
U.S. Equal Employment Opportunity Commission



2004
Repositioning Workgroup
Report

March 3, 2004

2004 Repositioning Workgroup Report

PURPOSE OF REPORT

To present Vice Chair Naomi Churchill Earp and Commissioner Paul Steven Miller, the co-sponsors of the Repositioning Workgroup, with recommendations on repositioning EEOC offices in the field, within the parameters of the Charge below.

CHARGE TO THE WORKGROUP

- i. Recommend whether, in light of the NAPA study, budgetary and management considerations, the Commission should reduce the current number of district offices;
- ii. Assuming, for the sake of argument, that the workgroup agrees that the number of district offices should be reduced, recommend where the EEOC should locate 10 and 11 "mega" district offices using the information provided to the workgroup regarding demographics, charge filings, current field office staffing and performance, as well as the workgroup's knowledge and experience at the Commission;
- iii. Recommend how the remaining field offices should be distributed to maintain a presence in currently served areas; and
- iv. Recommend how a "mega" district office should be structured.

GOAL OF THE WORKGROUP

The Workgroup operated with the goal of producing an objective proposal responsive to the Charge given to the Workgroup. In this regard, the Workgroup wishes to note that it did not have the option to make alternative proposals (e.g., to recommend the number or location of other than 10 or 11 "mega" offices). Clearly, the Workgroup would have benefitted from having been afforded a longer time period to review the substantial amount of available information, to obtain and study a great deal of additional data, to engage in more extensive discussion and possibly to arrive at different recommendations. This Report summarizes the results achieved through consensus by the Workgroup and does not purport to represent the positions of any single individual within the group or the positions of anyone outside of the Workgroup. Moreover, the Workgroup recognizes that the results of its work are subject to debate and that further analysis is important for the Commission's decision-making process. Nevertheless, the Workgroup believes that it successfully completed its mission by responding to the Charge through a well-reasoned and collaborative process, with a focus on the best interests of the Commission and on the significant ramifications of a potential repositioning.

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Charge I

Recommend whether, in light of the NAPA study, budgetary and management considerations, the Commission should reduce the current number of district offices.

The representatives from the field on the Repositioning Workgroup (Workgroup) do not believe that a business case has been made for reducing the current number of district offices and, therefore, do not recommend that the current number of district offices be reduced.

We listened to presentations by the Chair, Vice Chair, Commissioners and Chief Financial Officer and received input from our peers. We have not, however, been provided with an explanation of the current "problem" and how reducing the current number of district offices resolves the "problem." Any discussion on restructuring or repositioning must be premised upon ensuring that the Commission can be more effective in carrying out its mission of enforcing Title VII, ADEA, ADA and EPA. Our collective experience demonstrates that presence in a community makes a difference in the Commission's ability to effectively enforce these laws. Commitment to that presence as evidenced by staff resources and senior management is essential to effectively carry out the work of the Commission. The current field structure has worked well. The Commission's success since the implementation of PCHP and the increased emphasis on enforcement and legal staff working together demonstrate that the current field structure has been and continues to be effective.

To the extent that the Charge references possible sources of support for reducing the current number of district offices, i.e., NAPA study, budgetary and management considerations, we will address each of these issues.

NAPA Study

Since the publication of the NAPA study, numerous comments have been submitted to the Commission, including comments made at the Commission meeting on September 8, 2003. We believe that it is important for the Commission to consider all of those comments and recognize that most of the comments disagree with the recommendation to restructure the field. It is also important to note that the NAPA study does not recommend that the field be restructured into 10 or 11 "mega" districts. The NAPA study suggests three options on this issue: (1) maintain a dispersed group of offices; the ten federal regional cities; and cities with the highest volume of charge receipts (listing the top 17 on this criterion). Each option is premised on the successful implementation of a National Call Center, increased use of telework and piloting of these options.¹ See NAPA study pp. 31-45.

¹ The IG's report on telework recognized that the Commission needed to allocate
(continued...)

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We do not believe that the fact that there are 10 regional cities is a business justification for restructuring the field. The Commission has not maintained a regional structure since 1979. Additionally, the guidance under which federal agencies organize themselves into 10 regions was withdrawn more than nine years ago. Furthermore, the concept of 10 regional cities is not related to effectively carrying out the mission of the Commission.

Budgetary Considerations

We will not dispute that the Commission faces tough times financially or that the expectation is that the budget for the Commission will remain flat as costs increase. However, the information has not been provided to establish that such drastic measures as reducing the number of current district offices is necessary. Nor was the budget information presented to show how much money, if any, could be saved from repositioning into 10 or 11 "mega" offices. If budgetary considerations drive the need for repositioning the field, the Commission should know the amount of savings. If money is saved from this process, the Commission should know how it will be spent. Furthermore, other cost-saving measures should be considered, such as cost reduction at Headquarters, before reducing the current number of district offices. As the NAPA study recognized, the mission-critical work is being done in the field. If reducing the current number of district offices is essential for budgetary reasons it should involve the fewest offices and the least disruption of the current structure possible. Without more information and further discussion, budgetary considerations cannot make the business case for reducing the current number of district offices.

Management Considerations

It has also been suggested that there are management considerations for reducing the current number of district offices. It is our collective belief that management problems or issues should be dealt with as management problems. We should not re-invent a structure because Headquarters has issues with the management in the field. The Commission should hold the senior managers in the field accountable and responsible for the work of the Commission. If there is a particular management problem, it should be addressed on an individual level. We have not heard of any management considerations that provide a business case for reducing the current number of district offices.

¹(...continued)

additional resources to have a successful telework program. It is absolutely necessary for the Commission to allow employees secure access to internal information and systems such as IMS and Insite, and to provide regular IT support and resources, in order for field employees to be effective in their jobs from remote locations on a regular basis. The Chief Financial Officer, in response to Workgroup questions, stated that the cost for this was not in the EEOC budget for 2004.

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Charge II

Assuming, for the sake of argument, that the workgroup agrees that the number of district offices should be reduced, recommend where the EEOC should locate 10 and 11 "mega" district offices using the information provided to the workgroup regarding demographics, Charge filings, current field office staffing and performance, as well as the workgroup's knowledge and experience at the Commission.

Recommendation 1 – if ten offices are to be identified as "mega" offices, they should be located in the following cities:

1. Atlanta
2. Chicago
3. Dallas
4. Indianapolis
5. Memphis
6. Miami
7. New York
8. Philadelphia
9. Phoenix
10. San Francisco

Recommendation 2 – if eleven offices are to be identified as "mega" offices, they should be located in the following cities:

1. Atlanta
2. Chicago
3. Dallas
4. Indianapolis
5. Memphis
6. Miami
7. New York
8. Philadelphia
9. Phoenix
10. San Francisco
11. St. Louis

In arriving at these recommendations, the Workgroup initially focused on creating an objective, systematic process by compiling and defining a list of factors upon which to base its determinations. Next, the Workgroup arranged the Commission offices in the field into initial groupings for discussion, based upon geographic proximity between offices and a desire to

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establish an equitable distribution of workload in each grouping. The Workgroup then applied the agreed-upon factors and considered a wide array of information relevant to each factor in order to determine the appropriateness of offices for designation as "mega" offices. The Workgroup also considered alternative groupings of offices as potential configurations for comparing offices. The Workgroup ultimately reached consensus through a careful analysis, emphasizing the need to effectively serve customers in order to fulfill the mission of the Commission. This section of the Report will proceed by setting forth the Workgroup's deliberations in more detail.

A. Factors Developed for Considering the Location of "Mega" Offices

At the outset, the Workgroup brain-stormed to develop a list of potential factors which might be relevant to determining where "mega" offices should be located. After further discussion, the Workgroup identified the criteria that it determined were most important to decide the issue at hand. Although these factors will be listed separately below, the Workgroup recognized that many of these factors overlapped or were interrelated. The following list represents the factors which the Workgroup applied:

- *Workload*
- *Population*
- *Accessibility*
- *Performance of Current Offices*
- *Size of Current Offices*
- *Visibility*
- *Operational Efficiency*
- *Employers*
- *Economies of Scale*
- *Operation Costs*

Workload

The Workgroup agreed that it should consider workload in deciding where "mega" offices should reside because the "mega" offices should – for the sake of uniformity, consistent customer service, and operational efficiency – have similar responsibilities, goals, procedures, customer bases, and resources. Therefore, the Workgroup deemed relevant the workload of the potential "mega" office as well as the collective workload of the potential non-"mega" offices that would fall under the oversight of the "mega" office. The Workgroup determined that this factor would encompass, among other things, charge receipts, transfers in and out, hearing requests, cases for litigation, outreach, FEPA activity, TEROs' presence, and revolving fund activities.

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Population

The Workgroup studied the population of various geographic areas in order to determine where "mega" offices would best serve customers such as charging parties, employers, outreach audiences, etc. In considering population, the Workgroup discussed topics such as gross population, population density, population trends, number of individuals employed, minority populations, and areas occupied by under-served communities.

Accessibility

With respect to accessibility, the Workgroup examined the degree to which Commission customers could readily travel to locales for potential "mega" offices – with a focus on geographic proximity, airports, roadways, and public transportation. The Workgroup also considered the travel ability, efficiency and cost for other Commission offices (including non-"mega" offices) to reach potential "mega" offices. The Workgroup further conferred on whether Commission functions and customer services could be performed through alternative means (e.g., telework, electronic filing, national call center).

Performance of Current Offices

The Workgroup concluded that the performance of current offices in recent years is a factor for two reasons: (1) the performance of a particular office provided an indication of that office's potential to operate effectively as a larger "mega" office, and (2) the Workgroup's viewpoint that the Commission should not substantially modify the operations of offices that currently operate effectively. Of course, the Workgroup recognized that the performance of an office depends on many circumstances that may not be within the control of the office – such as availability of resources – and that conclusions regarding the performance of an office may differ depending on the type of assessment employed. Moreover, the Workgroup understands that organizational alignment should not be primarily based upon office performance since the performance of an office may change over time, and that performance issues should generally be addressed through management rather than structural change. Nevertheless, the Workgroup agreed that it should consider office performance as one criterion in order to assemble a list of office locations that would best enable the Commission to carry out its mission.

Size of Current Offices

On this factor, the Workgroup primarily focused on whether particular offices possessed the resources and infrastructure to operate effectively as a "mega" office, responsible for local functions as well as overseeing the operations of non-"mega" offices under its jurisdiction. The Workgroup evaluated several aspects relating to the size of current offices, including: staffing, resources, programs, training, and physical office space. The Workgroup's discussion of office

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size often paralleled its dialogue on other factors, such as economies of scale and operation costs, with an understanding that resource allocation for any given office may change.

Visibility

The Workgroup stressed the importance of maintaining a presence in geographic locations of high visibility to best establish its message by serving Commission stakeholders and fostering positive media relationships. The Workgroup strongly believes that visibility is instrumental in maintaining and promoting the effectiveness of the Commission's mission to eradicate discrimination through education, prevention, enforcement, litigation, dispute resolution, and by serving as a model for employers.

Operational Efficiency

In assessing operational efficiency, the Workgroup concentrated on resolving whether specific offices were centrally located in relation to the non-"mega" offices under its jurisdiction and therefore more easily accessible, with lower travel costs between offices. The Workgroup agreed that greater accessibility between offices would enhance the centralization of certain functions and decision-making by the "mega" office, thereby improving operational efficiency. In applying this factor, the Workgroup again considered the practicality of alternative methods of work and communication, such as telework and e-mail.

Employers

With regard to this factor, the Workgroup considered: locations with large numbers of employers, employers with sizable organizations (100+ employees), and the type of employers who are typically customers of the Commission. The Workgroup applied this factor in a similar manner as it considered population, with a relationship to other factors such as workload, accessibility, visibility, structural efficiency, and operation costs.

Economies of Scale

The Workgroup employed this concept in studying the ease with which a current office might make a transition into a "mega" office with added responsibilities. The Workgroup relied upon a review of several considerations, including staffing, resources, size of operation, and physical office size. The Workgroup particularly inspected whether key positions were presently encumbered within the geographic area of potential "mega" offices. We understood that electronic work or telework might obviate the need for the location of a full complement of certain positions in the "mega" office, and that positions could, therefore, be spread across the geographic area covered by the "mega" office, giving greater flexibility for meeting customer needs.

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Operation Costs

The Workgroup considered operation costs in deciding the location of "mega" offices. The Workgroup specifically paid attention to the office rental costs in various locations. Additionally, the Workgroup considered the need for travel, both for an office to serve its customers (e.g., on-site investigations, depositions, administrative hearings, outreach, etc.), and travel between offices so that a "mega" office could effectively oversee the offices under its jurisdiction. In examining rental and travel costs, the Workgroup also balanced other important factors such as accessibility, office size, visibility, efficiency, and economies of scale. Moreover, the Workgroup discussed the practicality of reducing the need for travel through alternatives (e.g., telework, electronic filing, national call-center).

B. Application of Relevant Factors to Decide Location of "Mega" Offices

The Workgroup systematically applied each of the factors to compare offices and decide where ten, and alternatively eleven, "mega" offices should be located. Although the deliberative process of the Workgroup was too extensive to reproduce in this report, the following synopsis captures the essence of the Workgroup's analyses and conclusions.

Atlanta

In the South, the Workgroup compared Atlanta and Charlotte against the ten factors and selected Atlanta as the "mega" office. The Workgroup based this result on the fact that Atlanta has: approximately twice the workload of Charlotte; higher minority representation; high accessibility of Atlanta as a Federal region; larger office size; and high visibility in light of its civil rights history and legacy.

Chicago

The Workgroup agreed that Chicago should be assigned as the "mega" office when compared to St. Louis and Milwaukee. The Workgroup determined that Chicago has: largest workload of the three offices; the largest population (including minority population and number of federal employees); central location between St. Louis and Milwaukee; accessibility; largest office size; and economies of scale. By comparison, the Workgroup considered that St. Louis has: the second-largest workload; outreach and revolving fund activities; and lowest office rental cost. Milwaukee has the lowest workload, smallest population and office size.

Dallas

Texas presented a difficult challenge for the Workgroup because of the size of the region and the comparable rankings of the Dallas, Houston, and San Antonio offices for consideration as a

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"mega" office. The Workgroup eventually narrowed its choice, giving a small edge to Dallas. The Workgroup noted that Dallas ranked higher in accessibility, visibility, FEPA relationships, federal sector workload, and economies of scale. The Workgroup observed that the Houston office has a large overall workload and the largest population, including the largest minority population. The Workgroup noted that San Antonio has the lowest workload and population.

Indianapolis

In this region, the Workgroup also entered into substantial discussion regarding Indianapolis, Detroit, and Cleveland, but finally concluded that Indianapolis was the best choice for the "mega" office. The Workgroup determined that Indianapolis has: the largest workload; accessibility; the largest office size; most central location amongst the three offices and surrounding area offices; economies of scale; and the lowest office rent cost. The Workgroup noted that Detroit has the largest population, including the largest minority population. The Workgroup noted that Cleveland has the largest federal workforce and relatively low office rental cost; however, these factors were not sufficient for the Workgroup to select either Detroit or Cleveland.

Memphis

The Workgroup made an extremely tough choice, giving the nod to Memphis over New Orleans. The Workgroup gave consideration to several aspects favoring New Orleans: larger overall workload; greater minority population; and the location of the seat of the 5th Circuit. Nevertheless, the Workgroup concluded that several significant factors collectively established Memphis as a better location for a "mega" office: larger federal workload; larger state population and greater number of employed individuals; greater accessibility in transportation; larger office and greater ease of transition to a "mega" office; and much lower office rental cost.

Miami

In the Southeast region, the Workgroup selected Miami over Birmingham. Our decision was based on the following in favor of the Miami office: larger workload; greater overall state population, as well as a larger number of employed private and federal workers; accessibility; and larger office size. The Workgroup heavily considered the visibility of the Birmingham office due to its civil rights legacy and tradition; however, that did not outweigh the other factors noted above.

New York

The Workgroup determined that the New York office should be designated as a "mega" office. This office ranked highly in the relevant factors of workload, population, accessibility, performance, office size, visibility, operational efficiency as a centrally-located office, number

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and type of employers, and economies of scale. The operation cost of the New York office is very high in terms of rent; however, the Workgroup concluded that New York's operation cost was justified by its high ranking in every other factor.

Philadelphia

The Workgroup compared Philadelphia and Baltimore and decided upon Philadelphia as a "mega" office in the Mid-Atlantic region on the bases of its greater rankings in the areas of workload, state population, accessibility, performance, and economies of scale. The Workgroup briefly discussed the Washington, D.C. office by comparison; however, while the Workgroup noted the D.C. office's large federal sector workload, concentration of employers, tremendous number of federal sector complainants, and visibility, the Workgroup found that the D.C. office did not rank sufficiently high in the other factors to warrant further consideration, particularly given the fact that the Commission has a visible presence in the nation's capital as the location of Commission Headquarters.

Phoenix

The Workgroup compared Phoenix and Denver, and identified Phoenix as a "mega" office based on the following: substantially higher workload; larger population; a trend of larger population increase; larger minority population; and greater office size. The Workgroup noted the larger federal workload and lower office rental cost in Denver.

San Francisco

The Workgroup decided that San Francisco should serve as the "mega" office when compared to Los Angeles and Seattle. The Workgroup considered that San Francisco has: the largest workload; a central location between Seattle and Los Angeles; large employer base and federal workforce; Federal center; visibility; economies of scale; and experience dealing with multiple offices in a wider geographical area. The Workgroup noted that Los Angeles has the largest population of the three offices (including the largest population of Latinos and Asians) and had the largest office size; however, these factors did not outweigh the factors noted above concerning San Francisco. The Workgroup noted that Seattle has the lowest population, office size, and workload among the three offices.

St. Louis

In developing the 11th "mega" office, we looked for groupings of offices which would produce an 11th mega jurisdiction with equitable distribution of the workload. The group recognizes that other options are possible; particularly if greater consideration is given to population and population trends. These considerations suggest that the 11th office could be in the South or Southwest.

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Charge III

Recommend how the remaining field offices should be distributed to maintain a presence in currently served areas.

The Workgroup's Charge involved recommending how the remaining field offices should be distributed to maintain a presence in currently served areas. Once we designated the "mega" offices, the remaining district offices (and the area and/or local offices reporting to the respective original district office) now fall under the jurisdiction of the "mega" office. Due to geography, population, workload and other considerations we recommend moving the Newark and San Juan offices under the New York jurisdiction and the El Paso Office to Phoenix. We have attached a draft of the revised jurisdictional boundaries for a 10 or 11 "mega" district configuration. We are making the recommendations on the following page regarding office distribution:

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Mega Office	District Office	Area Office	Local Office
New York	None	Boston Newark	Buffalo San Juan
Philadelphia	Baltimore	Washington Field Norfolk Richmond Pittsburgh	None
Atlanta	Charlotte	Raleigh	Greensboro Greenville Savannah
Miami	Birmingham	Tampa	None
Memphis	New Orleans	Jackson Little Rock Nashville	None
Dallas	Houston San Antonio	Oklahoma	None
Phoenix	Denver	Albuquerque El Paso	None
San Francisco	Los Angeles Seattle	San Diego	Fresno San José Honolulu Oakland
Chicago	Milwaukee St. Louis	Minneapolis Kansas City	None
Indianapolis	Cleveland Detroit	Cincinnati Louisville	None

If we were to consider an 11th "mega" office, we selected St. Louis.

Mega Office	District Office	Area Office	Local Office
St. Louis	None	Kansas City Little Rock Oklahoma	None

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Charge IV

Recommend how a "mega" district office should be structured.

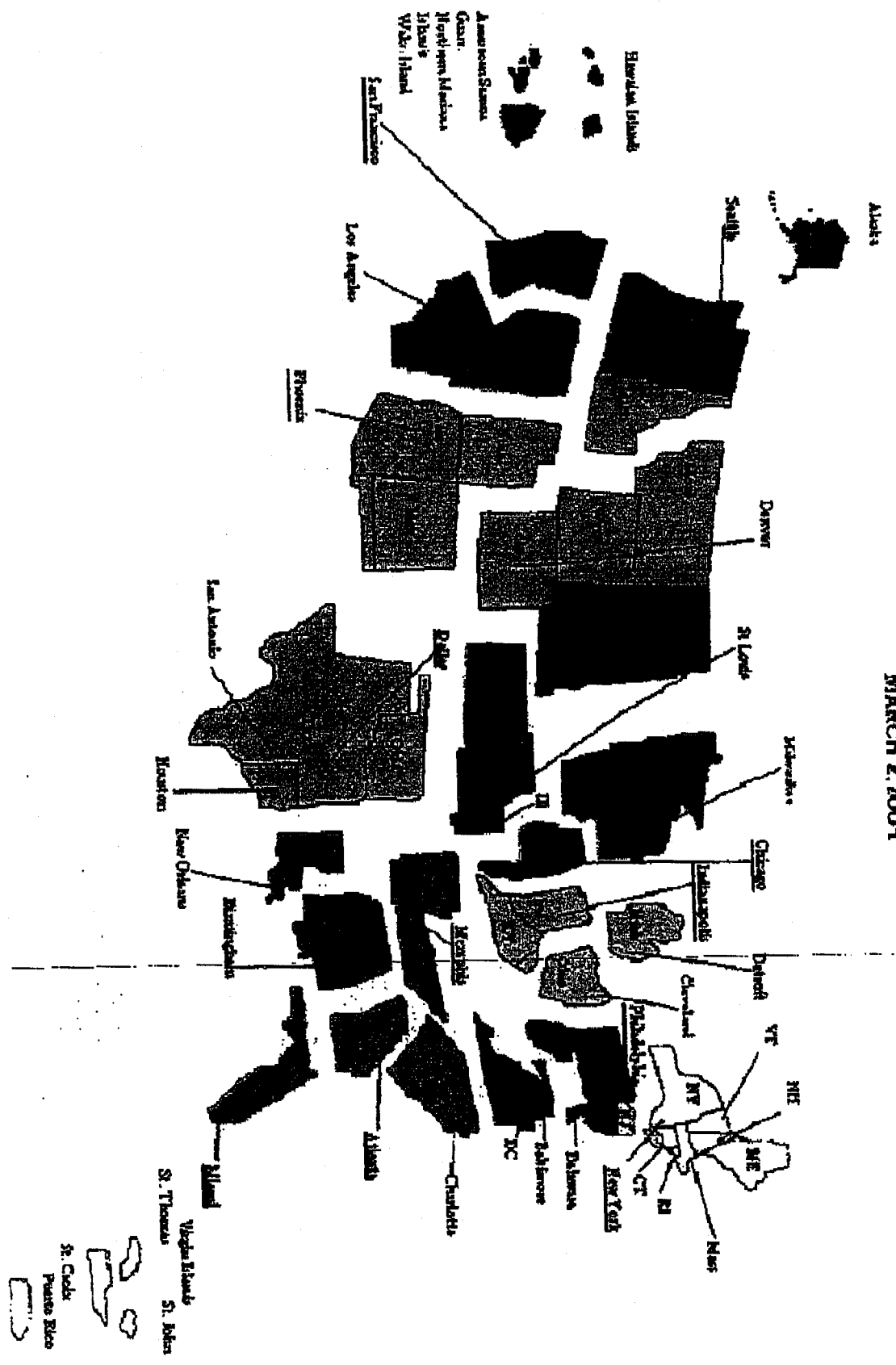
The Charge given the Workgroup does not define the purpose or function of a "mega" office. Further, the Workgroup was specifically told that it could not recommend or consider grade levels in discussing the structure of a "mega" office. Therefore, it is difficult to recommend a structure for a "mega" office. However, the Workgroup's recommendations on Charges II and III are premised on the understanding that the current district offices would remain in place even if not designated as a "mega" office. In addition, we relied on the Chair's commitment that no one would lose their job as a result of repositioning. The field representatives of the Workgroup strongly recommend that no positions be downgraded.

The Workgroup recommends that the internal structure of the "mega" and district offices maintain comparable functional areas. The Workgroup would recommend that if the "mega" office concept is adopted, there be an office manager position in the "mega" office.

CONCLUSION

The field representatives on the Workgroup recommend that the current number of district offices not be reduced. The Workgroup believes that any restructuring or repositioning should be premised on making the Commission more efficient and effective in enforcing the federal anti-discrimination laws. While the Workgroup has no doubt that some structural changes could be developed which would enhance the effectiveness of the Commission, the case has not been made for the particular repositioning suggested by the Charge.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION JURISDICTIONAL MAP 10 DISTRICTS MARCH 2, 2004



FIELD ACTIVITIES JURISDICTIONAL BOUNDARIES

10 Districts

- 1. ATLANTA MEGA DISTRICT OFFICE - The States of Georgia, North Carolina, and South Carolina.

CHARLOTTE DISTRICT OFFICE - The States of North Carolina and South Carolina.

GREENSBORO LOCAL OFFICE - The State of North Carolina Counties of Alamance, Alleghany, Ashe, Caswell, Davidson, Davie, Forsyth, Guilford, Randolph, Rockingham, Stokes, Surry, Wilkes and Yadkin.

GREENVILLE LOCAL OFFICE - The State of South Carolina.

RALEIGH AREA OFFICE - The State of North Carolina Counties of Beaufort, Bertie, Bladen, Brunswick, Camden, Carteret, Chatham, Chowan, Columbus, Craven, Cumberland, Currituck, Dare, Duplin, Durham, Edgecombe, Franklin, Gates, Granville, Greene, Halifax, Harnett, Hertford, Hyde, Johnston, Jones, Lee, Lenoir, Martin, Nash, New Hanover, Northampton, Onslow, Orange, Pamlico, Pasquotank, Pender, Perquimans, Person, Pitt, Sampson, Tyrrell, Vance, Wake, Warren, Washington, Wayne and Wilson.

SAVANNAH LOCAL OFFICE - The State of Georgia Counties of Appling, Atkinson, Bacon, Ben Hill, Berrien, Brantley, Bryan, Bulloch, Camden, Candler, Chatham, Charlton, Clinch, Coffee, Jeff Davis, Dodge, Echols, Effingham, Emanuel, Evans, Glynn, Irwin, Jenkins, Lanier, Laurens, Liberty, Long, Lowndes, McIntosh, Montgomery, Pierce, Screven, Tattnell, Talfair, Tift, Toombs, Treutlen, Ware, Wayne and Wheeler.

- 2. CHICAGO MEGA DISTRICT OFFICE - The States of Illinois, Iowa, Minnesota, Wisconsin, Kansas, Missouri, North Dakota, South Dakota, and Nebraska.

MILWAUKEE DISTRICT OFFICE - The States of Iowa, Minnesota, Wisconsin, Nebraska, North Dakota, and South Dakota.

MINNEAPOLIS AREA OFFICE - The States of Minnesota, Nebraska, North Dakota, and South Dakota.

ST. LOUIS DISTRICT OFFICE - The States of Kansas, Missouri, and the State of Illinois Counties of Alexander, Bond, Calhoun, Clinton, Greene, Jackson, Jersey, Macoupin, Madison, Monroe, Perry, Pulaski, Randolph, St. Clair, Union and Washington.

KANSAS CITY AREA OFFICE - The State of Kansas and the State of Missouri Counties of Andrew, Atchison, Berry, Barton, Bates, Benton, Buchanan, Caldwell, Carroll, Case, Cedar, Chariton, Clay, Clinton, Cooper, Dade, Daviess, De Kalb, Gentry, Grundy, Harrison, Henry, Hickory, Holt, Jackson, Jasper, Johnson, Lafayette, Lawrence, Linn, Livingston, McDonald, Mercer, Newton, Nodaway, Pettis, Platte, Putnam, Ray, St. Clair, Saline, Sullivan, Vernon and Worth.

3. DALLAS MEGA DISTRICT OFFICE - The States of Oklahoma and State of Texas, except for those Counties listed within the jurisdictional boundaries of the El Paso Area Office (see below).

HOUSTON DISTRICT OFFICE - The State of Texas Counties of Angelina, Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Grimes, Hardin, Harris, Jasper, Jefferson, Liberty, Matagorda, Montgomery, Newton, Orange, Polk, Sabine, San Augustine, San Jacinto, Trinity, Tyler, Walker, Waller and Wharton.

OKLAHOMA CITY AREA OFFICE - The State of Oklahoma.

SAN ANTONIO DISTRICT OFFICE - The State of Texas Counties of Aransas, Atascosa, Bandera, Bastrop, Bee, Bexar, Blanco, Brazos, Brooks, Burleson, Burnet, Caldwell, Calhoun, Cameron, Coke, Comal, Concho, Crockett, De Witt, Dimmit, Duval, Edwards, Fayette, Frio, Gillespie, Goliad, Gonzales, Guadalupe, Hays, Hidalgo, Irion, Jackson, Jim Hogg, Jim Wells, Karnes, Kendall, Kenedy, Kerr, Kimble, Kinney, Kleberg, La Salle, Lavaca, Lee, Live Oak, Llano, McCulloch, McMullen, Mason, Maverick, Medina, Menard, Nueces, Real, Refugio, San Saba, Schleicher, Starr, Sutton, Terrell, Tom Green, Travis, Uvalde, Val Verde, Victoria, Washington, Webb, Willacy, Williamson, Wilson, Zapata and Zavala.

4. INDIANAPOLIS MEGA DISTRICT OFFICE - The States of Indiana, Kentucky, Ohio, and Michigan.

CLEVELAND DISTRICT OFFICE - The State of Ohio.

CINCINNATI AREA OFFICE - The State of Ohio Counties of Adam, Brown, Butler, Clermont, Clinton, Hamilton, Highland, Pike, Ross, Scioto and Warren.

DETROIT DISTRICT OFFICE - The State of Michigan.

LOUISVILLE AREA OFFICE - The State of Kentucky.

5. MEMPHIS MEGA DISTRICT OFFICE - The States of Arkansas, Louisiana, Mississippi, and Tennessee.

LITTLE ROCK AREA OFFICE - The State of Arkansas.

JACKSON AREA OFFICE - The State of Mississippi.

NASHVILLE AREA OFFICE - The State of Tennessee Counties of Anderson, Bedford, Bledsoe, Blount, Bradley, Campbell, Cannon, Carter, Cheatham, Claiborne, Clay, Cocke, Coffee, Cumberland, Davidson, De Kalb, Dickson, Fentress, Franklin, Giles, Grainger, Greene, Grundy, Hamblen, Hamilton, Hancock, Hawkins, Hickman, Houston, Humphreys, Jackson, Jefferson, Johnson, Knox, Lawrence, Lewis, Lincoln, Loudon, McMinn, Macon, Marion, Marshall, Maury, Meigs, Monroe, Montgomery, Moore, Morgan, Overton, Perry, Pickett, Polk, Putnam, Rhea, Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, Smith, Stewart, Sullivan, Sumner, Trousdale, Unicoi, Union,

Van Buren, Warren, Washington, Wayne, White, Williamson and Wilson.

NEW ORLEANS DISTRICT OFFICE - The State of Louisiana.

- 6. MIAMI MEGA DISTRICT OFFICE - The Canal Zone and the States of Alabama and Florida.

BIRMINGHAM DISTRICT OFFICE - The States of Alabama.

TAMPA AREA OFFICE - The State of Florida Counties of Bay, Calhoun, Citrus, Columbia, De Soto, Dixie, Escambia, Franklin, Gadsden, Gilchrist, Gulf, Hamilton, Hardee, Hernando, Hillsborough, Holmes, Jackson, Jefferson, Lafayette, Leon, Levy, Liberty, Madison, Manatee, Okaloosa, Pasco, Pinellas, Polk, Santa Rosa, Sarasota, Suwannee, Taylor, Wakulla, Walton and Washington.

- 7. NEW YORK MEGA DISTRICT OFFICE - The States of Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island and Vermont, the Commonwealth of Puerto Rico and the U.S. Virgin Islands, and the following counties in the State of New Jersey: Bergen, Essex, Hudson, Huterdon, Middlesex, Monmouth, Morris, Passaic, Somerset, Sussex, Union and Warren.

BOSTON AREA OFFICE - The States of Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.

BUFFALO LOCAL OFFICE - The State of New York Counties of Albany, Allegany, Broome, Cattaraugus, Cayuga, Chautauqua, Chemung, Chenango, Clinton, Cortland, Delaware, Erie, Essex, Franklin, Fulton, Genesee, Hamilton, Herkimer, Jefferson, Lewis, Livingston, Madison, Monroe, Montgomery, Niagara, Oneida, Onondaga, Ontario, Orleans, Oswego, Otsego, Rensselaer, St. Lawrence, Saratoga, Schenectady, Schoharie, Schuyler, Seneca, Steuben, Tioga, Tompkins, Warren, Washington, Wayne, Wyoming and Yates.

NEWARK AREA OFFICE - The following counties in the State of New Jersey: Bergen, Essex, Hudson, Huterdon, Middlesex, Monmouth, Morris, Passaic, Somerset, Sussex, Union and Warren.

- 8. PHILADELPHIA MEGA DISTRICT OFFICE - The States of Delaware, New Jersey (except for the 12 counties under the New York/Newark offices), Pennsylvania, West Virginia, Maryland, and Virginia, and the District of Columbia.

BALTIMORE DISTRICT OFFICE - The States of Maryland and Virginia and the District of Columbia.

NORFOLK AREA OFFICE - The state of Virginia Counties of Accomack, Brunswick, Caroline, Charles City, Dinwiddie, Essex, Gloucester, Greensville, Isle of Wight, James City, King and Queen, King George, King William, Lancaster, Lunenburg, Mathews, Mecklenburg, Middlesex, New Kent, Northampton, Northumberland, Nottoway, Prince George, Richmond, Southampton, Surry, Sussex, Westmoreland, York and State of

Virginia Independent Cities of Chesapeake, Colonial Heights, Emporia, Franklin, Hampton, Hopewell, Newport News, Norfolk, Petersburg, Poquoson, Portsmouth, Suffolk, Virginia Beach, and Williamsburg.

PITTSBURGH AREA OFFICE - The State of West Virginia and the State of Pennsylvania Counties of Allegheny, Armstrong, Beaver, Butler, Clarion, Clearfield, Crawford, Elk, Erie, Fayette, Forest, Greene, Indiana, Jefferson, Lawrence, McKean, Mercer, Venango, Warren, Washington and Westmoreland.

RICHMOND AREA OFFICE - The State of Virginia Counties of Albermarle, Alleghany, Amelia, Amhurst, Appomattox, Augusta, Bath, Bedford, Bland, Botetourt, Buchanan, Buckingham, Campbell, Carroll, Charlotte, Chesterfield, Craig, Culpeper, Cumberland, Dickenson, Floyd, Fluvanna, Franklin, Giles, Goochland, Grayson, Greene, Halifax, Hanover, Henrico, Henry, Highland, Lee, Louisa, Madison, Montgomery, Nelson, Orange, Page, Patrick, Pittsylvania, Powhatan, Prince Edward, Pulaski, Rappahannock, Roanoke, Rockbridge, Rockingham, Russell, Scott, Shenandoah, Smyth, Spottsylvania, Tazewell, Washington, Wise, Wythe and State of Virginia Independent Cities of Bedford, Bristol, Buena Vista, Charlottesville, Clifton Forge, Covington, Danville, Fredericksburg, Galax, Harrisonburg, Lexington, Lynchburg, Martinsville, Norton, Radford, Richmond, Roanoke, Salem, South Boston, Staunton and Waynesboro.

WASHINGTON FIELD OFFICE - The District of Columbia and the State of Virginia Counties of Arlington, Clarke, Fairfax, Fauquier, Frederick, Loudoun, Prince William, Stafford, Warren and the State of Virginia Independent Cities of Alexandria, Fairfax City, Falls Church, Manassas, Manassas Park, Winchester, Quantico, Dumfries and Occoquan.

9. PHOENIX MEGA DISTRICT OFFICE - The States of Arizona, New Mexico, Utah, Colorado, Idaho, Montana, and Wyoming, and the State of Texas Counties of Andrews, Bailey, Borden, Brewster, Briscoe, Castro, Childress, Cochran, Cottle, Crane, Crosby, Culberson, Dawson, Dickens, Ector, El Paso, Floyd, Foard, Gaines, Garza, Glasscock, Hale, Hardeman, Haskell, Hockley, Howard, Hudspeth, Jeff Davis, Kent, King, Knox, Lamb, Loving, Lubbock, Lynn, Martin, Midland, Mitchell, Motley, Parmer, Pecos, Presidio, Reagan, Reeves, Scurry, Sterling, Stonewell, Swisher, Terry, Upton, Ward, Winkler and Yoakum.

ALBUQUERQUE AREA OFFICE - The State of New Mexico.

DENVER DISTRICT OFFICE - the States of Colorado, Idaho, Montana, and Wyoming.

EL PASO AREA OFFICE - The State of Texas Counties of Andrews, Bailey, Borden, Brewster, Briscoe, Castro, Childress, Cochran, Cottle, Crane, Crosby, Culberson, Dawson, Dickens, Ector, El Paso, Floyd, Foard, Gaines, Garza, Glasscock, Hale, Hardeman, Haskell, Hockley, Howard, Hudspeth, Jeff Davis, Kent, King, Knox, Lamb, Loving, Lubbock, Lynn, Martin, Midland, Mitchell, Motley, Parmer, Pecos, Presidio, Reagan, Reeves, Scurry, Sterling, Stonewell, Swisher, Terry, Upton, Ward, Winkler and Yoakum.

10. SAN FRANCISCO MEGA DISTRICT OFFICE - The U.S. Possessions of American Samoa, Guam, Northern Mariana Islands, Wake Island, and the States of Hawaii, California,

Nevada, Alaska, Oregon, and Washington.

FRESNO LOCAL OFFICE - The State of California Counties of Alpine, Calaveras, Fresno, Inyo, Kern, Kings, Madera, Mariposa, Merced, Mono, San Benito, San Joaquin, Stanislaus, Tulare and Tuolumne.

LOS ANGELES DISTRICT OFFICE - The State of Nevada, and the State of California Counties within the jurisdictional boundaries of the San Diego Area Office and the State of California Counties of Los Angeles, Orange, Riverside, San Bernardino, San Luis Obispo, Santa Barbara and Ventura.

HONOLULU LOCAL OFFICE - The State of Hawaii.

OAKLAND LOCAL OFFICE - The State of California Counties of Alameda, Amador, Contra Costa, El Dorado, Placer, Sacramento and Solano.

SAN DIEGO AREA OFFICE - The State of California Counties of Imperial and San Diego

SAN JOSE LOCAL OFFICE - The State of California Counties of Monterey, Santa Clara and Santa Cruz.

SEATTLE DISTRICT OFFICE - The States of Alaska, Oregon and Washington.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
II DISTRICTS
JURISDICTIONAL MAP
MARCH 2, 2004



FIELD ACTIVITIES JURISDICTIONAL BOUNDARIES
11 Districts

1. ATLANTA MEGA DISTRICT OFFICE - The States of Georgia, North Carolina, and South Carolina.

CHARLOTTE DISTRICT OFFICE - The States of North Carolina and South Carolina.

GREENSBORO LOCAL OFFICE - The State of North Carolina Counties of Alamance, Alleghany, Ashe, Caswell, Davidson, Davie, Forsyth, Guilford, Randolph, Rockingham, Stokes, Surry, Wilkes and Yadkin.

GREENVILLE LOCAL OFFICE - The State of South Carolina.

RALEIGH AREA OFFICE - The State of North Carolina Counties of Beaufort, Bertie, Bladen, Brunswick, Camden, Carteret, Chatham, Chowan, Columbus, Craven, Cumberland, Currituck, Dare, Duplin, Durham, Edgecombe, Franklin, Gates, Granville, Greene, Halifax, Harnett, Hertford, Hyde, Johnston, Jones, Lee, Lenoir, Martin, Nash, New Hanover, Northampton, Onslow, Orange, Pamlico, Pasquotank, Pender, Perquimans, Person, Pitt, Sampson, Tyrrell, Vance, Wake, Warren, Washington, Wayne and Wilson.

SAVANNAH LOCAL OFFICE - The State of Georgia Counties of Appling, Atkinson, Bacon, Ben Hill, Berrien, Brantley, Bryan, Bulloch, Camden, Candler, Chatham, Charlton, Clinch, Coffee, Jeff Davis, Dodge, Echols, Effingham, Emanuel, Evans, Glynn, Irwin, Jenkins, Lanier, Laurens, Liberty, Long, Lowndes, McIntosh, Montgomery, Pierce, Screven, Tattnall, Talfair, Tift, Toombs, Treutlen, Ware, Wayne and Wheeler.

2. CHICAGO MEGA DISTRICT OFFICE - The State of Illinois, except for those Counties listed within the jurisdictional boundaries of the St. Louis District Office (see below), and the States of Iowa, Minnesota, Wisconsin, North Dakota, South Dakota, and Nebraska.

MILWAUKEE DISTRICT OFFICE - The States of Iowa, Minnesota, Wisconsin, Nebraska, North Dakota, and South Dakota.

MINNEAPOLIS AREA OFFICE - The States of Minnesota, Nebraska, North Dakota, and South Dakota.

3. DALLAS MEGA DISTRICT OFFICE - The State of Texas, except for those Counties listed within the jurisdictional boundaries of the El Paso Area Office (see below).

HOUSTON DISTRICT OFFICE - The State of Texas Counties of Angelina, Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Grimes, Hardin, Harris, Jasper, Jefferson, Liberty, Matagorda, Montgomery, Newton, Orange, Polk, Sabine, San Augustine, San Jacinto, Trinity, Tyler, Walker, Waller and Wharton.

SAN ANTONIO DISTRICT OFFICE - The State of Texas Counties of Aransas, Atascosa, Bandera, Bastrop, Bee, Bexar, Blanco, Brazos, Brooks, Burleson, Burnet, Caldwell, Calhoun, Cameron, Coke, Comal, Concho, Crockett, De Witt, Dimmit, Duval, Edwards, Fayette, Frio, Gillespie, Goliad, Gonzales, Guadalupe, Hays, Hidalgo, Irion, Jackson, Jim Hogg, Jim Wells, Karnes, Kendall, Kenedy, Kerr, Kimble, Kinney, Kleberg, La Salle, Lavaca, Lee, Live Oak, Llano, McCulloch, McMullen, Mason, Maverick, Medina, Menard, Nueces, Real, Refugio, San Patricio, San Saba, Schleicher, Starr, Sutton, Terrell, Tom Green, Travis, Uvalde, Val Verde, Victoria, Washington, Webb, Willacy, Williamson, Wilson, Zapata and Zavala.

- 4. INDIANAPOLIS MEGA DISTRICT OFFICE - The States of Indiana, Kentucky, Ohio, and Michigan.

CLEVELAND DISTRICT OFFICE - The State of Ohio.

~~CINCINNATI AREA OFFICE - The State of Ohio Counties of Adam, Brown, Butler, Clermont, Clinton, Hamilton, Highland, Pike, Ross, Scioto and Warren.~~

DETROIT DISTRICT OFFICE - The State of Michigan.

LOUISVILLE AREA OFFICE - The State of Kentucky.

- 5. MEMPHIS MEGA DISTRICT OFFICE - The States of Louisiana, Mississippi, and Tennessee.

JACKSON AREA OFFICE - The State of Mississippi.

NASHVILLE AREA OFFICE - The State of Tennessee Counties of Anderson, Bedford, Bledsoe, Blount, Bradley, Campbell, Cannon, Carter, Cheatham, Claiborne, Clay, Cocke, Coffee, Cumberland, Davidson, De Kalb, Dickson, Fentress, Franklin, Giles, Grainger, Greene, Grundy, Hamblen, Hamilton, Hancock, Hawkins, Hickman, Houston, Humphreys, Jackson, Jefferson, Johnson, Knox, Lawrence, Lewis, Lincoln, Loudon, McMinn, Macon, Marion, Marshall, Maury, Meigs, Monroe, Montgomery, Moore, Morgan, Overton, Perry, Pickett, Polk, Putnam, Rhea, Roane, Robertson, Rutherford, Scott, Sequatchie, Sevier, Smith, Stewart, Sullivan, Sumner, Trousdale, Unicoi, Union, Van Buren, Warren, Washington, Wayne, White, Williamson and Wilson.

NEW ORLEANS DISTRICT OFFICE - The State of Louisiana.

- 6. MIAMI MEGA DISTRICT OFFICE - The Canal Zone and the States of Alabama and Florida.

BIRMINGHAM DISTRICT OFFICE - The States of Alabama.

TAMPA AREA OFFICE - The State of Florida Counties of Bay, Calhoun, Citrus, Columbia, De Soto, Dixie, Escambia, Franklin, Gadsden, Gilchrist, Gulf, Hamilton, Hardee, Hernando, Hillsborough, Holmes, Jackson, Jefferson, Lafayette, Leon, Levy, Liberty, Madison, Manatee, Okaloosa, Pasco, Pinellas, Polk, Santa Rosa, Sarasota,