EMPLOYMENT

IN THE

OKLAHOMA DEPARTMENT OF EDUCATION

A REPORT BY THE OKLAHOMA ADVISORY COMMITTEE TO THE U.S. COMMISSION ON CIVIL RIGHTS

JUNE, 1982

THE UNITED STATES COMMISSION ON CIVIL RIGHTS

The United States Commission on Civil Rights, created by the Civil Rights Act of 1957, is an independent, bipartisan agency of the executive branch of the Federal Government. By the terms of the act, as amended, the Commission is charged with the following duties pertaining to discrimination or denials of the equal protection of the laws based on race, color, religion, sex, age, handicap, or national origin, or in the administration of justice: investigation of individual discriminatory denials of the right to vote; study of legal developments with respect to discrimination or denials of the equal protection of the law; appraisal of the laws and policies of the United States with respect to discrimination or denials of equal protection of the law; maintenance of a national clearinghouse for information respecting discrimination or denials of equal protection of the law; and investigation of patterns or practices of fraud or discrimination in the conduct of Federal elections. The Commission is also required to submit reports to the President and the Congress at such times as the Commission, the Congress, or the President shall deem desirable.

THE STATE ADVISORY COMMITTEES

An Advisory Committee to the United States Commission on Civil Rights has been established in each of the 50 States and the District of Columbia pursuant to section 105(c) of the Civil Rights Act of 1957 as amended. The Advisory Committees are made up of responsible persons who serve without compensation. Their functions under their mandate from the Commission are to: advise the Commission of all relevant information concerning their respective States on matters within the jurisdiction of the Commission; advise the Commission on matters of mutual concern in the preparation of reports of the Commission to the President and the Congress; receive reports, suggestions, and recommendations from individuals, public and private organizations, and public officials upon matters pertinent to inquiries conducted by the State Advisory Committee; initiate and forward advice and recommendations to the Commission upon matters in which the Commission shall request the assistance of the State Advisory Committee; and attend, as observers, any open hearing or conference which the Commission may hold within the State.

EMPLOYMENT IN THE OKLAHOMA DEPARTMENT OF EDUCATION

ATTRIBUTION:

The findings and recommendations contained in this report are those of the Oklahoma Advisory Committee to the United States Commission on Civil Rights and, as such, are not attributable to the Commission. This report has been prepared by the State Advisory Committee for submission to the Commission, and will be considered by the Commission in formulating its recommendations to the President and the Congress.

RIGHT OF RESPONSE:

Prior to the publication of a report, the State Advisory Committee affords to all individuals or organizations that may be defamed, degraded, or incriminated by any material contained in the report an opportunity to respond in writing to such material. All responses have been incorporated, appended, or otherwise reflected in the publication.

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Oklahoma Advisory Committee to the U.S. Commission on Civil Rights June 1982

MEMBERS OF THE COMMISSION Clarence M. Pendleton, Chairman Mary Louise Smith, Vice Chairman Mary F. Berry Blandina Cardenas Ramirez Jill Ruckelshaus Murray Saltzman

John Hope III, Acting Staff Director

Dear Commissioners:

The Oklahoma Advisory Committee submits the attached report on employment patterns in the State Department of Education from 1977 through 1980 by race, ethnicity, gender and job category. This report is planned for release at the conclusion of a consultation on Block Grants in Oklahoma in June, 1982.

The purpose of this study was to present an assessment of the composition of the agency's work force over the study period. This information will be used by the Committee as a base for future follow-up activity in the area of affirmative action and for working with State officials in strengthening the State's role in ensuring the enforcement of equal protection of the laws in the implementation of block grant programs in Oklahoma.

This report summarizes the employment patterns from **1977** through 1980. The purpose of the report is to direct State attention **to** its own actions and responsibilities and to influence, positively, its commitment to ensuring equal protection for all citizens, regardless of race, color, national origin, sex, age, or handicap.

The recommendations that are made are directed to the Governor, State legislators and other State officials.

It is our hope that the Commission will support our recommendations and use its influence to ensure maintenance of protection of civil rights laws through the block grants.

Respectfully,

EARL D. MITCHELL, Chairman

Membership

Oklahoma Advisory Committee

to the

United States Commission on Civil Rights

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Introduction

Today, education is perhaps the most important function of state and local governments. Compulsory school attendance laws and the great expenditures for education both demonstrate our recognition of the importance of education to our democratic society. It is required in the performance of our most basic public responsibilities, even service in the armed forces. It is the very foundation of good citizenship. Today it is a principal instrument in awakening the child to cultural values, in preparing him for later professional training, and for helping him to adjust normally to his environment. In these days, it is doubtful that any child may reasonably be expected to succeed in life if he is denied the opportunity of an education. Such an opportunity, where the state has undertaken to provide it, is a right which must be made available to all on equal terms.¹

In 1969, the United States Commission on Civil Rights found that the level of schooling one attains determines, to a large extent, the amount of money the individual will earn throughout his or her lifetime as well as the general economic well-being of the individual.²

In the State of Oklahoma, the responsibility of supervising all phases of public instruction in the classroom rests with a seven-member board of education, including the State superintendent of schools.³ The superintendent of schools for the State is elected by the people of Oklahoma for a term of four years.⁴ The six members of the State school board are each appointed by the governor for a six-year term.⁵ The Oklahoma Board of Education has among its duties and powers, the formulation and adoption of curriculum and instructional materials and full and exclusive authority pertaining to matters of qualification standards and certification standards of instructional, supervisory, and administrative positions and services within the system.⁶ The Oklahoma Board of Education does not, however, employ personnel in the local school districts.

The State school superintendent also serves as president of the State Board of Education and maintains an office in Oklahoma City.⁷ This individual is empowered to keep pertinent books and records, for the purpose of continuity, to be made available to his or her successor.⁸ The State superintendent is required to advise superintendents at the county, district, and area levels about questions relating to powers, duties, and functions of school district officials, upon request.⁹

Recently, the Reagan administration announced the consolidation of several categorical funding programs into a few block grants to be made available to each of the States.¹⁰ This means that, in all likelihood, the Oklahoma Department of Education will be responsible for implementing the Block Grant funds to be received by the State of Oklahoma.¹¹ Given the tremendous power and discretion which the agency already holds in influencing public policy and attitudes, the impact of this action is likely to hold special importance to the minorities residing in the state. The impact of such decision-making potentially has intense and enduring effects upon all affected groups. In addition, the nature and level of importance given to educational matters have long term consequences, not only to minorities but to the general population.

With these considerations in mind, the Oklahoma Advisory Committee to the United States Commission on Civil Rights has undertaken a study of the involvement of minorities and women in the educational policy-making and decision-making, its interpretation and implementation at the state level.

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Given no biases in the educational and employment opportunities for any group, one would expect to find proportionate representation from each racial/ethnic group among the work forces of the various State agencies. One also would expect to find the proportionate representation of the different groups within the various job categories and salary levels of these agencies and in the work force of the local schools. The following report compares the work force data from the Oklahoma Department of Education with the demographic statistics for the State.

General Population and School Statistics

As of the 1980 Census count, Oklahoma has a total population of 3,025,266 persons. Of these, 204,658 (or 6.8%) are black; 169,464 (or 5.6%) are American Indian; 54,413 (or 1.9%) are Hispanic, 53,413 (or 1.8%) represent other minority groups.¹² Whites make up approximately 84% of the population (2,540,370).

There are 457 independent school districts and 163 dependent school districts (i.e., those not having the full twelve grades) in Oklahoma.¹³ During the 1978-79 school year, the public school population totaled 620,176, a decline of 6,352 or 1% from the previous year.¹⁴ By 1980-81, the public school population in Oklahoma had declined to 586,893.¹⁵ The makeup of the 1980-81 school population is provided in Tables 1 and 2. Whites comprised approximately 78% of the school population. American Indians made up about 11%. Blacks made up 9%. Hispanics made up about 2% and Asian Americans comprised about 1% of the public school population in Oklahoma.¹⁶

Racial/Ethnic Characteristics Of Public School Students in Oklahoma 1980-1981

		Schoo	1 Population		
Total	Whites	Blacks	American Indians	Hispanics	Asian Americans
586,893	455,919	52,513	63,664	10,056	4,741 '
	(77.6%)	(9.0%)	(10.8%)	(1.7%)	(0.8%)
			Males	·	
303,751	236,218	26,959	32,890	5,220	2,464
(51.7%)	(40.2%)	(4.6%)	(5.6%)	(0.9%)	(0.4%)
			Females		·
283.142	219,701	25,554	30,774	4,836	2,277
(48.2%)	(37.4%)	(4.4%)	(5.2%)	(0.8%)	(0.4%)

Source: Pat Crist, Oklahoma Department of Education, Data Center Section, February 16, 1982

Among the classroom teachers, 17 there was an overwhelming predominance of Whites (93%). Minorities made up only 7% of all the classroom teachers in the state. 18 Table 2 provides the breakdown of the composition of classroom teachers in the state.

Distribution of Oklahoma Classroom Teachers By School Level 1980-1981

	Total	Whites	Blacks	American Indians	Hispanics	Asian Americans
Kindergarten	896 (100%)	837 (93.4%)	33 (3.7%)	23 (2.6%)	2 (0.2%)	1 (0.1%)
Elementary		12,512 (92.2%)			30 (0.2%)	15 (0.1%)
Middle School	1,981 (100%)	1,781 (89.9%)			9 (0.4%)	3 (0.2%)
Junior High	3,406 (100%)	3,164 (92.9%)		81 (2.4%)	13 (0.4%)	3 (0.1%)
Senior High	7,792 (100%)	7,283 (93.5%)			19 (0.2%)	4 (0.1%)
TOTAL	27,643 (100%)		1,424 (5.2%)	543 (2.0%)	73 (0.3%)	26 (0.1%)

Source: Pat Crist, Oklahoma Department of Education, Data Center Section. February 16, 1982.

Distribution of Full-time Employees In the Oklahoma Department of Education by Job Category 1977

Job Category	Total	White	Black	Hispanic	Asian Amer.	Amer. Indian	Male	Female.
Officials Adminis- trators	/ 40	38	0	0	0	2	37	3
Profes- sionals	134	118	2	1	1	12	84	50
Techni- cians	13	11	1	0	0	1	9	4
Para- profes- sionals	24	22	1	1	0	0	3	21
Office Clericals	86	84	2	0	0	0	2	84
TOTAL	297	273	6	2	. 1	15	135	162
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Source: State of Oklahoma, Department of Education. Employment Data as of January 31, 1977 (Feb. 15, 1977).

Distribution of Full-time Employees In the Oklahoma Department of Education by Job Category 1977

Job Category	Total	White	Black	Hispanic	Asian Amer.	Amer. Indian	Male	Female
Officials Adminis- trators	/ 100%	95%	0%	0%	0%	5%	92.5%	7 . 5%
Profes- sionals	100%	88%	1.5%	0.7%	0.7%	9.0%	62.7%	37.3%
Techni- cians	100%	84.6%	7.7%	0%	0%	7.7%	69.2%	30.8%
Para- profes- sionals	100%	91.7%	4.2%	4.2%	0%	0%	12.5%	87.5%
Office Clericals	: 100%	97.7%	2.3%	0%	0%	0%	2.3%	97.7%
TOTAL	100%	91.9%	2.0%	0.7%	0.3%	5.1%	45.5%	54.5%

Source: State of Oklahoma, Department of Education. Employment Data as of January 31, 1977 (Feb. 15, 1977).

Distribution of Full-time Employees In the Oklahoma Department of Education by Job Category 1979

Job Category	Total	White	Black	Hispanic	Asian Amer.	Amer. Indian	Male	Female.
Officials Adminis- trators	/ 42	39	1	0	0	2	37	5
Profes- sionals	183	161	6	1	0	15	93	90
Techni- cians	30	27	2	0	0	1	6	24
Para- profes- sionals	33	33	0	0	0	0	1	32
Office Clericals	84	78	4	0	1	1	2	82
TOTAL	372	338	13	1	1	19	139	233

Source: Oklahoma State Department of Education. State and Local Government Information (EEO-4) 1979.

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Distribution of Full-time Employees In the Oklahoma Department of Education by Job Category 1979

Job Category	Total	White	Black	Hispanic	Asian Amer.	Amer. Indian	Male	Female
Officials Adminis- trators	/ 100%	92.8%	2.4%	0%	0%	4.8%	88.1%	11.9%
Profes- sionals	100%	88.0%	3.3%	0.5%	0%	8.2%	50.8%	49.2%
Techni- cians	100%	90.0%	6.6%	0%	0%	3.3%	20.0%	80.0%
Para- profes- sionals	100%	100%	0%	0%	0%	0%	3.0%	97.0%
Office- Clericals	100%	92.9%	4.8%	0%	1.2%	1.2%	2.4%	97.6%
TOTAL	100%	90.8%	3.5%	0.3%	0.3%	5.2%	37.4%	62.6%

Source: Oklahoma State Department of Education. State and Local Government Information (EEO-4) 1977.

Distribution of Full-time Employees In the Oklahoma Department of Education by Job Category 1980

Job Category	Total	White	Black	Hispanic	Asian Amer.	Amer. Indian	Male	Female
Officials, Adminis- trators	7 50	48	1	0	0	1	42	8
Profes- sionals	203	183	6	1	0	13	90	113
Techni- cians	30	27	2	0	0	1	7	23
Para- profes- sionals	32	32	0	0	0	0	1	31
Office Clericals	93	87	4	0	0	2	2	91 ्
TOTAL	408	3 7 7	13	1	0	17	142	266

Source: Oklahoma State Department of Education. State and Local Government Information (EEO-4) 1980.

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Distribution of Full-time Employees In the Oklahoma Department of Education by Job Category 1980

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Total	White	Black	Hispanic	Asian Amer.	Amer. Indian	Male	Female
/ 100%	96%	2%	0%	0%	2%	84%	16%
100%	90.1%	3.0%	0.5%	0%	6.4%	44.3%	55.7%
100%	90.0%	6.7%	0%	0%	3.3%	23.3%	76.7%
100%	100%	0%	0%	0%	0%	3.1%	96.9%
100%	93.5%	4.3%	- 0%	0%	2.2%	2.2%	97.8%
100%	92.4%	3.2%	0.2%	0%	4.2%	34.8%	65.2%
	/ 100% 100% 100%	<pre>/ 100% 96% 100% 90.1% 100% 90.0% 100% 100% 100% 93.5%</pre>	/ 100% 96% 2% 100% 90.1% 3.0% 100% 90.0% 6.7% 100% 100% 0% 100% 93.5% 4.3%	/ 100% 96% 2% 0% 100% 90.1% 3.0% 0.5% 100% 90.0% 6.7% 0% 100% 100% 0% 0% 100% 93.5% 4.3% 0%	Total White Black Hispanic Amer. / 100% 96% 2% 0% 0% 100% 90.1% 3.0% 0.5% 0% 100% 90.0% 6.7% 0% 0% 100% 100% 0% 0% 0% 100% 93.5% 4.3% 0% 0%	Total White Black Hispanic Amer. Indian / 100% 96% 2% 0% 0% 2% 100% 96% 2% 0% 0% 2% 100% 90.1% 3.0% 0.5% 0% 6.4% 100% 90.0% 6.7% 0% 0% 3.3% 100% 100% 0% 0% 0% 0% 0% 100% 93.5% 4.3% 0% 0% 2.2%	Total White Black Hispanic Amer. Indian Male / 100% 96% 2% 0% 0% 2% 84% 100% 96% 2% 0% 0% 6.4% 44.3% 100% 90.1% 3.0% 0.5% 0% 6.4% 44.3% 100% 90.0% 6.7% 0% 0% 3.3% 23.3% 100% 100% 0% 0% 0% 3.1% 100% 93.5% 4.3% 0% 0% 2.2% 2.2%

Source: Oklahoma State Department of Education. State and Local Government Information (EEO-4) 1980.

Total Agency Work Force

In 1977, there were 297 persons employed by the Oklahoma Department of Education. Approximately 92% (a total of 273) were white; only 24 (or 8%) of these persons were minorities. More than half of the agency's work force was comprised of women (54.5%). Blacks made up only 2% of the agency work force; American Indians made up approximately 5%, and the combination of Hispanics and Asian Americans totaled slightly more than 1%.

By 1979, the agency work force had increased to 372 persons, a 25% increase. Of the total employees, whites comprised 94.6%. Blacks made up a total of 3.5%. American Indians made up 5.2%. Hispanics and other minority groups together totaled less than 1%.

As late as 1980, the agency's work force increased from the 1979 total of 372 to 408 (a 7.6% increase over the previous year). Whites made up 92.4% of the 1980 work force of the Oklahoma Department of Education. Blacks comprised 3.2% of the agency's work force. American Indians made up 4.2%. Hispanics and other minorities made up less than 1%.

Representation by Job Category

Officials/Administrators:

In 1977, whites made up 95% of the officials/administrators in the Oklahoma Department of Education. American Indians comprised the other 5%. THERE WERE NO BLACKS, HISPANICS, OR OTHER MINORITIES IN THIS JOB CATEGORY FOR THE AGENCY. In 1979, whites made up 93% or 39 of the 42 officials and administrators of the department. There was one black who comprised 2.4%. American Indians made up the remaining two or 4.8%. Still no Hispanics or other minority groups were found. As late as 1980, the proportion of

whites in the agency's officials/administrators category had increased to 96% or 48 of 50. The number of blacks in this category remained at one or 2% of the category. The number of American Indians dropped to one or 2% of the category. There were still no Hispanics nor were there other minority groups found in this category.

There were only five women, or 11.9%, among the 42 employees in this category in 1979. In 1980, eight of the 50 officials/administrators were females, representing 16% of the category.

Professionals

In the category of professional workers, whites comprised 88% of the total in 1977. Blacks comprised only 1.5%, American Indians made up 9%, and Hispanics and Asian Americans, together, totaled 1.4% of the total category. In 1979, the percentage of whites in the category remained unchanged (88%). The percentage of blacks increased to 3.3%. Representation by American Indians in the category fell to 8.2%, and Hispanics made up less than 1%. No other minority groups were found in the category for 1979. By 1980, the percentage of whites in the professional category increased to 90.1%. Representation by blacks in the category fell slightly to 3.0%. The percentage of Hispanics was less than 1%. American Indians, however, dropped from 8.2% to 2.5% in their representation in the professional job category for 1980.

Technicians

In 1977, there were only 13 persons employed by the agency as technicians. Of those, 11 (or 84%) were white. There was one black (7.7%) and one American Indian (7.7%) found in this category. Four of the employees (30.8%) in this category were females. By 1979, there were a total of 30 persons employed in this category. Of these, 27 were white (90%), only two (or 7%) were black, and only one (3%) was an American

Indian. The number of women in the category, however, increased to 24 (or 80%), of whom, 23 were white. In 1980, there were 30 persons employed in this category. There were still only three minorities found in the category. There was one additional white male (5) and one less white female (22) employed in the category. There were no Hispanics found in this category for either year of the study.

Para-professionals

In 1977, there were 24 persons employed by the agency in paraprofessional positions. Of the total, 22 were white, one was black and one was Hispanic. In 1979, the number of para-professionals employed by the agency increased to 33. NONE OF THESE EMPLOYEES WERE MINORITIES. Only one was male. In 1980, there were 32 para-professionals employed by the department. NONE OF THESE EMPLOYEES WERE MINORITIES.

Office-Clerical

In the category of office-clerical worker, there were a total of 86 persons employed by the agency in 1977. Of these 84 (or 98%) were white, only two were black. No other minorities were found in this category. There were 84 female employees in the category. By 1979, there were still only 84 employees in the category, however, there were four blacks, one American Indian, and one Asian American employed in the category. In 1980, there were 93 employees in the category. Of these, 87 were white (93.5%), four were black (4.3%), and two were American Indians (2.2%).

Other Categories

There were no other job categories represented by employees of this agency for either of the study years.

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Affirmative Action Plan

On September 14, 1979, Governor George Nigh of Oklahoma issued Executive Order 79-14 (See Appendix A). This order required that all agencies of the State, employing 15 or more persons, develop an affirmative action plan. The plans were to cover all elements of personnel administration and management and contain well defined measureable goals and timetables with fixed responsibility for their accomplishment. Agencies were to submit their written plan to the State Affirmative Action Officer by July, 1980. All of the plans that were submitted were reviewed by an Affirmative Action Committee which was composed of the Affirmative Action Officer of each of the lead agencies and the State Affirmative Action Officer.

On July 23, 1980, a letter was sent to the Oklahoma Department of Education, acknowledging receipt of the plan but indicating that the plan did not meet the guidelines developed by the State.

As of January 21, 1981, the plan still had not been received by the State Affirmative Action Officer. However, in December, 1981 a plan was submitted. The plan was approved by the Oklahoma State Personnel Board and currently is in effect.

FINDINGS

- 1. The characteristics of the work force within the Oklahoma Department of Education do not match the characteristics of the State population nor the population of the public school population. There are great disparities between the proportion of whites employed by the agency and the proportion of minorities, as individual groups and collectively.
- 2. There has been little or no change in the agency's work force characteristics over the past five years.
- 3. The characteristics of the work force are even more disparate at the local school levels.

RECOMMENDATIONS

- Given the likelihood that the State Department of Education will be the agency responsible for administering the State's block grant funds, the Oklahoma Advisory Committee recommends that a consultation be held with the Governor, members of the State Board of Education, the State Superintendent of Education, and State legislators to discuss:
 - a) The agency's Affirmative Action Plan to reduce the disparities between groups at all levels.
 - b) To discuss the agency's responsibility for ensuring that the civil rights of all groups are protected and the means for certifying that such assurances have been or are being met.

2. That an ongoing monitoring effort be made of changes in the demographic statistics of the State, changes in the work force characteristics at both the State and local levels, and changes in the public school population be monitored by the State Human Rights Commission, with an annual report to the governor.

FOOTNOTES

1 •	Brown V. Board of Education 347 U.S.483, 493 (1954)
2.	U.S. Commission on Civil Rights, Social Indicators of Equality for Minorities and Women, 1978, pp. 5-27.
3.	Oklahoma Constitution, Act XIII, § 5 (West 1952).
4.	Oklahoma Constitution, Act VI, § 4 (West 1981).
5.	Oklahoma Stat. Ann. tit. 70 § 3-101 (West 1972).
6.	Oklahoma Stat. Ann. tit. 70 § 3-104 (8) and (9) (West Supp. 1981- 1982).
7.	Oklahoma Stat. Ann. tit. 70 § 3-101 and § 3-106 (West Supp. 1981- 1982).
8.	Oklahoma Stat. Ann. tit. 70 § 3-106 (West Supp. 1981-1982).
9.	Oklahoma Stat. Ann. tit. 70 § 3-107 (West 1972).
10.	Omnibus Budget Reconciliation Act of 1981, Pub. L. No. 97-35 (August 13, 1981).
11.	Ibid.
12.	U.S., Dept. of Commerce, Bureau of the Census. <u>1980 Census of</u> <u>Population and Housing</u> . Advance Reports (Oklahoma). <u>PHC 80-V-38</u> . Table 1.
13.	Oklahoma Election Board, Directory of Oklahoma 1981. p. 412.
14.	Ibid.
15.	Derived from data from Oklahoma Dept. of Education, Data Center Section (See pp. 4-5).
16.	Ibid.
17.	Ibid.
18.	Ibid.

State Department of Education LESLIE FISHER, Superintendent Oklahoma City, Oklahoma 73105

May 3, 1982

Mr. John F. Dulles, II U.S. Commission on Civil Rights Heritage Plaza 418 South Main San Antonio, Texas

Dear Mr. Dulles:

This is in response to your letter of April 23 regarding the report being prepared for the U.S. Commission on Civil Rights.

The summary is correct except for page 10 where the correct figures have been written in. A copy of our report from which the original figures were taken is enclosed. Also enclosed is the approved Oklahoma State Department of Education Affirmative Action Plan.

Sincerely,

L∉slie Fisher State Superintendent

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Enclosures



OKLAHOMA STATE PERSONNEL BOARD



JIM THORPE MEMORIAL OFFICE BUILDING • 2101 N. LINCOLN BLVD. • STATE CAPITOL COMPLEX OKLA. CITY, OKLA. 73105 • (405) 521-2177

> James C. Thomas Administrator

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December 28, 1981

Ms. Violet G. Keef Director of Personnel Services DEPARTMENT OF EDUCATION Room 228, Oliver Hodge Building Oklahoma City, Oklahoma 73105

Dear Ms. Keef:

The State Personnel Board EEO/AA Division has received your agency's Affirmative Action Plan. Our review indicates that you have adequately covered all areas required.

The Superintendent's excellent policy statement should be all you need in achieving success in your Affirmative Action Program.

A copy of your Plan has been forwarded to the Governor's Office for their records.

If the Oklahoma State Personnel Board EEO/AA Division can be of any assistance to you during implementation, training, etc., please feel free to contact our office.

Respectfully,

OKLAHOMA MERIT SYSTEM

Frank C. Burrell Personnel Specialist

FCB:klc

ATTACHMENT #2