

primary sources of labor: (1) academia and (2) industry. We concentrate on those schools which offer such courses as will best qualify its students for transportation careers. We draw upon the assistance and advice of the teaching staff, and we actively recruit on-campus. Our field staff members assist our recruiting at schools, as well as in private industry.

We also recruit by advertising in selected professional and trade journals. Finally, we continuously strive throughout the year to establish satisfactory relationships with a number of high schools nationwide in order to secure the higher quality graduates for clerical positions. In short, we aggressively compete for talent.

66. Does your agency emphasize promotion of employees on the basis of merit?

The Commission has expressed clear policy to promote on merit and has adopted plans and procedures which implement that policy without regard to race, religion, color, sex, national origin, marital status, politics, physical handicap, and age. We have individual promotion plans covering every identifiable position category in the competitive service. We are convinced that our merit promotion program operates on merit and without bias, etc. This is confirmed somewhat by the absence of employee appeals.

67. How does your agency consider employee complaints, grievances, and appeals?

Our grievance procedure was carefully structured in consultation with the Civil Service Commission and it is in accord with the latter's approved procedures. Our procedure provides for three levels at which employee complaints are processed. We strive to resolve as many complaints as possible at level I, where face-to-face discussion between the employee and his various supervisors is encouraged.

Level II constitutes the formal, structured process where the grievance is referred to the Personnel Director for decision. It is at this level that the employee has a right to a hearing conducted by a trained impartial hearing officer. At levels I and II, the employee has a right to a representative of his own choice to assist him in processing his complaint.

Level III is a review by the Managing Director of the record made at levels I and II. The decision at this level is the final decision. This procedure is in accordance with the Civil Service Commission's instructions and it does not apply to those matters appealable to the Civil Service Commission; i.e., adverse actions, performance ratings, reduction in force, violations of merit promotion plans, discrimination complaints, and position classification.

Those matters not subject to the grievance procedure outlined above are handled under the Commission's appeal system, which provides for the employee (1) the right to reconsideration, with an impartial hearing, of any proposed adverse action (separation, suspension, change to lower grade, etc.); (2) the right to appeal the decision on reconsideration to higher authority (the Managing Director); (3) the right to a representative of his choice; and (4) the right to appeal to the Civil Service Commission.

68. Is personnel management considered to be an integral part of the mission of your agency?

Yes; personnel management is considered an integral part of overall management in accomplishing the Commission's mission. It is our philosophy that our human resources are our most valuable asset and that our manpower requirements are considered inseparable from the major objectives of the Commission. Recruiting, training and developing, and maintaining an efficient productive work force are the responsibility of each manager.

69. How does your agency treat equal employment opportunity and employment of the handicapped?

Equal employment opportunity is very important to us. It is inherent in our concept of "merit principles" and we have given considerable attention to this matter. The Civil Service Commission has approved our "action plan" for equal employment opportunity. The plan is all inclusive and is thoroughly understood and participated in at all levels of the Commission.

H. GAO Audit Reports

70. Has the General Accounting Office issued any audit reports on the overall operations of your agency; that is, reports not directed at a functional program of the agency, but rather at the management and administration of the agency?

The last reports of this nature that we are aware of were in 1962. One was entitled "Review of Selected Activities, Interstate Commerce Commission" and