

U.S. Equal Employment Opportunity Commission  
Office of the Inspector General  
Evaluations Program

# Evaluation of EEOC's Management of Private Sector Customer Service

*OIG Report Number: 2021-001-EOIG*

*October 18, 2022*



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## Glossary of Terms

CP	Charging parties
GAO	Government Accountability Office
IIG	Information Intake Group
IIR	Intake Information Representatives
IVR	Interactive Voice Response
PCP	Potential charging parties

## EXECUTIVE SUMMARY



### ***WHY WE DID THIS EVALUATION***

Federal government agencies have always faced challenges with delivering good customer service. President Biden signed Executive Order 14058, “*Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*,” in December 2021 which hold agencies accountable for designing and delivering services with a focus on the actual experience of people whom it is meant to serve and reinforces two previous Executive Orders related to federal customer service. EEOC has several customer services channels. The Information Intake Group receives thousands of calls and emails from the public each year. The purpose of this evaluation is to assess the Agency’s strategy and efforts to achieve customer service efficiency and measure customer satisfaction.

### ***Evaluation of EEOC’s Management of Private Sector Customer Service (2021-001-EOIG)***

#### **WHAT WE FOUND**

We found that the Agency has not established a common customer service vision. The Agency does not have a cohesive strategy that connects all its customer service channels. The Information Intake Group (IIG) staff have customer service performance measures included in their performance plans; however, it is unclear how meeting these standards would achieve the Agency’s intended customer service goals. We also found that Equal Employment Opportunity Commission (EEOC) customer service standards are not publicly available, nor does the Agency collect feedback from its customers. As a result, EEOC cannot measure its progress or make improvements to its customer service efforts.

We found that the IIG has improved its call hold time over the last two years, but it remains above industry standards at 23 minutes. In fiscal year (FY) 2021, the IIG’s call abandonment rate was 36 percent. Over the last five years, more customers are contacting the Agency via email and wait an average of eight days to receive a response which does not meet the IIG’s standard of 3 days. We also found that the IIG has a robust quality assurance program for incoming calls, but not for responses sent to customers via email.

The IIG collects information on approximately 30,000 customer inquiries each year, known as an 846, and this information is sent to the district offices. We found that there are no specific criteria for generating an 846 and the districts find most of these files duplicative. The returns on investment to address 846 inquiries is unclear.

We issued the following seven recommendations to help improve EEOC's management of private sector customer service:

1. EEOC should develop a customer service plan to include establishing goals and objectives, developing performance metrics that target the goals, and measuring performance against the goals. This plan must include goals and metrics for the IIG.
2. EEOC must manage customer expectations by making customer service standards available to the public.
3. The IIG must collect customer feedback and use the data to improve customer service efforts.
4. The IIG should explore and implement ways to reduce the call hold time and email response time for customers.
5. The IIG should design and implement a quality assurance program for customer emails.
6. OFP should assess the usefulness of generating 846 inquiries (i.e.; return on investment) and assess whether automatic close out in the system is more practical,
7. OFP should establish guidelines for generating 846 inquiries and other information sharing between the IIG and district offices.

# INTRODUCTION

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The EEOC is the federal agency responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information. The EEOC is a bipartisan commission composed of five presidentially appointed members, which include a Chair, a Vice Chair, and three Commissioners. The Chair is responsible for the administration and implementation of policy and the EEOC's financial management and organizational development. The Vice Chair and the Commissioners equally participate in developing and approving EEOC policies, issuing charges of discrimination where appropriate, and authorizing the filing of lawsuits. Also, the Agency provides leadership and guidance to federal agencies on all aspects of the federal government's equal employment opportunity program.

## Background

The Government Performance and Results Modernization Act of 2010 requires that agency performance plans measure progress toward customer service goals, including quality, timeliness, and satisfaction. In March 2018, the Office of Management and Budget announced a cross-agency priority goal to improve customer experiences with federal services. According to the Government Accountability Office (GAO), providing good customer service has been a long-standing challenge for federal agencies. Several recent GAO reports address customer service. These reports, including a summary report issued in 2019, found significant deficiencies in many aspects of customer service.<sup>1</sup> GAO notes that many federal agencies do not:

- Set and make public measurable customer service goals,
- measure progress toward meeting those goals,
- maintain formal feedback mechanisms to make changes, or
- make information about the discrimination charge process easily available to the public.

More recently, the vision for President Biden's Management Agenda identifies three priority areas for transformation, the second of which addresses delivering excellent Federal services and improved customer service. To help accomplish this goal, President Biden signed Executive Order 14058, "*Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government*," in December 2021. The Order states that "Government must be held accountable for designing and delivering services with a focus on the actual experience of people

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<sup>1</sup>Tax Administration – Opportunities Exist to Improve Monitoring and Transparency of Appeal Resolution Timeliness, (GAO-18-659); Airline Consumer Protections – Additional Actions Could Enhance DOT's Compliance and Education Efforts (GAO-19-76); Managing for Results: Selected Agencies Need to Take Additional Efforts to Improve Customer Service, (GAO-15-84).

whom it is meant to serve.” In addition, the Order references two Executive Orders issued under previous administrations that relate to federal customer service. Executive Order 12862<sup>2</sup> sets customer service standards requiring agencies that provide significant services directly to the public to identify and gather feedback from customers; establish service standards and measure performance against those standards; and benchmark customer service standards against the best customer experience provided in the private sector.<sup>3</sup> Section two of Executive Order 13571 further required agencies to develop a customer service plan to address how agencies will provide services in a manner that seeks to streamline service delivery and improve the experience of its customers.<sup>4</sup> The President’s Management Agenda and Executive Order 14058 reinforce the government’s commitment to improving its customer service to the public.

### **Intake Information Group (IIG)**

The Office of Field Programs manages customer service for potential charging parties (PCPs), charging parties (CPs), and respondents.<sup>5</sup> EEOC’s IIG serves as the first line of contact for many citizens and is accessible via toll-free phone line (1-800-669-4000) and e-mail (info@eeoc.gov). The purpose of the IIG is to provide information about employment discrimination to the public, respond to general inquiries, and direct PCPs to the Public Portal. Customers are referred to the Public Portal to submit charge inquiries, request intake interviews with EEOC, and to submit and receive documents and messages regarding their charge of discrimination. The IIG usually has 40-50 federal employees comprised of Supervisory Intake Information Representatives (IIRs), Lead IIRs, and Contact Representatives (IIRs) who work remotely around the country. As shown in the chart below, staffing levels have fluctuated slightly over time.

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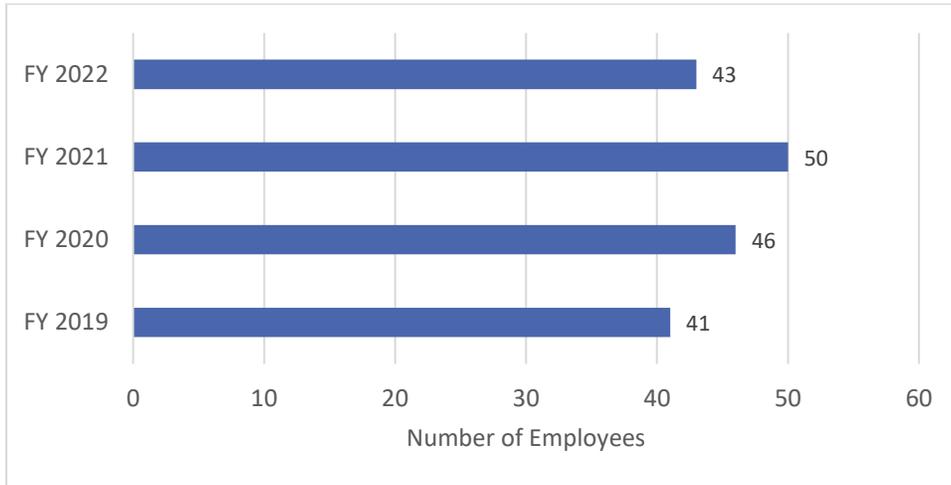
<sup>2</sup> EO 12862, *Setting Customer Service Standards*, September 11, 1993.

<sup>3</sup> According to EO 12862, best in business shall mean the highest quality of service delivered to customers by private organizations providing a comparable or analogous service.

<sup>4</sup> EO 13571, *Streamlining Service Delivery and Improving Customer Service*, April 27, 2011.

<sup>5</sup> Potential charging parties are customers who are inquiring about a claim of discrimination and have not yet filed charges. Charging parties has formally filed charge of discrimination against an organization. A respondent is the organization the charges are filed against.

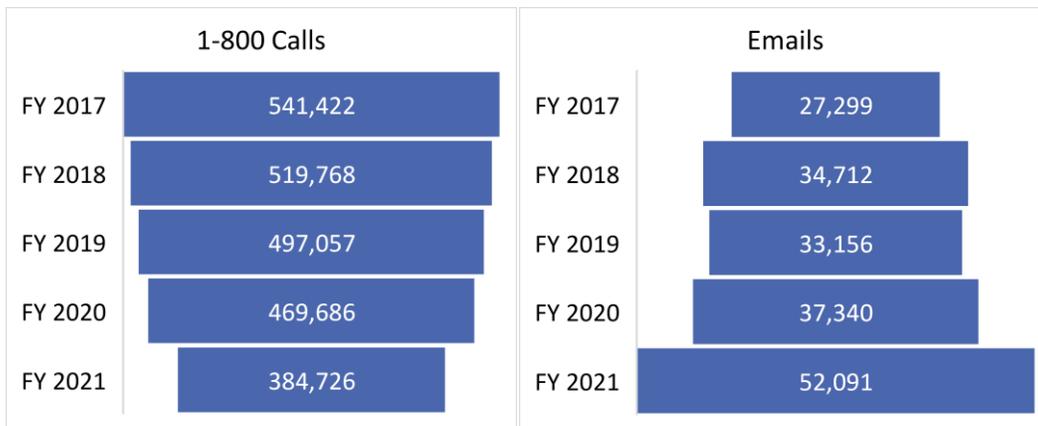
**Chart 1. Number of IIG Staff (as of August 5, 2022) \***



Source: IIG, \*IIG has ten new employees in the intake process.

During the last five fiscal years, the IIG has received approximately 500,000 calls or more each year. In fiscal year 2020, the top five reasons for calling the IIG include: 1) intake and charge filing inquiries, 2) EEOC overview, 3) questions about case status, 4) federal sector process inquiries, and 5) customer complaints. The total number of incoming calls received has decreased by 29 percent over the past five years. However, the number of customers contacting the Agency via email has increased.

**Chart 2. Number of IIG Calls and Emails (Fiscal Years 2017-2021)**



Source: IIG

The decrease in calls may be attributed to two factors: 1) implementation of the Public Portal where customers can initiate an inquiry on their own and 2) customers choosing to use other methods such as email to contact the Agency.

## **Methodology**

We conducted this evaluation from March 2021 through May 2022 in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation* (Blue Book, December 2020). The standards require that we plan and perform the evaluation to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and recommendations.

## **Objectives and Criteria**

The purpose of this evaluation is to assess the Agency's strategy and efforts to achieve customer service efficiency and measure customer satisfaction. Specifically, we sought to:

1. Assess the extent to which EEOC has established customer service standards and is measuring performance against these standards.
2. Determine how EEOC is communicating customer service standards to the public.
3. Assess the extent to which EEOC collects customer feedback and uses this data to improve customer service.
4. Identify opportunities for improvements in the management of customer service channels included in this evaluation.

The following criteria were used for this evaluation:

- President Biden's Management Agenda
- Executive Order 14058
- Executive Order 12862
- Executive Order 13571
- IIG customer service performance standards
- Private sector customer service standards for call centers

## **Scope**

We examined EEOC's customer service management activities as they apply to private sector PCPs, CPs, and respondents who interact with staff at EEOC headquarters. We did not examine customer service in the field offices. The scope focused on goals, performance measures, results, and customer feedback. The evaluation included customer service management activities for the 1-800 telephone service, central email service, and initially, the Public Portal. After collecting data and conducting some preliminary analysis for the Public Portal, OIG management determined that evaluation of the Public Portal should be moved and included in an upcoming contractor led evaluation specifically related to EEOC's portals. We will share our Public Portal data and analysis with the contractor when appropriate.

## **Data Collection and Analysis**

We requested IIG call and email data from FY 2017- FY 2021. Call data included the number of calls answered, IIR talk time, after call work, hold times, the nature of the call, and outcome.

Email data included the number of emails handled, average response time, nature of the email, and the outcome. We also requested customer service goals and metrics, customer satisfaction data, and call monitoring information.

### ***Interviews***

We interviewed 19 IIG staff, including the IIG Manager, IIG Program Director, Supervisory IIRs, Lead IIRs, and Contract Representatives (IIRs). We obtained information about their roles and responsibilities, training, quality assurance efforts, and perceptions of customer service.

We interviewed Office of Field Programs management and representatives from five EEOC Districts: Charlotte, Houston, Los Angeles, Phoenix, and San Francisco. We obtained information about how the districts process information shared from the IIG. Specifically, we asked how 846 inquiries are shared, handled, and perceived by district staff.

We conducted four interviews with EEOC staff who have responsibilities related to the Public Portal. As stated earlier, this information will be included in the subsequent evaluation about EEOC portals.

### ***Document and Website Review***

We reviewed call flows used by IIRs when assisting customers, IIG staff performance plans, documents related to quality assurance activities, and contract documents.

We also reviewed the websites of seven federal agencies that typically receive inquiries from the public to determine if their customer service standards were available to the public:

1. Department of Education – [www.ed.gov](http://www.ed.gov)
2. Department of Health and Human Services – [www.hhs.gov](http://www.hhs.gov)
3. Housing and Urban Development – [www.hud.gov](http://www.hud.gov)
4. Internal Revenue Service - [www.irs.gov](http://www.irs.gov)
5. Small Business Administration – [www.sba.gov](http://www.sba.gov)
6. Social Security Administration – [www.ssa.gov](http://www.ssa.gov)
7. Veterans Administration – [www.va.gov](http://www.va.gov)

# RESULTS

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## **FINDING 1. EEOC lacks a comprehensive customer service plan.**

EEOC provides essential services to those who feel they have been discriminated against in the workplace. Customers often feel frustrated when contacting the Agency which makes it essential to deliver a positive customer service experience. As stated earlier, President Biden’s Executive Order (EO) 14058, issued in December 2021, reinforces executive orders related to customer service issued by previous administrations; specifically, EO 12862 and EO 13571. We found that EEOC’s customer service efforts lack three elements recommended for federal agencies: 1) setting customer service goals; 2) making customer service standards publicly available; and 3) gathering customer feedback.

### Customer service goals are unclear and performance metrics are fragmented.

We found that the Agency has not established a common customer service vision. The Agency does not have a cohesive strategy that connects all its customer service channels. According to a Accenture Federal Services report on Federal contact centers, in the absence of high-level customer service goals and objectives, offices tend to deliver customer service in silos.<sup>6</sup> As a result, offices may find themselves working at cross purposes that may not align with those of the contact center which, in many ways, serves at the front door to the Agency. To achieve these shared objectives and break through those organizational silos, senior agency leaders need to harmonize the day-to-day activities and investments of all its customer service channels.

We also found that IIG management and employees have customer service performance measures included in their performance plans which was recommended by the Government Performance and Reporting Act of 2010. For example, customer service metrics for Contact Representatives include average call hold time, average talk time, time away from their desk, and regular quality assurance reviews. However, it is unclear how meeting these standards would achieve the Agency’s overall customer service goals.

In 2014, GAO released a report entitled “Managing for Results: Selected Agencies Need to Take Additional Efforts to Improve Customer Service” which looked at customer service in five federal agencies. GAO’s Managing Director of Strategic Issues was interviewed about the report and stressed the importance of setting customer service goals and developing strategies to meet those goals. EEOC has not defined what satisfactory customer service means for offices that interact with the public. Therefore, whatever customer service strategies or standards exist cannot assess progress towards customer service goals or identify opportunities for improvement.

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<sup>6</sup> “Answering the Call? The Case for Transforming Federal Contact Centers.” (May 13, 2022), Accenture Federal Services.

Customer service standards are not consistently communicated to the public.

We found that EEOC does not typically set customer service expectations for the public. According to EO 13571, each agency should publish its customer service plan. The GAO, in its 2014 report about Federal customer service listed “customer service standards that are easily publicly available” as a key element. EEOC’s website does not set expectations for customers who plan to contact the IIG via phone or email. On June 30, 2022, the OIG accessed the EEOC website which provides IIG contact information and there were no customer service standards included on this page. When emails are sent to [info@eoc.gov](mailto:info@eoc.gov), the auto response does not provide a timeframe for when customers should expect to receive a response. Exhibit 1 shows the response we received when submitting an online inquiry.

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### **Exhibit 1. Response Provided to Customers Who Contact EEOC via Email**

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#### **Response**

Thank you for contacting the United States Equal Employment Opportunity Commission. This automated response confirms receipt of your inquiry and is not intended to address your specific questions. For those of you wishing to file a charge of employment discrimination, please note that there is a time limit of either 180 or 300 days to file a charge, depending on a number of factors. If you want to begin the process, you can use our online assessment tool at [US EEOC](#) . You can not file a charge via email. We will respond to your specific questions as quickly as possible.

*Source: [info@eoc.gov](mailto:info@eoc.gov) - Incident: 220630-000307*

During our fieldwork, customers who were placed on hold after calling the IIG had no idea how much time it would take for someone to answer their call. In addition, the IIG’s Interactive Voice Response (IVR) system did not inform the customer that IIR staff cannot make investigative appointments. IIRs interviewed by the OIG stated that about half the customers they speak with ask for help making appointments at some point during the call and many times that’s the primary reason for their call. After discussing some of these issues with IIG management, the IIG added these features to the new IVR that launched on June 2, 2022.

We also reviewed the websites for seven federal agencies that typically receive inquiries from the public to determine if customer service standards or expectations are provided to the public. We found only one that set expectations for the public. In Exhibit 2 below, the Internal Revenue Service post average call wait times on their website.

## Exhibit 2. IRS Website Contact Page

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### IRS phone number - Call Wait Times

#### Filing Season

(January - April)

- Telephone service wait times can average 13 minutes. Some telephone service lines may have longer wait times.
- Telephone service wait times are higher on Monday and Tuesday, during Presidents Day weekend and around the April tax filing deadline.

#### Post-Filing Season

(May - December)

- Telephone service wait times can average 19 minutes. Some telephone service lines may have longer wait times.
- Telephone service wait times are generally higher on Monday and Tuesday.

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Source: [www.irs.gov](http://www.irs.gov) - Accessed July 28, 2022

Better managing expectations may go a long way in preventing customers from becoming frustrated with contacting the Agency.

EEOC does not collect feedback from private sector customers.

As noted in EO 13571, federal agencies should establish mechanisms to solicit customer feedback and use that feedback to make service improvements. We found that EEOC does not gather any feedback from IIG customers. The IIG Director told the OIG that most of the work to build a new telephony system, which included the new IVR system, is complete. However, the “After-Call Customer Service Surveys,” another feature of the new system, has not been implemented yet. The anticipated launch date is in late FY 2022.

#### **Recommendations**

1. EEOC should develop a customer service plan to include establishing goals and objectives, developing performance metrics that target the goals, and measuring performance against the goals. This plan must include goals and metrics for the IIG.
2. EEOC must manage customer expectations by making customer service standards available to the public.
3. The IIG must collect customer feedback and use the data to improve customer service efforts.

**FINDING 2. Customer service response times have improved but remain slow and far exceed private sector standards.**

EEOC customers experience long wait times prior to speaking with an IIG representative.

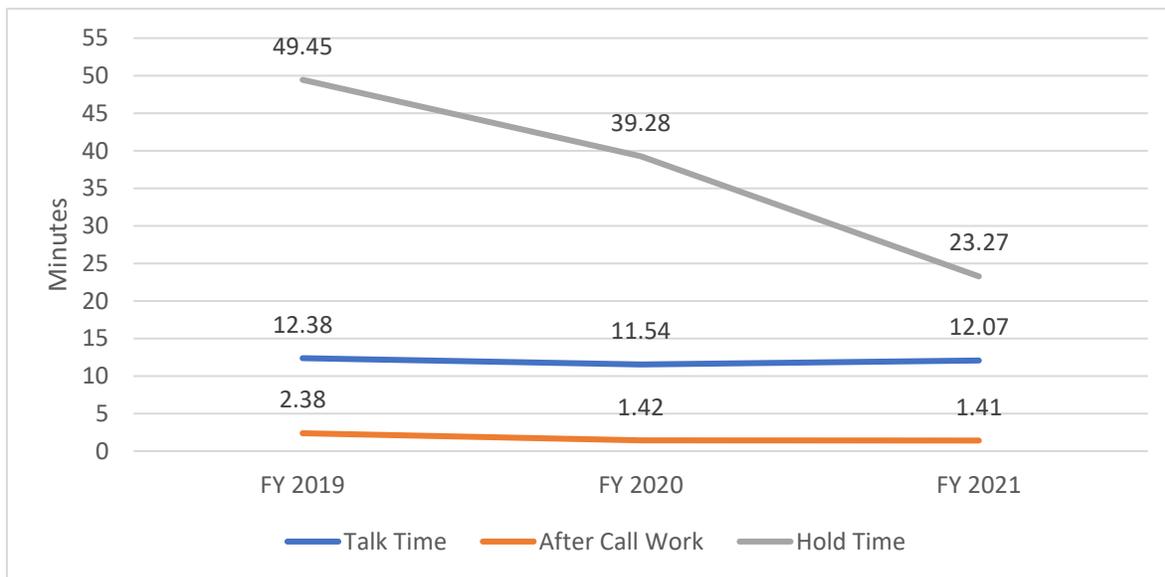
The decrease in the total number of calls made to the IIG may be attributed to the implementation of the Public Portal. However, the number of incoming calls answered by the IIG increased by 40,000 (36 percent) over the last three fiscal years. Although the IIG answered more calls, customers continue to experience lengthy hold times. In FY 2019 customers waited an average of 49 minutes to talk with an IIG representative. We found that hold times dropped to 39 minutes in FY 2020 and 23 minutes in FY 2021.<sup>7</sup> The chart below shows averages for hold times and a few other call metrics.

**Table 1. IIG Calls Answered**

FY	# of Calls
2019	107,624
2020	126,472
2021	147,218

Source: IIG

**Chart 3. Averages for IIG Customer Call Metrics**



Source: IIG

We researched private sector industry standards for call centers. Several companies which specialize in call center performance indicated that the private sector industry standard for call center service levels is 80/20: answering 80 percent of calls in 20 seconds. Whether or not this standard is realistic may depend on the type of call center, the nature of the calls, and the number of contact representatives. Even if this standard is deemed not realistic for EEOC, no standard has been established to determine whether customer needs are being met in the most efficient

<sup>7</sup> The hold times for Spanish speaking callers are slightly better at 19 minutes.

manner possible. Most customers, whether calling a private company or federal agency, would consider a 20-minute hold time unacceptable.

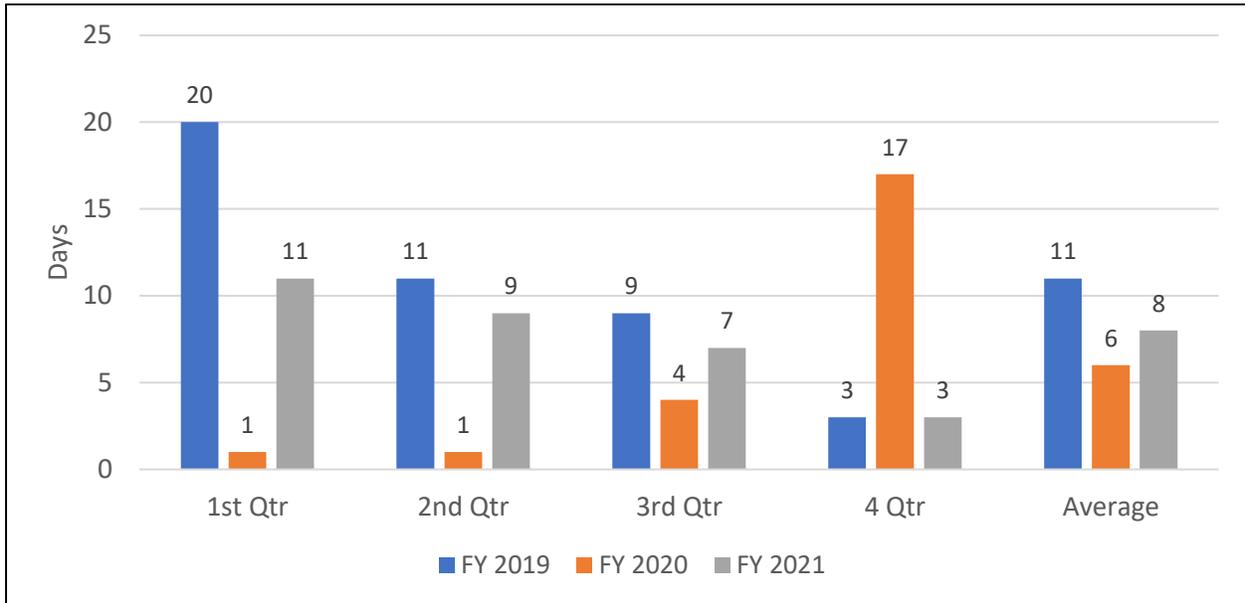
One of the performance metrics used by many call centers is “call abandonment rate.” This metric calculates the percentage of callers who hang up prior to speaking with a call center representative. The industry standard for an acceptable abandonment rate is 5-8 percent. In FY 2021, the IIG’s abandonment rate was 36 percent. According to the IIG Director, calls are abandoned for several reasons. For example, customers may decide to hang up and use the Public Portal, which is preferable, or the caller receives the answer to their question from the IVR information provided. Even if half the callers hang up because the IVR provided them with the information they needed (36 percent divided by 2), that still leaves an abandonment rate of 18 percent which far exceeds private sector standards.

On average, IIG staff are on the phone for 12 minutes assisting customers. The industry standard for this metric varies depending on the nature of the work. IIG management believes 12 minutes is good due to the nature of the calls. According to IIG management, attempting to get calls down to less than 12 minutes would compromise customer service quality. After each call, the IIRs perform administrative activities, which entails entering information about the call into the system. The IIRs complete after call work in under 2 minutes which exceeds the industry standard of 6 minutes.

The IIG does not meet its own standard for responding to customer emails.

If the trend continues, the IIG will receive even more customer emails in the coming years. The IIG received almost 15,000 (39 percent) more emails in FY 2021 than in FY 2020. We found that email response times were generally trending down in FY 2021, but the average of 8 days is still well above the IIG standard of 3 days. Chart 4 shows that the longest response times were during the first quarter of FY 2019 and the fourth quarter of FY 2020. These spikes in the data may be the result of extenuating circumstances such as the government shutdown and the beginning of the COVID pandemic.

**Chart 4. Average Email Response Times by Quarter**



Source: IIG

Timely email responses are important because they foster a sense of trust between the sender and the recipient. Customers are opting to use digital methods more to contact the Agency. Therefore, the IIG needs to develop ways to make digital communication more efficient.

**Recommendation**

4. The IIG should explore and implement ways to reduce the call hold time and email response time for customers.

**FINDING 3. The IIG maintains an adequate quality assurance program for incoming calls, but not emails.**

Customer service quality assurance is the practice of monitoring the quality of customer interactions. We found that the IIG uses a few quality assurance methods for its contact representatives when responding to customer calls. These methods are designed to ensure that contact representatives provide the same basic services, perform the same functions, and respond to inquiries in similar ways regardless of their geographic location. To provide consistency in the customer service provided, the IIG developed call flows, conducts call reviews, and holds calibration sessions for supervisors.

Call flows are documents or scripts that guide contact representatives through a call. There are several different call flows depending on the nature of the call and the customer’s needs. Each caller is asked a couple of general questions and if necessary, questions to determine whether their issue is covered under the laws that EEOC enforces. According to the IIG Director, the gold

standard for calls is to direct the customer to the Public Portal. We found the call flows to be logical, concise, and easy to follow. The documents allow the IIR to get to the root of the call quickly and directs the IIR to additional resources when needed.

Call monitoring took place in the field prior to the IIG’s creation and has since evolved into a more robust program. Currently, the IIG has a Quality Specialist who administers the quality assurance program for the call center. Specifically, recorded calls are given a randomly generated number by which one or two are selected for each IIR. Supervisors are given the recordings in the zip file, listen to the recordings, and use a score sheet to assess the call. The score sheet assesses three categories: accuracy of information provided to the customer, accuracy of information captured in the system, and soft skills such as friendliness, empathy, maintaining control of the call, and professionalism. (See Appendix A) The data from the score sheets is analyzed to identify areas where additional training is needed. Table 2 shows the IIG call monitoring activity over the last five years.

**Table 2. IIG Call Monitoring (2017-2021)**

Year	# Calls Sampled	# Calls Assessed	Process Activity	IIRs *
2017	124	N/A	Call monitoring was the responsibility of the Field Office supervisors. IIRs did not report to the IIG directly.	22
2018	1549	242	IIR consolidation was completed and reported directly to the IIG. IIG Supervisors monitored calls and provided feedback to each IIR on their team. Two calls for each IIR per week were submitted to the Supervisors with a goal of monitoring each IIR once per week.	20
2019	1593	325	Supervisors monitored calls and provided feedback to each IIR on their team. Two calls for each IIR per week were submitted to the Supervisors with a goal of monitoring each IIR once per week.	27
2020	1166	352	Supervisors monitored calls and provided feedback to each IIR on their team. During the middle of 2020, the supervisors received only one randomly selected call recording per IIR each week to review instead of the usual two (this practice continues to date).	23
2021	687	499	Third supervisor hired; 72 percent of calls submitted for monitoring were scored and reviewed with each IIR	28

\* average active IIR total (w/o ASL & Leads)

Source: IIG

Calibration sessions are used to measure the correctness of the process and ensure each supervisor manages their call reviews in a similar way. During the calibration process, the IIG manager, Quality Specialist, Training Specialist, and Supervisors listen to randomly selected recordings of inbound calls and individually score the call. After the scoring is completed, the results are compiled onto a “master scorecard” which is determined by the Supervisor of the IIR whose recording is being assessed. The Quality Specialist also calculates the statistical variance to determine the level of calibration. Typically, a standard deviation between 0-3 around the mean is considered acceptable. The group discusses the results and any differences in scoring.

In contrast to the IIG’s extensive call monitoring efforts, no quality assurance activities are performed on email responses. Customers who contact the IIG via email about a topic should receive similar responses to similar inquiries no matter who writes the response. Emails should be assessed based on comparable topics as calls such as accuracy of information provided and soft skills. Since the IIG’s email volume is increasing, ensuring the quality of the customer responses is integral to the Agency customer service efforts.

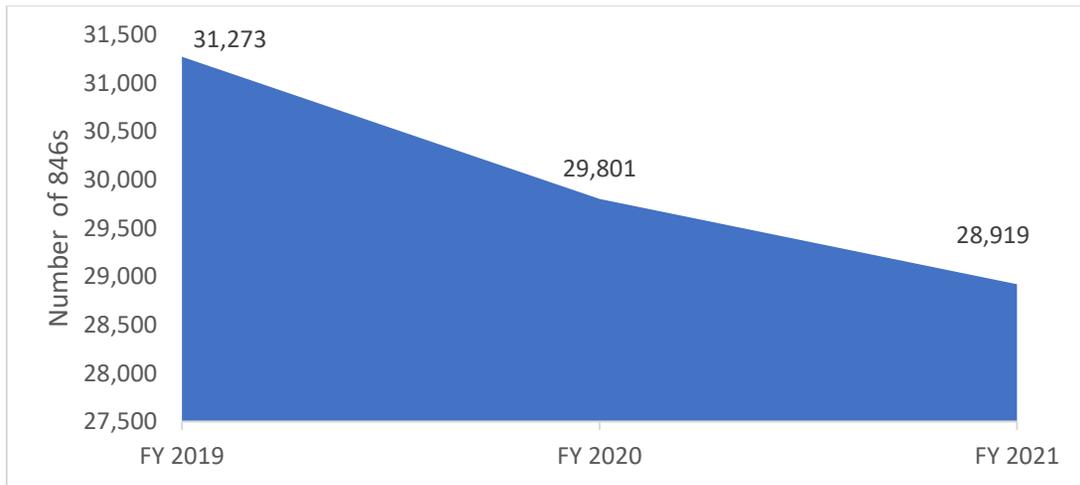
***Recommendation***

5. The IIG should design and implement a quality assurance program for customer emails.

**FINDING 4. Information shared between the IIG and district offices is often duplicative, and its usefulness is unclear.**

When customers call into the IIG, the objective is to direct customers to the public portal. If the customer expresses hesitation about filing charges or using the public portal, the IIG provides the customer with information about other ways they can file charges. These customer inquiries are entered into the system and are known as an “846.” On average, the IIG generates approximately 30,000 846 inquiries each year.

**Chart 6. Number of 846 Inquiries**



*Source: Office of Field Programs*

In the past, if no action was taken by the potential charging party or no interview was scheduled, then the system would close out the inquiry. Currently, the 846 files are uploaded at the end of each day and sent to the appropriate district office. We found there are no specific criteria for generating an 846 and district representatives find many of these files duplicative.

Each district has its own procedures for handling 846 inquiries. Typically, each district assigns someone to review the 846 inquiries, which entails searching the portal for the customer’s name to determine if they have already created an inquiry using the Public Portal. If the customer has not created an inquiry in the portal, then the district representative either calls them or sends out a letter with information about how to file a charge. We spoke to representatives from five districts and four of them noted that a significant portion of the 846 inquiries are duplicative and are already in the system. One district representative we spoke with said, “846s are redundant because they cause more work at the field level.” Another said, “we’ve found there to be a lot of duplicates in the 846s.”

There is no way to tell whether a customer who is the subject of the 846 acts based on a phone message left by district staff or a letter sent by mail. Therefore, the return on investment to address the 846 inquiries is unclear. The Agency needs to establish clearer parameters for information sharing between IIG and the districts so that the information provided does not result in lost time that can be spent assisting potential charging parties who are actively taking steps to move their cases forward.

***Recommendations***

6. OFP should assess the usefulness of generating 846 inquiries (i.e.; return on investment) and assess whether automatic close out in the system is more practical,

7. OFP should establish guidelines for generating 846 inquiries and other information sharing between the IIG and district offices.

## Conclusions

According to a report by Accenture Federal Services entitled, “*Answering the Call? The Case for Truly Transforming Federal Contact Centers*,” the mark of true contact center transformation and customer experience improvement is when a call is not made because the customer already has the information they need.<sup>8</sup> Due to the decrease in the number of incoming calls to the IIG, the Agency may be on this trajectory. However, the absence of an EEOC customer service plan means that customer service is being provided in silos throughout the agency and there is no way to measure whether customer service provided is acceptable. The IIG has established customer service metrics in staff performance plans but they are not linked to customer service goals set by the Agency.

Customer response times exceed private sector standards and, with respect to the increasing email inquiries, exceeds the IIG’s standards. Feedback from customers is widely seen as the best way to improve customer service and the IIG currently does not collect this data. The information that is collected from customers and shared with the district offices is often duplicative and uses already limited district resources to resolve. To prevent this, the Agency must determine what information should be collected and shared with the district offices.

In order to improve customer service, the Agency must define acceptable customer service, set goals, measure progress towards the goals, and listen to its customers.

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<sup>8</sup> See footnote 5

# APPENDIX I – IIG Call Monitoring Assessment Form

## EEOC IIG Transaction Assessment Form

Page 1 of 2

Accuracy of Information Provided		
	Scoring Range	Score
Uses Intro & Closing Scripts Appropriately	2	10
Provides Time Limits for work related calls (FCRI)	2	20
Identifies correct nature of call & follows the appropriate process	2	10
Uses Knowledge database & reference materials appropriately (FCRI)	2	20
Provides Approved Content Only	2	20
Responded to all of callers questions	2	10
Provided "Next Step" information to caller? (FCRI)	2	5
Refers Caller to the Appropriate Agency (FCRI)	2	5
<b>AIP Total Percentage</b>		<b>100.00</b>
Accuracy of Information Captured		
	Yes/No	Score
<b>Captures Caller's Information</b>		
Name	YES	7.5
Address (including state and zip)	YES	7.5
Telephone Number	YES	7.5
Email Address	YES	7.5
<b>Verifies Caller's Information (accuracy &amp; spelling)</b>		
Name (FCRI)	YES	2.5
Address (FCRI)	YES	2.5
Telephone Number (FCRI)	YES	2.5
Email Address	YES	2.5
<b>Checked Appropriate Boxes Before Closing</b>		
Name Prefix	YES	2.5
Demographics when questionnaire requested	YES	5
Topic Chosen Correct (based on scripts used)	YES	2.5
Queue Chosen Correct	YES	5
Channel with Language Chosen Correct	YES	2.5
Status Chosen Correct	YES	5
Disposition Chosen Correct	YES	5
<b>Accurately Captured Caller's Questions</b>		
Bases and Issue	YES	5
Employer's County or Zip Code (when necessary)	YES	5
Employer's State	YES	2.5
Field Office	YES	5
Date of Alleged Incident	YES	5
Sector	YES	2.5
Flat File (when necessary)	YES	5
Messages Standard Template	YES	2.5
<b>AIC Total Percentage</b>		<b>100.00</b>
Soft Skills		
	Scoring Range	Score
Pleasant, Polite, Friendly, Used Proper Tone	2	5.5
Demonstrated Willingness to Help	2	5.5
Demonstrated Empathy with the Caller	2	5.5
Defused Emotional/Angry Callers	2	5.5
Maintained Control of the Call	2	10
Was Articulate and Used Grammar	2	5.5
Displayed Professionalism	2	5.5
Communicated Clearly (FCRI)	2	5.5
Delivered Information at a Steady Pace	2	5.5
Listened Actively (FCRI)	2	10
Asked Probing Questions (FCRI)	2	10
Greeted Promptly Using the EEOC and Providing IIR Name	2	5
Showed Proper Hold Protocol	2	5.5
Transferred the Call Appropriately	2	10
Used the Appropriate Script for Closing	2	5.5
<b>SS Total Percentage</b>		<b>100.00</b>
<b>Overall Performance Score:</b>		<b>100.00</b>
<b>Corrective Action Required?</b>		<b>No</b>

Version: 042109

US EEOC

Intake Information Group

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## APPENDIX II – Agency’s Formal Responses to OIG Recommendations

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OIG Recommendations and IIG Formal Responses/Observations Stating Concurrence or Non-Concurrence:

### Recommendation #1

EEOC should develop a customer service plan to include establishing goals and objectives, developing performance metrics that target the goals, and measuring performance against the goals. This plan must include goals and metrics for the IIG.

***IIG Response to Recommendation #1: The IIG concurs that the EEOC should develop a formal overall customer service plan as described in the draft report.*** This should be an agency-wide plan that encompasses all aspects of customer service provided by the EEOC, including the customer service provided by the IIG. Once an agency-wide plan is developed, and includes goals and metrics for the IIG as the report recommends, the IIG can then work with OFP and OCHCO to ensure that those goals and metrics are included in, or updated, when reviewing IIG Performance Plans for IIG Contact Representatives, Management and the IIG’s SES Director. One observation that the IIG would add here is that the IIG’s customer service encompasses not only private sector customer service, but also federal sector customer service, as well as customer service to state and local government entities and individuals. As such, any revisions of goals and metrics in the IIG Performance Measures should take into consideration those additional customer service responsibilities.

### Recommendation #2

EEOC must manage customer expectations by making customer service standards available to the public.

***IIG Response to Recommendation #2. The IIG concurs that the EEOC must manage customer expectations by making customer service standards available to the public.*** As an observation, the IIG’s Interactive Voice Response (“IVR”), which is the recorded message customers hear when they call the IIG’s 1-800 number, also provides recorded information for those individuals who select the option to speak to an IIG Contact Representative. While customers who make that selection are waiting for a Contact Representative, they are provided with an approximate wait time which assists in managing expectations. Notably, the draft report is accurate in its assessment that the same expectation management is not currently available for emails coming in to the IIG. However, with the staffing that the IIG was able to complete in FY22, the IIG anticipates that it will be able to initiate a more formal rotation system for Contact Representatives to address emails. This increase in resources will assist the IIG in being able to provide accurate reply times for email inquiries, thus contributing to the IIG’s efforts to better manage customer expectations.

### Recommendation #3

The IIG must collect customer feedback and use the data to improve customer service efforts.

***IIG Response to Recommendation #3: The IIG concurs that the IIG must collect customer feedback and use the data to improve customer service efforts.*** As an observation, the IIG successfully launched its new Telephony Platform in June of FY22. One of the more significant post-launch activities that the IIG and its partners planned to implement is a real-time customer service survey for the IIG’s customers to complete after reaching out to the IIG. The IIG expects this real-time customer service survey to be a fully operational part of the IIG’s new Telephony system prior to the end of Calendar Year 2022.

### Recommendation #4

The IIG should explore and implement ways to reduce the call hold time and email response time for customers.

***IIG Response to Recommendation #4: The IIG concurs that the IIG should explore and implement ways to reduce the call hold time and email response time for customers.*** As an observation, the IIG’s new Telephony System is expected to assist in reducing call hold time as the enhancements to the system, including SMS text messaging, will enable callers to the IIG to obtain the information they seek without having to be put into the “queue” to speak to an IIG Contact Representative. The fewer callers that enter that queue to speak to an IIG Contact Representative, the lower the call hold time will be for those remaining callers that still do want, or need, to enter that queue. As another observation, the draft report notes that the IIG Contact Representatives’ Average Talk Time (“ATT”) is currently at an approximately ideal level. As such, any additional solution to reducing call hold time does not appear to lie with training for the current IIG Contact Representatives, but rather with recruiting, training and retaining additional Contact Representatives. Similarly, additional IIG Contact Representatives will assist the IIG with addressing its year-over-year dramatic increases in email volume by allowing the IIG to rotate a specific number of trained IIG Contact Representatives into an Email Response rotation for one to two weeks to properly and timely address the IIG emails.

### Recommendation #5

The IIG should design and implement a quality assurance program for customer emails.

***IIG Response to Recommendation #5: The IIG concurs that the IIG should design and implement a quality assurance program for customer emails.*** As an observation, this recommendation was one of the IIG’s goals during FY22 and that goal was met. Specifically, The IIG Quality Plan has been updated to include the new quality assurance measures for email processing. Notably, the IIG had to wait until after the new Telephony System was live (June 3, 2022) to implement changes to the IIG quality plan as the new technology includes the needed quality monitoring tools required to review and assess transactions. In addition to handling telephone calls from the public the IIG responds to email requests. Like those telephone transactions, customers who prefer to contact EEOC via email have the exact same questions and service requests. The IIG quality assurance (QA) process for handling email was modeled after the proven QA process for handling incoming calls (the draft report acknowledges the quality of

the QA process for incoming calls). The IIG first tailored the Call Monitoring Form and Scorecard to fit the email process. This required adjustments to the form content, quality attributes, and scoring weights. The IIG then developed and tested a prototype form and tweaked it during email calibration sessions to confirm the desired effect. The IIG collaborated with the Government Contact Center Council (G3C) to confirm this new process was in-line with industry standards and other government agencies.

Recommendation #6

OFP should assess the usefulness of generating 846 inquiries (i.e.; return on investment) and assess whether automatic close out in the system is more practical.

***IIG Response to Recommendation #6: The IIG concurs that OFP should assess the usefulness of generating 846 inquiries (i.e., return on investment) and assess whether automatic close out in the system is more practical.*** As an observation, OFP has been engaging in such an assessment throughout FY22 and into FY23. These assessments are ongoing and are being conducted in conjunction with EEOC Senior Leadership.

Recommendation #7

OFP should establish guidelines for generating 846 inquiries and other information sharing between the IIG and district offices.

**IIG Response to Recommendation #7: The IIG concurs that OFP should establish guidelines for generating 846 inquiries and other information sharing between the IIG and district offices.** The IIG's observation with respect to this Recommendation is the same as the observation stated with respect to Recommendation #6.