

UNITED STATES GOVERNMENT

Memorandum

TO : All Commissioners

DATE: June 4, 1975

FROM : Commissioner James H. Quello

SUBJECT: EEOC Memorandum

This is my initial reaction (and recommendation) to the EEOC memorandum - for general information.

My concerns with the two proposals advanced to clarify and implement the EEO policy are with the focus of both plans. Neither addresses the real problem which is, in my opinion, the lack of a clear-cut complaint procedure that is capable of a reasonably expeditious resolution of inequities. We have no Commission complaint procedure, so far as I have been able to determine, which provides the complaining party with any assurance that his concerns are being seriously addressed. Our reliance upon EEOC has not been totally effective in the past.

While I applaud the announced intention in each of the two plans to work more closely with EEOC, I believe that the Commission should develop a specific procedure for receiving and processing complaints. By removing this serious source of frustration, occasioned by our lack of a complaint procedure, I believe that we can increase public confidence in our stated policy and further the objectives of that policy.

I suggest that we give serious consideration to the following:

- 1) Establishment of simple, clear-cut procedures for receiving and expeditiously processing discrimination complaints.
- 2) Establishment of a threshold standard for evaluation of complaints.
- 3) Prescription of a response procedure for licensees with the appropriate forms (as simple and brief as practicable).
- 4) Establishment of a relationship with EEOC for the purpose of expediting the resolution of complaints where EEOC involvement is necessary or desirable.

I agree with Commissioner Robinson's assessment of the two plans as stated in his informal memo particularly that we have proposed "solutions in search of a problem". I believe the proposals have failed to properly address the most important problem. I fail to see how more paperwork, time-consuming reports and "on site" investigations will materially affect what I believe to be the crux of the problem, i. e., our inability to effectively respond to legitimate complaints.



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