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DEPARTMENT OF STATE
ACTION MEMORANDUM

S/S

APR 18 1974

To: The Secretary

From: AA/AFR (AID) - Samuel C. Adams, Jr. *SCA*
CU (STATE) - Richard K. Fox, Jr. *RKF*
CA/FS/AF (STATE) - Howard T. Robinson *HR*
AA/TA (AID) - Theodore E. Brown, Jr. *T.E.B.*
IAA (USIA) - Horace G. Dawson *HGD*
EB/OA/AVP (STATE) - Jacques Cooke *JC*

Action Memorandums on Minority Employee Programs
in the Foreign Affairs Agencies

In January 1974, we met with you, as a group of officers representing the prevailing views of a majority of Black Foreign Service and domestic personnel in the three major Foreign Affairs Agencies. We articulated to you four basic problem areas:

- A. The need for an increased intake of minority Foreign Service officers at the middle and senior ranks and to improve the career opportunities for minorities in the Foreign Affairs Agencies.
- B. The need to upgrade the Equal Employment Opportunity Office in the Department of State to the level of Deputy Assistant Secretary for Equal Employment Opportunity.
- C. The need for an accelerated Upward Mobility Program for minorities in each of the Foreign Affairs agencies.
- D. The need for increased appointment of minority personnel to positions of Chief of Mission, AID Mission Director, and Country Public Affairs Officer, and that these appointments be widened to include all geographical areas.



You asked that we provide you with recommendations on each of the items mentioned above within a reasonable period of time following that meeting, and that we plan to meet with you again after a period of six months to assess progress made within that time with respect to the problem areas noted above.

The purpose of this memorandum is to transmit to you papers on each of the areas mentioned above except that of appointment of minorities to Ambassadorial posts, AID Mission Director and Country Public Affairs Officers. We have not provided a paper on this subject because you indicated that you would give personal attention to appointments of this nature. A brief summary of each paper follows:

A. Improving Career Opportunities for Minorities in the Foreign Service. This paper addresses the need for an expanded intake of minorities at the middle and senior levels of the Foreign Service, assignment policies for minorities, and promotion opportunities for minorities in the Foreign Service.

B. Upgrading the Office of Equal Employment Opportunity. In this paper we address the functions that should be a part of the office in its new and upgraded status. We also make recommendations about the professional caliber of personnel and the functional responsibilities that would be expected. The elevation of this office in status is particularly significant since such action would equate with action taken by other Federal Agencies to place the Equal Employment Opportunity function at the Deputy Assistant Secretary level or higher. USIA has recently elevated this function to equivalent Deputy Assistant Secretary status.

C. Upward Mobility in the Foreign Affairs Agencies. This paper addresses the need to pursue a vigorous program for identifying minorities in low level and dead-end jobs in all Foreign Affairs agencies, and developing opportunities for training, promotion, and assignment to meaningful jobs based on potential

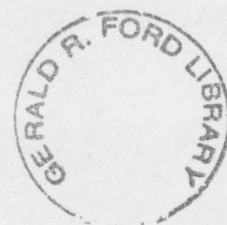


for growth and the ability to contribute to the basic objectives of the Department and other Foreign Affairs agencies.

With respect to personnel who have promise for appointment to positions as Chief of Mission, and for lateral entry into the Foreign Service, we are developing a list of personnel with resumes who possess talents that would qualify them for either appointment to positions as Chief of Mission, AID Mission Director, or as Country Public Affairs Officer, or for nomination as lateral entry candidates for the Foreign Service of the Department of State or USIA. We believe that in order for the programs included herein to be effective they should embrace all of the Foreign Affairs agencies. We see each agency as having the potential to complement each other in pursuit of improving the career opportunities of minorities in the Foreign Affairs agencies. Of particular importance is the possibility of using each of the sister agencies as a universe from which to draw candidates for lateral entry into the Foreign Service. For this reason we favor the concept of a Task Force, with members from each agency, to study ways of using the Foreign Affairs agencies as a whole to implement each of the recommendations. We see the Task Force as properly operating under the authority of the Secretary to make recommendations that would be applicable to each agency.

Our recommendations are as follows:

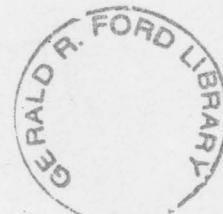
1. That you approve the paper on the proposal to upgrade the Office of Equal Employment Opportunity, and that its implementation proceed with a target date of not later than July 1, 1974.
2. That you approve the concepts expressed in the paper on Improving Career Opportunities for Minorities in the Foreign Service, including a Task Force to pull together an implementation schema which would include members from each of the Foreign Affairs agencies.
3. That you approve the paper on Upward Mobility in the Foreign Affairs agencies as a general concept



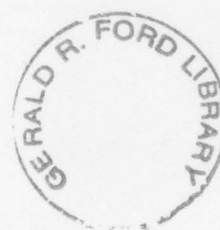
and desired goal, and that you approve the appointment of a Task Force, with members to be drawn from each of the Foreign Affairs agencies, to develop an Action Plan that would embrace each of the agencies.

Attachments:

- Tab A - Proposal Improving Career Opportunities for Minorities in the Foreign Service.
- Tab B - Proposal Upgrading the Office of Equal Employment Opportunity.
- Tab C - Proposal Upward Mobility in the Foreign Affairs Agencies.



TAB A



A PROPOSAL FOR IMPROVING CAREER OPPORTUNITIES
FOR MINORITIES IN THE FOREIGN SERVICE

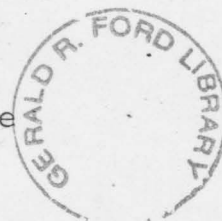
THE PROBLEM

A lack of intake of minority candidates into the Foreign Service at lower levels for a sufficiently long enough period of time to have assured adequate numbers of Foreign Service Officers at the mid-career and senior levels. It is the lack of sufficient minorities at the mid-career and senior levels which must be addressed if the Department expects to fulfill its equal opportunity responsibilities.

BACKGROUND AND DISCUSSION

In the recent past the Department of State has given sanction to a number of proposals aimed at increasing minority participation in the Foreign Service. There continues to be a dearth of minorities in the Foreign Service, as regular Foreign Service officers or Reserve Officers at any level, but particularly at the mid and senior levels. In late 1968, the Department authorized a mid-career program aimed at increasing minority participation at the mid-level. The target was to recruit qualified candidates at the FSR-3 through FSR-6 level with the intention that after a probationary and screening period they would be subjected to the oral examination process. If these candidates were found successful, they would enter the Foreign Service Officer Corps via lateral entry. The mid-career program was discontinued in 1970 because of OPRED, BALPA, employment freezes and funding problems. During the program's two-year life the EEO office reports that 11 minorities were hired under this program which included 10 Blacks and 1 Spanish-Surnamed. Two of the eleven have since left the Department. Seven of the eleven have become Foreign Service Officers through the lateral entry provisions of the Foreign Service Act of 1946 (1 FSO-2, 1 FSO-3, 2 FSO-5's, and 3 FSO-6's).

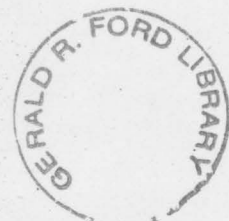
If the above statement of the problem is accepted that there is a large gap in the mid-level and a sizeable gap



at the senior level, then we can theoretically assume over a period of years that those few minority candidates at the junior and mid-levels will soon rise to fill the gaps that are apparent at both levels. This assumption presupposes however, that there is an adequate reserve of minority candidates at the junior and middle range. This is not the case at the mid-level.

In view of the shortage of minority candidates at the mid-level, the Department must initiate a program designed to take in qualified minorities from outside the Department of State who possess talents that could significantly enhance the image of the Department and who could make a definite contribution to the administration of our foreign policy.

The added intake program would mean the recruitment of candidates for the mid and senior levels who would be expected to lateral into the regular Foreign Service Officer Corps after serving an appropriate probationary period. After this probationary period, they would become regular FSO candidates. We envision that sources of recruitment of minority candidates for the added intake program would include minorities already serving in the Federal Government with domestic and foreign affairs agencies such as the Peace Corps, the Commerce Department, the Department of Labor, AID, and the Department of Health, Education and Welfare, and minority candidates from outside the Federal Government. Previous Mid-Career Minority Programs tend to show that the basic methodology and procedures were sound, even though very few minorities were brought into the regular Foreign Service Officer Corps through these programs. The basic guidelines for these programs, with an updated philosophy, as outlined above could help the Department to meet its equal opportunity responsibilities. The recommended recruitment procedures should be geared towards the recruitment of a number of candidates thought required for a particular year. At a minimum it would seem possible to recruit anywhere from 10 to 20 candidates per year utilizing the above recommended procedures.



The mechanics of the previous Mid-Career Program operated on a Rotating Recruitment Complement procedure that allowed the immediate appointment of a qualified candidate if no funded positions were available elsewhere within the Department to accommodate the appointment. This procedure allowed the Equal Employment Opportunity Office to use a holding action when qualified candidates were found in order that they not be lost. Such an arrangement should be initiated once more in an attempt to accelerate the intake of minorities at the mid and senior levels. While the EEO in an earlier paper has recommended that a complement of 5 positions would be sufficient, we recommend that it be increased to a minimum of 10 positions on an annual basis. In a separate paper on the reorganization and upgrading of the Office of Equal Employment Opportunity it has been recommended that the function for minority recruitment be left with that office, but on an expanded scope. The EEO would also be responsible for development intake sources, and for making recommendations to the Office of Personnel on sources of recruitment.

The EEO Office statistics indicate that the Foreign Service Reserve Junior Officer Program (FSR/JO) has served as an excellent method for increasing minority participation at the Junior Officer level. Since 1967, there have been 106 minority FSR/Junior Officers who have entered the Department. Of this number twenty have become regular Foreign Service Officers. Twelve additional FSR/JO's have been recommended for regular appointments through the lateral entry program and their appointments are currently being processed. One additional FSR/JO has passed the written and oral FSO examination and the appointment as a Foreign Service Officer is being processed. The majority of FSR/JO's have entered the FSO Corps at the Class 6 level. There have been no appointment above the Class 5 level. Twelve appointees (4 Blacks; 5 Spanish-Surnamed; and 3 Orientals) have left the Department within the last 6 years. Even with these gains minority officers still only constitute 3.77% (2.8% Black; 0.8% Spanish-Surnamed; and 0.5% Oriental) of the Foreign Service Officer Corps.



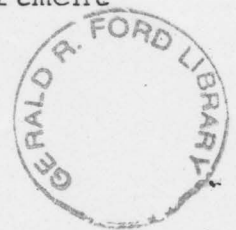
Out of the total of 127 minority Foreign Service Officers, only 15 are in classes 1-2 (10 Blacks, 4 Spanish-Surnamed, 1 Oriental); 18 are in Class 3 (7 Blacks, 6 Spanish-Surnamed, 5 Orientals). Almost one third (41) of the minority Foreign Service Officers are in Class 5 (27 Blacks, 10 Spanish-Surnamed, 4 Orientals). This program should be continued for the foreseeable future or until minority representation in the FSO Officer Corps in Grades 5-8 has reached a level of approximately 18%. Currently, there are no appreciable numbers of minority groups within the Department who have not already applied for lateral entry into the Foreign Service Officer Corps. Those minority Foreign Service Officers who were interested in lateral entry into the Foreign Service Officer Corps have already applied for entry under the aegis of the Management Reform Program. While there remains an insignificant number of FSR minorities in the Department at this time, it would appear that none of these persons are interested in lateral entry into the regular Foreign Service Officer Corps, except for FSR/JO's.

PROMOTIONAL OPPORTUNITIES AFTER APPOINTMENT

Minority candidates who are appointed to the regular Foreign Service Officer Corps through the lateral entry and other special programs are often faced with a problem of how long the candidate will be required to remain at the entering grade before being promoted consistent with good performance. Statistics demonstrate that lateral entrants from without the Department of State tend to spend a longer period of time in grade before receiving their first promotion after appointment as a regular Foreign Service Officer. This issue must be resolved if the Department expects to recruit highly qualified individuals for service as regular Foreign Service Officers.

ASSIGNMENTS

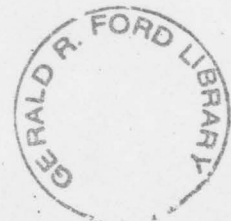
Priority consideration should be given to assigning more minority officers to high level jobs within the Department



and at posts abroad. It is particularly important that priority consideration be given to the assignment of minority members to positions at Office Director, Deputy Director, Division Chief, and Deputy Assistant Secretary levels, particularly in the areas of A and M/DG. Further, a mechanism should be initiated which will insure that minority candidates are actively sought each time a position vacancy occurs regardless of level or location.

SUMMARY AND RECOMMENDATIONS

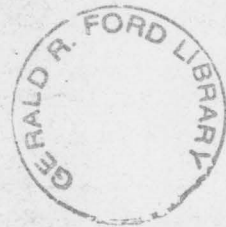
- 1) That the Department accelerate its intake of minority candidates from sources outside the Department at the mid and senior levels to insure increased minority career officer representation. This "added intake program" should consist of two elements: a) Minority candidates from the private sector (business, universities, civil organizations and foundations) who would be expected to qualify for lateral entry into the regular foreign service after a probationary period of from 3-5 years; b) Minority candidates already serving in the Federal Government who would lateral entry into the regular Foreign Service Officer Corps under Section 518 of the Foreign Service Act of 1946 as amended.
- 2) That the concept of a Rotating Recruitment Complement for minority candidates be maintained, but that the number of positions be increased to a minimum of 10 positions on an annual basis.
- 3) That the FSR/JO program be continued for the foreseeable future or until minority representation in the Foreign Service Officer Corps in grades 5-8 has reached a level of approximately 18% or a level of sufficiency which would insure a constant flow to the mid and senior levels.



4) That the Department make a concerted effort to insure that promotions for minority candidates who enter through special programs be based on his personal experiences prior to joining the Foreign Service as well as his performance while in the Foreign Service.

5) That priority consideration be given to the appointment of minority candidates to substantial assignments. Priority consideration should be given to the assignment of minority candidates at the Office Director, Deputy Office Director, and Deputy Assistant Secretary level throughout the Department.

6) That a mechanism be initiated which would have as its objective the mandatory automatic consideration of minority candidates for all position vacancies regardless of class level or location.



TAB B



A PROPOSAL FOR UPWARD MOBILITY FOR MINORITIES IN
THE FOREIGN AFFAIRS AGENCIES

INTRODUCTION

Movement of employees up the career ladder has been a traditional problem in all personnel systems. Lower-level employees, especially young employees, have often complained of the "mid-career" bulge. This situation of slow movement up the ladder or no movement up the ladder has had special ramifications for minority personnel. Minorities, because of their status in the society, have been discriminated against in terms of promotion and have advanced slowly, if at all, in the system.

In the foreign affairs agencies as in other government and private agencies the problem of upward mobility for minorities and women is still unresolved. It is being attacked by piecemeal approaches. Formal equal employment opportunity programs have been one attempt to direct attention to the variety of problems facing minorities and women, including upward mobility. In other instances special upward mobility programs have been launched, separate from EEO programs, as is the case with the Mustang program in the Department of State where it is directed by Personnel. What is now called for in the foreign affairs agencies is first a strong commitment to upward mobility and secondly a comprehensive plan for implementing the commitment.

The State of Upward Mobility Program in
the Foreign Affairs Agencies

Of the three major foreign affairs agencies, State, AID, and USIA, two have specific upward mobility programs -- State and AID. The most extensive programs are those of AID. They have approached upward mobility in three ways: education, on-the-job training, and a combination of the two.



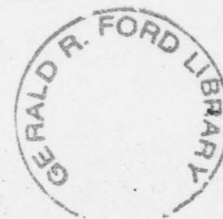
Agency for International Development

The first step was taken by AID in 1969 when there was a decision to make special use of the Federal After Hours Program (open to employees at all grade levels) to encourage lower graded employees to seek academic degrees as a means of improving their career opportunities. Selection panels ranked interested employees according to the supervisor's appraisal, the employee's work, and a personal interview. Twenty-five people were selected for the first class in 1969; twenty-five in the second class and twenty-six in the third class for a total of seventy-six candidates. They are enrolled in degree programs in one of five fields: psychology, political science, public administration, mathematics, and business administration. Each receives career counseling and after successfully completing the sophomore year is granted leave with pay to complete one full year on campus.

The second AID program is a three-year, on-the-job training program, called the Computers Specialists Program. The program seeks to match the desires of employees to switch from dead-end jobs with the Agency's need to fill shortages in special areas. Twenty employees at levels GS-5 through GS-7 have been accepted for training in third generation computers. Successful completion of each year of training leads to successive promotions.

"Project Up" is geared to employees of demonstrated potential who have been marking time in dead-end jobs at the GS-5 through GS-7 levels. Once identified they are retrained on the job to be program analysts, financial analysts, accounts technicians, voucher analysts, contract specialists, travel assistants, and managerial assistants. Upon completion of training, technical personnel are promoted to the GS-6 or GS-7 level and others are targeted for the GS-9 level.

Newest of the AID programs is Project Stride, a work-study, career development, intern program. It seeks to overcome what were felt to be shortcomings in earlier programs. While after-hours training is an obvious plus for those who go on to acquire degrees, it does not offer job placement at the end. On-the-job training guarantees a job at the



end of the training period, but such training often needs to be supplemented by the broader exposure gained through outside study. Project Stride provides on-the-job training, career counseling, and outside study leading to a bachelor's or master's degree. Employee time is equally divided between the job and study. There were two hundred applicants for the twenty-five places. So far, employee demand for the programs has far outdistanced supply. And the few programs available to AID employees involve only GS employees, leaving aside for the time being the needs of Foreign Service Personnel.

Department of State

The Department of State's commitment to upward mobility of lower grade employees consists of the Mustang program, an on-the-job training program for both Foreign Service and Civil Service Employees. It is open to Civil Service employees in grades GS-1 through GS-8 and Foreign Service Staff employees in Classes 10 through 6. Civil Service employees are selected on the basis of their performance files, a written essay, and an oral examination. There are approximately 10 such employees selected each year.

Foreign Service Employees. After completion of training and other instruction (at FSI, Civil Service Commission, other Federal agencies, or local institutions, and by special reports, seminars, and individual counseling) employees are appointed as Reserve Officers and have a chance for assignment as Foreign Affairs Specialists and Foreign Service Officers.

One disadvantage of the Civil Service Program is that no specific positions are identified in advance for the successful Mustang.

U. S. Information Agency

At the moment, USIA has no special upward mobility program for lower grade employees. We have learned that they presently are discussing plans for such a program.



SOME CONCLUSIONS

Where upward mobility programs exist they have met with overwhelming response from employees.

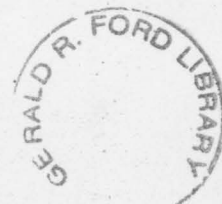
Since AID has met with success in the programs offered for Civil Service employees, the time is ripe for initiating similar programs for its Foreign Service personnel.

While making some headway through the Mustang program, the State Department should be seriously considering an expanded effort. Recent figures on the educational background of personnel reveal that more should be done in this area. One startling figure revealed that only 14 percent of the black employees hold college degrees. Greater use could be made of the after-hours study program in a manner similar to the AID program. Another option worth considering is getting better qualified minority personnel by permitting hire from among those passing the Federal Service Entrance Examination. The matter of retraining people in dead-end jobs should also be studied.

USIA should be urged to get moving on upward mobility programs for its employees.

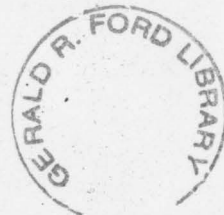
All foreign affairs agencies fall short in many of the areas outlined in the Civil Service document on upward mobility programs. Aside from the programs mentioned, little energy has been expended on creating career development plans for lower grade employees. No time has been devoted to conducting positive programs of occupational analysis, job re-design, and job restructuring to provide new opportunities for entry employment, advancement, and higher grade job ladders.

This is a serious matter which requires a great deal of forethought and planning. No one person should be asked to come up with all the answers for it requires the best thinking of many people. The Upward Mobility staff of the Office of Federal Equal Employment Opportunity is providing increased services to Federal agencies in developing and implementing upward mobility programs and their assistance should be sought in this instance.



RECOMMENDATIONS

1. That high priority be given to the development and expansion of upward mobility programs for lower grade Foreign Service and Civil Service personnel along the lines mentioned in the conclusions above.
2. That EEO offices in each agency assist the Offices of personnel in developing such programs.
3. That greater attention and resources be directed toward career counseling since counseling is crucial to career development of employees in the lower grades and to the success of upward mobility programs. One suggestion is that one person be assigned full-time to career counseling in the EEO office and two full-time employees be assigned the function in personnel.
4. That a Task Force be appointed from within the three Foreign Affairs Agencies to develop strategies and methodology applicable to the Foreign Affairs Community in the implementation of 1, 2 and 3 above.



TAB C

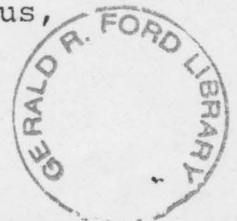


A PROPOSAL TO REORGANIZE AND UPGRADE THE OFFICE OF
EQUAL EMPLOYMENT OPPORTUNITY (M/EP) OF THE
DEPARTMENT OF STATE

Currently, the Office of Equal Employment Opportunity (M/EP) is functionally organized as a part of the Office of the Deputy Under Secretary for Management. While the Deputy Under Secretary of State for Management has been delegated the Equal Employment Opportunity Officer for the Department of State, the day to day administrative responsibilities are vested in the Director of the Office of Equal Employment Opportunity. This is a proposal to restructure the office and functions embracing the entire area of equal employment opportunities, civil rights, and counseling. The plan for restructuring and upgrading takes note of:

- a. The need to provide increased attention to equal employment opportunity in the Department at a high level.
- b. Recognition of the importance of the functions associated with equal employment opportunity, and civil rights.
- c. Providing the same status for this important function as is done in other agencies of the Federal Government. For example, USIA has recently accorded Assistant Director status to this function, a rank equivalent to Deputy Assistant Secretary.

PROPOSED TITLE OF THE NEW OFFICE: Deputy Assistant Secretary for Equal Employment Opportunity. It is proposed that this new Deputy Assistant Secretary for Equal Employment Opportunity operate functionally under the Deputy Under Secretary of State for Management who is currently responsible for the resource allocation of personnel and funds for the operational support of the Department of State. The functions of equal employment opportunity must be viewed as a part of the economic and judicious use of personnel in furtherance of our foreign policy objectives as well as a part of the overall administration of personnel and financial resources. Thus, the office is seen as appropriately functioning at this level.



PROPOSED ORGANIZATION OF THE OFFICE OF THE DEPUTY ASSISTANT SECRETARY FOR EQUAL EMPLOYMENT OPPORTUNITY. Proposed organization and functional responsibilities are set forth below.

a. The Immediate Office of the Deputy Assistant Secretary

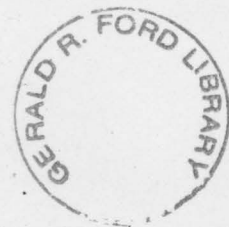
The Deputy Assistant Secretary is delegated full responsibility and authority for policy formulation and administration of all Equal Employment Opportunity activities, appeals, and decisions related thereto in the Department of State and for monitorship over, and participation in the selection process for ambassadorial and chief of mission appointments. All such functionally related responsibility is centered in this office. The Deputy Assistant Secretary reports to the Deputy Under Secretary for Management. The Deputy Assistant Secretary will be assisted by three principal deputies.

b. Program Planning. This is the functional area which would be responsible for:

(1) Development and follow-up of affirmative action plans and programs. This includes programs for minorities; the 16-point program coordination for the Spanish-Surnamed; the development of community relations programs in furtherance of the Equal Employment Opportunity and Civil Rights Program; and the development of a Public Relations Program.

(2) Coordination with appropriate elements within the Department, particularly the FSI and the Training Liaison Staff in PER to insure that training programs reflect the commitment of the Department to Equal Employment Opportunity.

(3) Development of Equal Employment Opportunity Regulations for the administration of the EEO program in the Department and abroad. Included also is the provision for reviewing Departmental regulations to insure that requirements of law regarding the Equal Employment Opportunity Program are included in all regulations dealing with Personnel Policy and Procedures. This responsibility includes the promulgation of procedures for the EEO Counseling Program and training for counselors in the Department and abroad; the planning and development of the Department-wide impetus for upward mobility programs for Civil Service personnel in the Department, and the Foreign Service.



c. Program Review and Evaluation. This functional area includes:

(1) Contract compliance and Title VI review activities.

(2) EEO investigative activities associated with the filing of complaints under the law with respect to race, color, sex, or national origin.

(3) The development and maintenance of minority statistics reflecting minority employment, promotions, assignments, and related trends in achieving Equal Employment Opportunity within the Department of State. It is expected that all reports reflecting the status of the Equal Employment Opportunity Program would be a part of this function.

(4) Providing liaison with M/DG/PER and monitorship review of minority appointments, worldwide assignments, promotions, and appointments.

(5) Providing liaison with PER in assuring substantive EEO input into the development of Performance Evaluation and Selection Board precepts.

(6) Providing for the assignment of EEO cases to an investigator to assure reasonably prompt resolution.

(7) Reviewing performance of Action Plans and insuring program requirements input.

d. Program Operations. This functional area covers operation of the following programs:

(1) The Foreign Service Reserve Officer/Junior Officer Program.

(2) The Mid-Career Lateral Entry Program

STAFFING: The Office of the Deputy Assistant Secretary for Equal Employment Opportunity should be staffed along the following suggested patterns:

Immediate Office:

1 Deputy Assistant Secretary



Program Planning:

2 positions at the 0-2/0-3 level would be required to carry out the four major functions. (The senior position will be considered as the Principal Deputy. It should be established as an RU/O position).

Program Review and Evaluation:

2 positions are required. One should be at the 0-3 level, while the second could be at 0-4/0-5 level. (One position should be established as an RU/O position).

Program Operations:

2 positions are required at the 0-4/0-5 level.

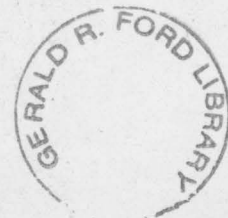
Secretarial Assistance:

1 Secretary/Administrative Assistant Position at the GS-09 level to serve as principal secretary to the Deputy Assistant Secretary.

2 Secretary/Stenographers at the grade level of GS-07 to provide the general secretarial services to the office.

The staffing of the office will be difficult in terms of attracting first rate Foreign Service Officers to serve in positions below that of Deputy Assistant Secretary. The record tends to show that officers who serve in positions not normally associated with the Foreign Service do not receive the same consideration for promotion and assignments as their colleagues. Therefore, the service in an office such as the EEO office should be viewed in terms of positive performance that would be sought by officers and that would be considered by promotion panels and assignment panels as constituting superior service. In order to insure this, the following should be considered:

- a. Including service in EEO activities within the precept formulation as a positive performance.



b. A statement of policy by the Secretary that serving in EEO activities will merit the same kind of consideration as serving as a Deputy Examiner for example.

