the disposition of the procedural issue.

07 Merits Cases

These are coded in the same manner as the 01 merits cases discussed above, using the merits cover/coding sheets.

Categorizing Appeals under the Priorities of the Strategic Enforcement Plan (SEP) and Federal Sector Complement Plan (FCP)

<upload Word document titled "Federal Sector Guide for the Identification and Categorization in IMS of SEP and FCP Priorities">

<upload Word document titled "Federal Sector Guide for the Categorization and Assignment of Action Categories in IMS">