

U.S. DEPARTMENT OF LABOR

OFFICE OF THE ASSISTANT SECRETARY

WASHINGTON, D.C. 20210

OFCC-015



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AUG 24 1971

MEMORANDUM FOR ASSISTANT SECRETARY FLETCHER

The PBRC Working Group has reviewed your issue paper on OFCC. Although a series of recommendations appeared in the paper they were not accompanied by the analysis which must have been done to generate the recommendations. As a result, the Working Group is in no position to evaluate them. We would appreciate your providing us with the following additional information to permit an adequate evaluation to be made:

1. The rationale behind the number of positions and the cost of the proposed expanded field staff. Information should be supplied on such questions as how the field staff would fit into the reorganized ESA and its regional structure.
2. The rationale behind the recommendation to follow the precedent of Order Number 4 by amending the rules and regulations for the construction industry. This issue is significant enough to warrant an extensive analysis that would start from a sophisticated assessment of present efforts in the construction industry. It would include a much more complete analysis than the issue paper makes of why increased effort to develop hometown plans in the remaining target cities would lead to poor results. The paper should include a detailed discussion of the reasons why the precedent of Order Number 4 should be followed and the precise ways such an order would be applied to the construction industry. The practicality of setting individual county standards (including--as the issue paper suggests--goals for every county in the country) should be seriously considered.

3. The strategy underlying the program for utilization of women and the proposed program combating religious and national origin discrimination.

The present paper provides insufficient information on the principles established in the guidelines on sex discrimination and those that would be established by the religious affiliation guidelines. Material should be developed analyzing those principles and discussing in some detail the strategy OFCC intends to use in enforcing the guidelines. Particular consideration should be given to any strain on OFCC's national and field resources that might result from expanded efforts in these areas.

The final recommendation of the issue paper, biennial collection by BLS of data to guide contractors in developing affirmative action plans, also needs further analysis. I have asked Saul Hoch to have the Office of Research, ASPER, initiate and coordinate a joint ASPER, OFCC, BLS, and CICBC exploration of the feasibility and cost of such a program.



Laurence H. Silberman
Under Secretary of Labor