

the past few years in connection with the processing of our ever-increasing formal proceedings caseload (rates, finance, and operating rights). However, the substantial increase in our caseload without an equivalent increase in personnel was a primary consideration in consolidating all of our proceedings work in a single Office of Proceedings and the use of attorneys in all specialty areas. We feel this refinement of our proceedings work over the past few years has been a good move and will result in continued greater production of cases.

The creation of the Department of Transportation and transfer of ICC safety functions to that agency resulted in our organizing and structuring in one Bureau of Operations, the positions in connection with economic regulation of rail, motor, water, and freight forwarder activities. In general, we believe we give careful consideration to the need for work organizational changes. When changes are deemed desirable, we move expeditiously and structure the positions as appropriate.

6. LACK OF AN EFFECTIVE COMMUNICATION DEVICE TO HELP TRANSLATE WRITTEN PERSONNEL POLICIES INTO ACTUAL PROGRAMS IN OPERATION

The Chairman and Vice Chairman have acquainted themselves with and given support to the current concepts of the Commission's personnel management program, its policies, and procedures. They make their views known to all bureau and office officials as appropriate occasions arise. The Managing Director effectively presents and supports the personnel program with top management and has provided the necessary leadership to place personnel programs into actual programs in operation.

In a small agency such as the ICC, effective communication devices are easily developed for the mutual exchange of information and ideas between management and employees up, down, and across organizational lines in the formulation and change of practices or procedures which affect the individual employee or group work situations. Information about new or revised personnel policies, procedures, changes, and development is promptly disseminated to management officials and appropriate employee organizations before they are made effective in order to obtain comments and suggestions. Such participation serves to help translate written personnel management policies into actual programs in operation when the regulations are promulgated.

The Vice Chairman meets each month with the Managing Director and the regulatory bureau heads to discuss problems and to give emphasis and support to ongoing programs. At these meetings, the Managing Director discusses new personnel management policies and reemphasizes those programs which have become lax. New or revised personnel management programs are discussed at the lowest levels through bureau and office supervisory conference devices in such a manner appropriate to reach the maximum number of employees.

Top management officials maintain an "open door" policy and employees are encouraged to use various channels of communication to discuss personnel policies and any problems they may have, including consultation with appropriate union representatives and members of the Personnel Office.

7. NO SYSTEMATIC APPROACH OF EVALUATING AND REPORTING ON PERSONNEL MANAGEMENT OPERATIONS

This Commission has a system, conducted by the Director of Personnel, of reviewing personnel operations and practices, evaluating their effectiveness, identifying problem areas, and implementing corrective action. This is done on a regular basis by onsite review and discussion with operating officials both in the field and in the headquarters. This system has resulted in greater awareness by supervisors of personnel management programs, techniques, problems, and approaches for solutions and improvement. Status reports and recommendations are made to the Managing Director.

In addition, we have monthly reports from regional managers and bureau and office heads which include personnel management problems. We have an action plan for equal employment opportunity which requires periodic reports from bureau and office heads on efforts taken to assure equal employment opportunity regardless of race, religion, color, sex, national origin, martial status, politics, physical handicap, and age.