2016
CLACKAMAS COUNTY
AFFIRMATIVE ACTION PLAN

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TABLE OF CONTENTS

SECTION I. AFFIRMATIVE ACTION PLAN FOR WOMEN AND MINORITIES 4

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT 5
OBJECTIVES OF THE COUNTY AFFIRMATIVE ACTION PLAN 6
DISSEMINATION OF POLICY 6
INTERNAL DISSEMINATION 6
EXTERNAL DISSEMINATION 7
RESPONSIBILITY FOR IMPLEMENTATION 7
AFFIRMATIVE ACTION OFFICER 7,8,9,10
RESPONSIBILITY OF MANAGEMENT STAFF 11

WORKFORCE ANALYSIS 12
AVAILABILITY ANALYSIS 13
TWO FACTOR ANALYSIS 13,14
INCUMBENCY vs. AVAILABILITY ANALYSIS 15
IDENTIFICATION OF PROBLEM AREAS 15,16
PERSONNEL PRACTICES & ACTIVITIES 17
RESULTS OF PREVIOUS YEARS' AFFIRMATIVE ACTION PLAN 17,18
ESTABLISHMENT OF GOALS 19,20
SUGGESTED ACTIVITIES FOR ACHIVING GOALS 21
RECRUITMENT 21,22
TRAINING 22
CREATING A WELCOMING WORKPLACE 23
AFFIRMATIVE ACTION/EQUITY, DIVERSITY AND INCLUSION AWARENESS PROGRAMS 23
COMMUNICATION OF AFFIRMATIVE ACTION 24
OTHER HUMAN RESOURCE ACTIVITIES 24
DEVELOPMENT AND EXECUTION OF ACTION PROGRAMS 25,26
INTERNAL AUDIT AND REPORTING SYSTEM 27
PERSONNEL PROCESS 27
GOALS 27
COMPLIANCE WITH SEX DISCRIMINATION GUIDELINES 28
RECRUTIING AND ADVERTISING 28
JOB POLICIES AND PRACTICES 28
SENIORITY SYSTEMS 28
CLASSIFICATION AND COMPENSATION 28,29
AFFIRMATIVE ACTION 29
SEX DISCRIMINATION AND COMPLAINT PROCEDURE 29
HARASSMENT POLICY 29
COMPLIANCE WITH RELIGIOUS AND NATIONAL ORIGIN DISCRIMINATION GUIDELINES 30
EQUAL EMPLOYMENT POLICY 30
ACCOMENDATIONS 30

SECTION II. AFFIRMATIVE ACTION PLAN FOR INDIVIDUALS WITH DISABILITIES **31**

POLICY STATEMENT 32

AFFIRMATIVE ACTION CLAUSE 32
APPLICABILITY OF PROGRAM REQUIREMENTS 33
PROPER CONSIDERATION OF QUALIFICATIONS 33,34
POST PLACEMENT SERVICES 34
OTHER PROCEDURAL AUDITS 35
PHYSICAL AND MENTAL QUALIFICATIONS 36
ACCOMMODATIONS 37
STRUCTURAL ACCOMENDATIONS 37
NON-STRUCTURAL ACCOMENDATIONS 37
OTHER ACCOMENDATIONS 37,38
COMPENSATION 38
OUTREACH, POSITIVE RECRUITMENT AND EXTERNAL DISSEMINATION OF POLICY 38,39
INTERNAL DISSEMINATION OF POLICY 39
RESPONSIBILITY FOR IMPLEMENTATION 40
DEVELOPMENT AND EXECUTION OF AFFIRMATIVE ACTION PROGRAMS 41

SECTION III. AFFIRMATIVE ACTION PLAN FOR DISABLED VETERANS, RECENTLY SEPARATED VETERANS, OTHER PROTECTED VETERANS, AND ARMED FORCES SERVICE MEDAL VETERANS 42

POLICY STATEMENT 43
AFFIRMATIVE ACTION CLAUSE 43
APPLICABILITY OF PROGRAM REQUIREMENTS 43,44
REVIEW OF PERSONNEL PROCESSES 44,45
PHYSICAL AND MENTAL JOB QUALIFICATION STANDARDS 46
REASONABLE ACCOMMODATIONS 46
COMPENSATION 47
HARASSMENT PREVENTION 47
OUTREACH, POSITIVE RECRUITMENT AND EXTERNAL DISSEMINATION OF POLICY 47
INTERNAL DISSEMINATION OF POLICY 47,48
RESPONSIBILITY FOR IMPLEMENTATION 48,49
DEVELOPMENT AND EXECUTION OF AFFIRMATIVE ACTION PROGRAMS 49

SECTION IV. APPENDICES 50

APPENDIX A - DESCRIPTION OF EEO JOB CATEGORIES 51,52
APPENDIX B - AFFIRMATIVE ACTION RESOURCE LIST 53,54,55
APPENDIX C - EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT 56
APPENDIX D - HARASSMENT POLICY STATEMENT 57,58

SECTION I.

AFFIRMATIVE ACTION PLAN FOR WOMEN AND MINORITIES

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

On March 13, 1978, the Board of County Commissioners approved the first Equal Employment Opportunity Policy Statement and Objectives for the County Affirmative Action Plan. The Clackamas County Board of Commissioners continues its commitment to the concept of equal employment opportunity as a necessary element of basic workforce management. Discrimination in personnel actions are prohibited. Employment decisions shall be made in accordance with the principles of equal employment opportunity by utilizing only job-related requirements and competencies. Local, state and/or federal law specifically prohibit discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, age, national origin, physical or mental disability, marital status, political affiliation, veteran status, or family relationship.

Equal opportunity can best be affected through definitive and programmed affirmative action. Every County employee must realize that policies to maintain equality cannot be merely passive. Positive action steps must be taken to maintain an environment which provides for equal employment opportunities.

The emphasis of the County's Affirmative Action Plan is to take positive steps to see that persons of an identifiable protected class are provided an equal opportunity to be successful in all phases of the employment process. The Board of County Commissioners believes that an effective Affirmative Action Program not only benefit those who may have been denied equal employment opportunity, but also greatly benefits those County departments and offices which may have overlooked, screened out, or under-utilized useful talent, resources and skills, especially among those of female and minority persons.

The Affirmative Action Plan commits all employees of Clackamas County to support, in an affirmative manner, the Board of County Commissioners' policy regarding equal employment opportunity. The County Affirmative Action Officer, who is the Director for Diversity, Equity and Inclusion the Office of the County Administrator, is charged with the responsibility for implementation of the Affirmative Action Plan. The County Affirmative Action Officer shall provide effective communication of and conformance with, the requirements of Affirmative Action and see that each department and office director takes such affirmative action as is necessary to achieve its goals. The Affirmative Action Plan shall be implemented consistent with executive orders as amended and other mandated requirements. The Board of County Commissioners and County Administrator shall annually review the affirmative action progress of the County.

All departments and offices will work together to develop and implement Countywide Affirmative Action goals and timetables consistent with, and supportive of, this policy. Each department and office, to facilitate the above provisions, shall appoint a high level manager to actively participate on the Affirmative Action Committee and to be responsible for implementing the County's Affirmative Action Plan.

OBJECTIVES OF THE COUNTY AFFIRMATIVE ACTION PLAN

1. To establish and maintain employment levels for minorities and females in proportion at least equal to their availability in the specified labor force;

2. To take affirmative action necessary to ensure representation throughout all EEO classifications in the County workforce;

3. To make efforts to prevent the occurrence of arbitrary, unnecessary and artificial practices which relate to employment decisions within Clackamas County's workforce;

4. To make efforts to develop and fully utilize existing females and minorities within the County workforce;

5. To communicate the County's policies and activities in affirmative action both internally and externally; and

6. To engage department directors in a plan to actively monitor, support and advance the County's Affirmative Action Program.

DISSEMINATION OF POLICY

In order to implement provisions of this policy and plan, it's necessary that County employees, the community at large, and contractors and subcontractors doing business with the County be informed of the County's Equal Employment Opportunity/Affirmative Action (EEO/AA) Policy.

INTERNAL DISSEMINATION

1. The Equal Employment Opportunity Policy Statement, Harassment Policy Statement (see Appendix C and D) and Federal EEO Notices will remain posted as required by Federal EEO notice.
2. All new employees will continue to be informed of the County's Equal Employment Opportunity Policy and the County's Affirmative Action Plan in new employée orientation sessions.
3. For printing and distribution purposes, this section contains the Workforce Analysis Summary pages only. The individual tables for each organizational unit have been omitted from copies of the Affirmative Action Plan to conserve paper, and are available upon request. All Affirmative Action Plans are reviewed and updated annually. Plans are available for inspection by any employee or applicant by contracting the County's Affirmative Action Officer between the hours of 7:00AM and 6:00PM, Monday through Thursday. The Affirmative Action Plan is also available on the County internet by clicking on the Jobs link and then on the Affirmative Action Plan (AAP) (PDF) link or on the intranet under My Departments – Employee Services – Personnel Links – Affirmative Action Plan.
4. A policy statement regarding Equal Employment Opportunity is incorporated in the Personnel Ordinance of Clackamas County.
5. Affirmative Action and the County Equal Employment Opportunity Policy are incorporated into supervisory and management training.
6. All collective bargaining agreements entered into with the County will continue to contain nondiscrimination clauses.
7. The County will keep union officials informed of the County's commitment to affirmative action.
8. The County will make a good faith effort to feature a diverse representation of employees in County publications.

EXTERNAL DISSEMINATION

1. Recruitment contacts will continue to be informed of the County's EEO Policy. These contacts will be encouraged to actively recruit and refer minorities and females for all County positions.
2. All contractors and subcontractors maintaining contracts with Clackamas County will continue to be advised in writing of the County's Equal Employment Opportunity Policy and Affirmative Action Program. All newly negotiated contracts will contain an equal opportunity clause.
3. All Clackamas County job announcements will continue to indicate that Clackamas County is an equal opportunity employer by containing the phrase "An EEO/AA Employer."
4. All purchase orders, leases and contracts administered by the County will continue to incorporate an Equal Employment Opportunity Statement.
5. An Employee Services representative is available to meet with applicants to view recruitment processes and examination results. In the event an internal or external applicant requests a review of their employment status or application materials, a process is established by which the County's Department of Employee Services will investigate and render a decision.
6. Any department/office's specific Equal Employment Opportunity Plan (EEOP) will be accessible to any member of the public or employee by requesting a copy from the County's Department of Employee Services. The Federal Department of Justice requires EEOP plans when receiving certain federal funding. The Sheriff's Department EEOP plan will be posted on the Sheriff's web site.

RESPONSIBILITY FOR IMPLEMENTATION

The County's Affirmative Action Officer will provide effective communication of the intent and requirements of this plan and will work with departments and offices to ensure that each department director takes affirmative action that is necessary to achieve the plan goals. If there are any complaints regarding failure to comply with the EEO/AA Plan or the intent thereof, the County's Affirmative Action Officer is authorized to investigate as the agent of the Board of County Commissioners to ensure compliance.

County Administration serves as the focal point for all Affirmative Action compliance. The County's Affirmative Action Officer will work to establish positive working relationships with departments and offices to assist them in meeting affirmative action, requirements, and objectives.

AFFIRMATIVE ACTION OFFICER

The Affirmative Action Officer working in conjunction with the Department of Employee Services ensures that the following functions are carried out:

A. Recruitment and Selection

1. Maintain community contacts and public relations.

2. Analyze selection procedures to ensure they do not have an adverse impact on protected classifications.

3. Develop recruitment methodologies that ensure compliance with Equal Employment Opportunity and Affirmative Action.

4. Maintain internal procedures for handling complaints and for collecting and evaluating information relative to the selection process.

5. Maintain a good faith effort to include minority and female raters in the examination and selection process.

6. Implement affirmative action outreach recruitment efforts that effectively attract qualified minorities and females. See Appendix B for resources that are utilized on a regular basis to solicit minority and female applicants for County jobs.

7. Periodically evaluate the selection procedure for recruitments, including the online application form, interview procedures, test administration, test validity, referral procedures and the final selection process to strengthen the recruitment process and to aide equal employment opportunity goals and objectives. No examinations will be issued without prior analysis of the duties and responsibilities of the position and the establishment of job related qualifications and testing requirements and procedures.

8. Ensure that all essential and minimum qualifications are necessary prerequisites and not merely desirable qualifications for the job.

9. Continue to establish alternate patterns for qualifications where additional experience may compensate for desired education.

10. Consider non-standardized written examinations; encourage performance examinations, audiovisual, and/or oral examination methods.

11. As required by the Uniform Guidelines on Employee Selection Procedures, analyze content or other appropriate validity of written tests where they have an adverse impact with respect to every group that constitutes 2% or more of the relevant labor market.

12. Conduct a job analysis to identify technical knowledge, skills, abilities, interpretation, translation, and personal/interpersonal competencies necessary for success in the position. Ensure oral examinations are structured to test the technical and personal/interpersonal competencies of the applicant according to Competency-Based Interviewing guidelines.

13. Train all raters prior to serving on oral examination boards in appropriate selection procedures and inform raters of the County's EEO/AA program requirements.

14. Make a good faith effort to periodically audit and review notification and certification procedures used by departments and offices and report any problems to the County Administrator and or Board of County Commissioners.

B. Classification and Compensation

1. Maintain the classification plan in such a manner that it adheres to the principals of equal employment opportunity and affirmative action. Evaluate duties, responsibilities and tasks performed in each classification to determine the necessary job related knowledge, abilities and skills required for entry into the classification and ensure that those are accurately reflected in the classification specifications.

2. On an ongoing basis, strengthen and update career opportunities.

3. Use knowledge and skill requirements wherever possible as criteria for promotion in lieu of additional education. Education and experience requirements will not be utilized in classification specifications as basic requirements unless specifically required by law. When law requires specific education, experience, or licensing criteria, an analysis will be made of the job relatedness of the criteria based upon the actual duties performed. The required knowledge and skills will continue to reflect minimum qualifications and not merely "désirable qualifications" for the job.

4. Continue to clearly identify required knowledge and skills on each classification specification.

5. Continue to look at job restructuring as a tool for facilitating entry and promotion of the "protected" classifications into County employment. Job restructuring provides for classifications that offer employment opportunities at all intervals to match the wide range of skills possessed by current and prospective employees.

6. Maintain entry level classifications where appropriate and applicable.

7. Create transitional classifications for Technical and Paraprofessional levels as a means of upward mobility to higher level jobs whenever possible.

8. Maintain descriptive and nonsexist job titles. Job titles are created which reflect a change from an orientation of "man" non-job related wording to that which more accurately describes the work performed.

9. Continue to explore new classification concepts designed to promote growth of employees and to provide opportunities for career advancement to all who are qualified. In the analysis of positions, classification shall be made on the basis of the duties and responsibilities of the position and not on the current incumbent.

10. Information gained in the classification analysis will be utilized in the employment and examination process. Whenever possible, entry-level classifications will be allocated to facilitate training of minorities, women and other protected group members.

C. Equity, Diversity, and Inclusion

1. Maintain an Affirmative Action Plan for the County including updating of goals and timetables that are in compliance with Executive order No. 11246, as amended and implementing regulations.

2. Maintain internal procedures to ensure full compliance with this plan.

3. Monitor compliance with the goals and timetables as established in the Affirmative Action Plan and undertake appropriate activities to remedy deficiencies.

4. Develop policies and procedures for the Board of County Commissioners' approval, which properly implement and maintain the Affirmative Action Program.

5. Field inquiries regarding complaints of discrimination and harassment and refer them to the County's Department of Employee Services for follow-up.

6. Provide consultation to employees, departments or offices regarding the Affirmative Action Plan, as well as equity, diversity and inclusion concerns.

7. Ensure the personnel policies developed for Clackamas County affirms the intent of equal employment opportunity and affirmative action.

8. Keep management, County Administration and elected officials informed of any new developments in the area of Equal Employment Opportunity law and Affirmative Action.

9. Keep departments and offices informed of required EEO postings.

D. Training

1. All Employees

   Inform all new employees of the County's commitment to Equal Employment Opportunity Policy and Affirmative Action in employee orientation sessions.

2. Directors, Manager's and Supervisor's

   Develop and administer trainings about EEO/AA program and general requirements of the law including:

   a) Recruitment, selection, and promotion and its legal implications;

   b) Work performance evaluation; and

   c) Equity, diversity, and inclusion awareness programs.

3. Skills Training

   The Department of Employee Services will work with departments to provide general countywide skill training and to assist departments in identifying and meeting their training needs. Individual departments and offices working in conjunction with their employees will be encouraged to adopt training and development plans that will enhance opportunities for employees to compete for promotional and career opportunities.

AFFIRMATIVE ACTION REPRESENTATIVES

As indicated by the general policy statement, all County departments and offices will participate in the development and implementation of the Countywide Affirmative Action Plan including its goals and timetables. Each department and office director will designate a manager to serve as their Affirmative Action representative. The representative will be responsible for contributing to County goals and timetables within the Countywide Affirmative Action Plan. Specifically, the responsibilities of these representatives are to:

1. Keep Division Directors within the department or office aware of progress and performance towards meeting the goals and timetables in the Affirmative Action Plan;

2. Rely upon the recruitment efforts managed by the Department of Employee Services;

3. Annually revise, review and evaluate their progress toward meeting the County-wide Affirmative Action goals and timetables;

4. Identify and report to their director and the Affirmative Action Officer any operational problems or deficiencies impeding progress toward goals and timetables.

RESPONSIBILITY OF MANAGEMENT STAFF

All County managers are responsible for assisting in the advancement of the County's Affirmative Action Program. Management responsibilities are to include and are not limited to the following:

1. Assist in the identification of problem areas and work with the Affirmative Action Officer to overcome any deficiencies.

2. Ensure appropriate updates are communicated.

3. Take action to prevent harassment of employees.

4. When participating in the recruitment and selection process, establish questions and criteria that are free of bias and discrimination.

5. When participating in the recruitment and selection process, uphold Federal, State, County and city régulations that prohibit discrimination and adhere to the County's Affirmative Action Plan.

6. For positions that are subject to Oregon Law Chapter 559, House Bill 3025, the County's initial application for employment does not solicit information regarding criminal convictions. Upon disclosure, convictions are evaluated for each position and the existence of a criminal conviction record is not necessarily disqualifying. The County's policy in regards to the continued employment or hiring of individuals with criminal records considers the individual circumstances of the conviction, and the nature of the position.

7. When participating in the selection process, evaluate all applicants equally against the established criteria.

8. Ensure equality and equity are considerations in hiring, promotion, transfer, pay, termination and other personnel actions.

9. Work performance is evaluated on the basis of non discrimination.

WORKFORCE ANALYSIS

As part of the Affirmative Action Plan, a workforce analysis will be completed. The workforce analysis includes a table for each organization unit, which lists all regular status, occupied positions in Clackamas County.

The positions within each organization are listed from lowest to highest paid by the maximum hourly rate of the salary range. The workforce analysis also provides information on the EEO category designation, the salary range, number of incumbents, and minority and female representation in the positions. The tables provide a method for reviewing the utilization of minorities and females in each organization unit and by classification.

Note: For printing and distribution purposes, this section contains the Workforce Analysis Summary pages only. The individual tables for each organizational unit have been omitted from copies of the Affirmative Action Plan to conserve paper, and are available upon request. All Affirmative Action Plans are reviewed and updated annually. Plans are available for inspection by any employee or applicant by contracting the County's Affirmative Action Officer between the hours of 7:00AM and 6:00PM, Monday through Thursday. The Affirmative Action Plan is also available on the County internet by clicking on the Jobs link and then on the Affirmative Action Plan (AAP) (PDF) link or on the intranet under My Departments – Employee Services – Personnel Links – Affirmative Action Plan.

AVAILABILITY ANALYSIS

TWO FACTOR ANALYSIS

A crucial portion of an Affirmative Action Plan is the availability analysis. This is a study of the number of minorities and females available for positions with the County. The percentage of minorities and females available is measured by two factors: external availability from those having requisite skills in the reasonable recruitment area and internal availability from among current employees who are promotable, trainable or transferable within the County.

Factor	**Percentage of. . .**	**Among. . .**	**In the. . .**
1	Minorities and Females	Those having requisite skills	Reasonable recruitment area based on the 2000 Census.
2	Minorities and Females	Those promotable, trainable, or transferable	Facility

The two-factor analysis was applied to each EEO category. Value weights were assigned to each factor. The value weight reflects the proportion of the factor in calculating overall availability for each EEO category. After determining the value weight for each factor, this number was then multiplied by the raw availability figure. These weighted availabilities were then added to derive final availability figures for females and minorities in each EEO category.

The 2016 Affirmative Action Plan relies upon the year 2010 Census Data for Factor 1. Each county classification title was assigned to one of the occupational codes for the 2010 census to accurately measure availability of external applicants with the requisite skills to perform the various county occupations. In addition, the County examined the external vs. internal applicant pool for each EEO Category in determining the value weights to assign to each Factor in the Availability Analysis.

Data for Factor 1 considers those persons in the external recruitment area that have requisite skills for each classification included within the EEO category. All of the County's classifications were compared to the occupational codes provided in the 2010 census. By assigning one code to each classification, the availability data more accurately reflects the mix of jobs and job skills in the County workforce. The census data is weighted based on the number of incumbents in each classification. The value weight assigned to Factor 1 reflects the proportion of applicants external to the organization. This value weight may differ between EEO Categories.

For EEO 1, Officials and Administrators, census data from the United States census was used. For EEO categories 5, 6 & 8, census data was used from Portland PMSA since applicants for paraprofessional, clerical support and service maintenance positions rarely arrive from outside this area. For all other EEO categories Oregon census data was used as the reasonable recruiting area.

Data for Factor 2 considers those promotable, trainable or transferable within the County. The raw availability figures are derived from the percentage of minorities and females present in the work force in the EEO category providing the applicant pool. These are known as "feeder groups." Information received from the Equal Employment Opportunity Commission indicates that it is inappropriate to utilize an EEO category as a feeder unto itself. Therefore the County identified whether each EEO category had a feeder group in a different EEO category.

The chart below identifies each EEO category with its feeder EEO groups

EEO Category	Feeder EEO Category
EEO 1	EEO 2
EEO 2	EEO 5 and 6
EEO 3	EEO 7 and 8
EEO 4	EEO 5 and 6
EEO 5	EEO 6
EEO 6	No Feeder Group
EEO 7	EEO 8
EEO 8	No Feeder Group

INCUMBENCY vs. AVAILABILITY ANALYSIS

The Incumbency vs. Availability Analysis compares the County's work force composition to the weighted availability percentages and identifies job groups in which the numbers of minorities or females are less than would be reasonably expected. For this analysis, the Office of Federal Contract Compliance Program identifies several approved methods of determining whether underutilization exists. The County generally identifies the Two Standard Deviation rule as its method. Under this rule, underutilization is declared when the number of females or minorities in the EEO category is more than two standard deviations below the availability of that group. When the standard deviation exceeds two standard deviations from parity, a hiring goal is required. This rule is also based on the observation that some degree of departure from exact parity will occur naturally.

Each of the County's EEO categories contains a large enough workforce for an accurate indication of underutilization to occur using the Two Standard Deviation rule. For the 2016 plan year the Board of County Commissioners (BCC) endorsed the setting of hiring goals for any EEO categories that had underutilization exceeding the -2.00 standard deviation rule. There are five EEO categories with underutilization of females and/or minorities: EEO2 Professionals, EEO 3 Technicians, EEO 4 Protective Services, EEO 7 Skilled Craft, and EEO8 Service/Maintenance.

All County employee information is based on data as of September 28, 2015.

IDENTIFICATION OF PROBLEM AREAS

This summarizes both the utilization and availability figures for each EEO category. It also clearly identifies underutilization based on the Two Standard Deviation Rule.

EEO 1 - OFFICIALS AND ADMINISTRATORS

EEO category 1 is a relatively small group of 52 employees, including department directors, division directors and high level managers. The representation of females (19) is slightly below the availability, and reflects a representation of -0.9 standard deviation.

The County has no underrepresentation of minorities in this category. The minority representation (7) is within two standard deviations at -0.73 standard deviation. *Therefore, no Affirmative Action goal is necessary.* However, outreach efforts should continue for recruitments to increase the County's applicant pool for this category.

EEO 2 - PROFESSIONALS

This is the County's largest EEO category with 567 total employees. The representation of females (362) in this category reflects a workforce slightly exceeding availability at 63.84% and is 1.10 standard deviation. *Therefore, no Affirmative Action goal is necessary.*

The representation of minorities (53) is -3.30 standard deviation. The County would need to see a net increase of 11 minorities to bring the County within 2 Standard Deviation. ***This EEO category for minorities requires a hiring goal.***

EEO 3 - TECHNICIANS

A total number of employees in this category is (176). The County's representation of females in this category (64) is 36.36%, which is slightly higher than availability, and is 0.11 Standard Deviation. *Therefore, no Affirmative Action goal is necessary.*

The representation of minorities in this category is (13), and is at -2.84 standard deviation. The County would need to see a net increase of 4 minorities to bring the County within 2 Standard Deviation. ***This EEO category for minorities requires a hiring goal.***

EEO 4 - PROTECTIVE SERVICE WORKERS

This is the second largest EEO category in the County with 397 employees. This category continues to experience significant underrepresentation of females and total minorities. The representation of females (76) is at -2.98 standard deviations. The County would need to see a net increase of 14 females to bring the County within 2 Standard Deviation. ***This EEO category for females requires a hiring goal.***

The representation of minorities (35) is also significant at -3.08 standard deviation. The County workforce would need to see a net increase of 8 minorities to bring the County within 2 Standard Deviation. ***This EEO category for minorities requires a hiring goal.***

EEO 5 - PARAPROFESSIONALS

This category has (219) employees. The representation of females in this category (197) is above the availability, and is at 4.05 standard deviation. *Therefore, no Affirmative Action goal is necessary.*

The representation of minorities of in this category (37) is above availability as well, and is at 0.28 standard deviation. No underutilization requiring a hiring goal is identified. *Therefore, no Affirmative Action goal is necessary.* However, outreach efforts should continue for recruitments to increase the County's internal labor pool for promotions to other EEO categories.

EEO 6 - OFFICE AND CLERICAL WORKERS

This EEO category has (209) total employees. As has been reflected in the past, the representation of females (193) is above availability at 3.03 standard deviation. *Therefore, no Affirmative Action goal is necessary.*

There are (38) minorities in this EEO category and is at 1.47 standard deviation. *Therefore, no Affirmative Action goal is necessary.* However, outreach efforts should continue for recruitments to increase the County's internal labor pool for promotions to other EEO categories.

EEO 7 - SKILLED CRAFT WORKERS

In this EEO category there are (109) employees. The number of females is 4 and is at -0.59 standard deviation. *Therefore, no Affirmative Action goal is necessary.*

Minorities total (9) for this EEO category and is at -2.45 standard deviation. The County would need to see a net increase of 10 minorities to reach availability figures. The County workforce would need to see a net increase of 2 minorities to bring the County within 2 Standard Deviation. ***This EEO category for minorities requires a hiring goal.***

EEO 8 - SERVICE MAINTENANCE WORKERS

A total number of (83) employees represent this EEO Category. The representation of females (16) in this category reflects a workforce slightly exceeding availability 19.28%, and is at 0.18 standard deviation. *Therefore, no Affirmative Action goal is necessary.*

The total number of minorities is (6) and is at -4.07 standard deviation. The County would need to see a net increase of 18 minorities to reach availability figures. The County workforce would need to see a net increase of 10 minorities to bring the County within 2 Standard Deviation. ***This EEO category for minorities requires a hiring goal.***

Outreach efforts will continue for all categories to keep pace with availability of minorities in the labor market.

PERSONNEL PRACTICES & ACTIVITIES

The information presented in this chapter indicates that the availability of minorities with the requisite skills to match the occupations at Clackamas County increased significantly between the 2000 and 2010 census. This increased availability of minorities in the labor market greatly exceeded the County's moderate gains in the workforce representation of minorities. Through the establishment of hiring goals and increased outreach efforts, the County continues to work toward the goal of employing minorities at levels consistent with the representation in the labor market. There is only one EEO category with under-representation of females exceeding two standard deviations from availability (EEO 4 Protective Services). There are five categories with under-representation of minorities beyond two standard deviations (EEO2 Professionals, EEO3 Technicians, EEO 4 Protective Services, EEO7 Skilled Craft, and EEO8 Service/Maintenance).

In keeping with the County's commitment to equal employment opportunity, we will continue to examine our work force composition and applicant flow and establish goals, where appropriate, in order to improve the representation of females and minorities at all levels.

RESULTS OF PREVIOUS YEARS' AFFIRMATIVE ACTION PLAN

For prior year plan year (2014/2015), we anticipate some turnover due to increased retirements. The County budget is expected to add only a number of new positions this fiscal year when compared to the past three years.

The annual measurement of workforce composition taken in August 2014 shows some progress towards meeting the hiring goals in the 2013 AA plan. This summary shows that utilization percentages of females increased in the following EEO categories: 1, 2, and 7. Utilization percentages for minorities increased in EEO categories: 3, 4, 6, and 8.

EEO 1 - Officials and Administrators
The percentage of females in this category's workforce is 39%, which slightly exceeds availability. There were no 2013 hiring goals for this category for females or minorities. The category had a net decrease of one (1) minority and zero (0) females.

EEO 2 - Professionals
There was a hiring goal set in 2013 for twelve (12) minorities for this category. The category had a net decrease of two (2) minorities and net increase of six (6) in the number of females. There will continue to be a hiring goal for minorities for 2014.

EEO 3 - Technicians
There was a hiring goal set in 2013 for two (2) minorities for this category. The category had no change in the number of minorities and net decrease of two (2) in the number of females. There will continue to be a hiring goal for minorities for 2014.

EEO 4 - Protective Service
There was a goal established in the 2013 plan to hire five (5) females and four (4) additional minorities to this category. Overall, there was a net increase of one (1) total employee in this category. This category saw a net decrease of three (3) females. This category had a net increase of six (6) minorities. There will continue to be a hiring goal for minorities and women for 2014.

EEO 5 - Paraprofessional

The percentage of females in this category's workforce is over 87%, which exceeds availability. There were no 2013 hiring goals for this category for females or minorities. The category had a net decrease of thirteen (13) total employees, including twelve (12) females and four (4) minorities.

EEO 6 - Office and Clerical

The percentage of females in this category's workforce is over 91%, which exceeds the 85.17% availability. The percentage of minorities in this category's workforce is over 13%, which is slightly below the 14.73% availability. There were no 2013 hiring goals for this category for females or minorities. The category had a net decrease of twelve (12) females and one (1) minority.

EEO7 - Skilled Craft

There was a hiring goal set in 2013 for two (2) minorities for this category. No hiring goal was set in 2013 for hiring females. The category had a net decrease of one (1) minority and zero (0) change in the number of females. There will continue to be a hiring goal for minorities for 2014.

EEO8 - Service Maintenance

There was a hiring goal set in 2013 for two (2) minorities for this category. The category had a net decrease of one (1) minority and zero (0) females. There will continue to be a hiring goal of for minorities for 2014.

ESTABLISHMENT OF GOALS

The Affirmative Action Officer recommended these goals as appropriate and in accordance with Affirmative Action statistical principles, and has received approval from Clackamas County's Board of Commissioners for Affirmative Action Plan Year 2016. These goals will be communicated to the County Administrator and well as County management.

The two standard deviation method has historically been used to determine if there is a need to establish a goal for any EEO Category. The Office of Federal Contract Compliance (OFCCP) guidelines attempted to set "reasonable and attainable" hiring goals in consideration of the expected recruitment opportunities for the job category. A BCC adopted hiring goal in a job category triggers an opportunity to refer additional candidates from eligibility registers under the County's Personnel Ordinance. Therefore such hiring goals are reserved for situations of significant underutilization from availability.

EEO 1 - Officials and Administrators

Underrepresented Group = None Requiring a Hiring Goal
2014/15 AA Goal = None

Both females and minorities are utilized in this category at a level either above availability or not significant enough to require a hiring goal.

EEO 2 - Professionals

Underrepresented Group = Minorities
2014/15 AA Goal = Ten (10) Minorities

Underrepresentation of minorities is at -3.30 standard deviation. A hiring goal of eleven (11) is established. This includes a stretch goal of 1 minority that has been established given the relationship to number of additional minority or female employees that would bring the County within 2 Standard Deviation.

EEO 3 - Technicians

Underrepresented Group = Minorities
2014/15 AA Goal = Three (3) Minorities

Underrepresentation of minorities is at -2.84 standard deviation. A hiring goal of eleven (4) is established. This includes a stretch goal of 1 minority that has been established given the relationship to the number of additional minority or female employees that would bring the County within 2 Standard Deviation.

EEO 4 - Protective Service

Underrepresented Groups = Females and Minorities (required goals)
2014/15 AA Goal = Thirteen (13) Females and seven (7) Minorities

Protective Service positions are located mainly in two County departments: Sheriff and Community Corrections. Additional positions are located in the Dog Services Division of DTD. Since many positions in this category are entry level, active recruitment of minorities and females is essential in order to achieve parity. Both Community Corrections and the Sheriff's Office have established eligibility registers for use in hiring.

For females a hiring goal of eleven (14) is established. This includes a stretch goal of 1 female that has been established given the relationship to the number of additional minority or female employees that would bring the County within 2 Standard Deviation.

For minorities a hiring goal of eleven (8) is established. This includes a stretch goal of 1 minority that has been established given the relationship to the number of additional minority or female employees that would bring the County within 2 Standard Deviation.

EEO 5 - Paraprofessional

Underrepresented Groups = No Hiring Goal Necessary
2014/15 AA Goal = None

Both females and minorities are represented in this category and do not exceed 2 Standard Deviation.

EEO 6 - Office and Clerical

Underrepresented Groups = No Hiring Goal Necessary
2014/15 AA Goal = None

Both females and minorities are represented in this category and do not exceed 2 Standard Deviation.

EEO 7 - Skilled Craft

Underrepresented Group = Minorities
2014/15 AA Goal = Three (3) Minorities

Underrepresentation of minorities is at -2.45 standard deviation. A hiring goal of eleven (2) is established. No stretch goal has is established given the historical difficulty the County has had in recruiting skilled craft minority workers.

EEO 8 - Service Maintenance

Underrepresented Group = Minorities
2014/15 AA Goal = Five (5) Minorities

Underrepresentation of minorities is significant at -4.35 standard deviation. A hiring goal of eleven (5) is established. No stretch goal has is established given the historical difficulty the County has had in recruiting skilled craft minority workers. The goal of (5) is a stretch goal given the historical difficulty the County has had in recruiting skilled craft minority workers.

SUGGESTED ACTIVITIES FOR ACHIEVING GOALS

RECRUITMENT

- The County will email a weekly job listing to targeted organizations in the Affirmative Action Mailing List (see Appendix B). Additional organizations will be continually identified and added to the County's mailing list.
- Increase visibility at job fairs to communicate the County's commitment to Equal Employment and inclusion. Minority employees in various County departments will be asked to partner with staff from the Department of Employee Services when attending job fairs. Attendees will receive "career counseling" on County hiring opportunities that match their individual skills.
- Employment opportunities with the County will be advertised in local community newspapers for recruitments targeted for expanded outreach.
- Continue to make an effort to have the County's workforce reflect the changing population being served by hiring staff who can directly communicate with non-English speaking individuals without needing a third-party translator. In the absence of bilingual staff, seek interpreters to assist in delivery of services.
- Departments will continue to identify positions that require bilingual skills, particularly Spanish-English language skills to serve Hispanic populations. Specialized recruitment efforts will be made to meet this need.
- To attract minorities and females the County will make site visits to deliver presentations and answer questions at the Urban Leagues, local one-stop career centers and other organizations that have frequent minority contacts that are actively seeking employment.
- Management will attend meetings and develop business contacts of community organizations and advocacy groups that serve minority persons.
- Attention will be given to the hiring of minorities in temporary positions or as interns. Encourage departments to post temporary and intern positions externally, through minority newspapers or through local one-stop career centers to increase minority applicants for these positions. Distribute job postings to various colleges, training schools, churches and community centers.
- Employee Services will continue to post a separate job listing site on the County's Internet page to allow postings of temporary positions, internships and volunteer opportunities.
- Management will increase recruitment efforts for classifications where there are affirmative action goal(s). This effort will be coordinated with department hiring managers and may include additional advertising in minority newspapers and outreach efforts.
- Employee Services will include a reference to the affirmative action goals on every job opening form that is activated for recruitment or referral of names from an eligibility register. This notice is returned to the hiring managers for their awareness of hiring goals. The existence of hiring goals will be used to develop an effective outreach recruitment plan as well as provide additional referrals from the eligibility register under the policies of the County Code/Personnel Ordinance.
- Employee Services will comply with the County's Personnel Ordinance as amended in November 2004 by referring additional names of eligible female and minority applicants where there is a required hiring goal in the adopted AA Plan.
- Accommodate applicants with disabilities by offering assistance in completing application materials and by providing reasonable accommodation in the testing process.

- Provide assistance to applicants through various methods by offering assistance in completing the on-line application and other required materials.
- Post County Job Openings in Department of Employee Services so citizens can review.
- Provide informational workshops and training to citizens on how to gain County employment.
- Encourage employees attending community events and meetings to market the County as an employer and share current employment opportunities.
- Use social media (Facebook, Twitter, etc.) to promote employment opportunities and encourage applicants to sign up at job fairs and other diversity events.
- Encourage County employees to develop personal connections with minorities in the community.
- Efforts will be made to include minority raters in the Oral-board interview process.
- A final activity to achieve hiring goals during the selection process will be the development of a comprehensive training program for potential oral board raters prior to serving on oral board panels. The program would contain training on Affirmative Action and Equal Employment issues. Raters in oral board examinations as well as department employees on selection committees need to be adequately informed of the County's policy and Affirmative Action goals for the year.

TRAINING

- Promote general skills training for all employees to increase competitiveness for promotion. The County offers comprehensive training programs that provide general skills training, lead worker and supervisory training.
- Encourage employees to apply for promotional opportunities by providing developmental and career development opportunities.
- Provide interview skills training and coaching to employees interested in promotional opportunities.
- Encourage women and minorities to take advantage of the training courses in the County.
- Encourage employees to participate in activities that will expose them to diversity and cultural differences, which will help to better understand each other.
- Develop apprenticeships to attract trainee level employees or allow current employees to try new career paths. Explore the development of programs that would allow employees to submit their interest in learning about County jobs that are outside of their current job family.
- Encourage managers and supervisors to have discussions with their employees surrounding career goals and promotional opportunities. Encourage supervisors to develop career planning in employee performance evaluations. Foster an atmosphere that encourages the development of individual goals and interests in support of job responsibilities.
- Provide equity, diversity and inclusion training to all employees and specifically to managers responsible for hiring regular and temporary employees.
- Utilize the County newsletter, INSIGHTS, and County e-mail to communicate supervisory and leadership principles.
- Encourage departments to offer training opportunities for all employees and to communicate openly how employees will be selected for training opportunities to eliminate perception of inequities.

CREATING A WELCOMING WORKPLACE

- Continue to provide the County's New Employee Orientation program to welcome new employees to the County workplace.
- Review the physical appearance of County buildings and lobbies to showcase a professional atmosphere. Encourage departments to showcase support of teamwork, customer service and diversity issues through artwork, slogans, pictures and posters in public lobbies.
- Continue to improve facility consolidation and improvement of disabled access for all County facilities.
- Encourage County departments to "On-Boarding" concepts that can assist new employees feel welcomed and oriented to the department.
- Continue to have the County's Affirmative Action Officer attend New Employee Orientation and New Supervisor Orientation to offer an orientation on how to access programs and feel welcomed.
- Communicate how employees may access the Affirmative Action Officer to discuss concerns in the work environment.

AFFIRMATIVE ACTION/EQUITY, DIVERSITY, AND INCLUSION AWARENESS PROGRAMS

- Continue to educate employees in the areas of equity, diversity and inclusion, Affirmative Action, Equal Employment Opportunities and Americans with Disabilities Act (ADA).
- Recognize the County's minorities and females in non-traditional jobs. Publish articles and photos in the County newsletter, Insights, and outside publications.
- Access the County's Cable network and other media types to advance the County's public image in relation to Affirmative Action goals and progress.
- Measure the effectiveness of employees' participation in equity, diversity and inclusion activities.
- Support County, regional and statewide equity, diversity and inclusion committees and encourage employees to become members and/or participate in conferences, workshops or seminars.
- Assist in identifying potential problem areas in departmental practices and procedures and act as a resource for finding solutions to those problems.
- Promote a positive discrimination-free climate and work environment where each employee's rights are respected.
- Evaluate the County employee groups that are currently meeting with diversity groups and/or diverse community organizations and encourage other employees to join these groups.
- The County is an active participant in external diversity events such as Say Hey, NW and Breakfast of Champions.
- Include positive statements about County employment in advertisements for County jobs. Market County employment to minority communities.
- Employee Services will support departments in the creation and maintenance of Equal Employment Opportunity Plans (EEOP) when these are required. Several EEOP's have been developed to support receipt of Federal and State Department of Justice grants. Plans are in place for the Sheriff's Office, Juvenile Department and District Attorney's Office.

COMMUNICATION OF AFFIRMATIVE ACTION

- The Department of Employee Services will continue to promote equity, diversity and inclusion awareness and the need to achieve the goals established for the current year to all supervisors and departmental directors.
- The County will publish article(s) on Affirmative Action in Insights. The article will communicate to all employees on the progress being made toward correcting under-utilization and the goals set for the current year.
- All Affirmative Action Plans are reviewed and updated annually. Plans are available for inspection by any employee or applicant by contracting the County's Affirmative Action Officer between the hours of 7:00AM and 6:00PM, Monday through Thursday. The Affirmative Action Plan is also available on the County internet by clicking on the Jobs link and then on the Affirmative Action Plan (AAP) (PDF) link or on the intranet under My Departments – Employee Services – Personnel Links – Affirmative Action Plan.
- Develop a section on the internet/intranet page noting Clackamas County's commitment to achieving diversity.
- Incorporate the County's commitment to diversity and diversity programs within the County business plan.

OTHER HUMAN RESOURCE ACTIVITIES

- The Department of Employee Services will continue to monitor the results of the Exit Interview Program. Results from this program will be examined periodically to determine retention strategies.
- Go beyond recruitment(s). Inform specific minority communities about career opportunities and types of skills required for various positions with the County.

DEVELOPMENT AND EXECUTION OF ACTION PROGRAMS

The following are steps that are undertaken to ensure the proper execution of the County's Affirmative Action Plan.

1. Classification specifications are developed and reviewed on an ongoing basis to ensure that all classification requirements:

    a) Accurately reflect job functions.

    b) Are valid, contain job performance-related criteria, and that neither minority nor female employees are required to possess higher qualifications than listed on the classification specification.

    c) Are free from bias because of race, color, religion, sex, disability status, age, national origin, or marital status and other protected classes.

2. Human resource planning is utilized to develop staffing strategies that support the County's affirmative action goals.

3. The County maintains and utilizes an affirmative action resource list when conducting any external recruitment(s). These are recruitment sources that are prepared to refer minority and female candidates. Representatives from these recruitment sources may be provided with briefing sessions on the County, tours of the County facilities, descriptions of job announcements and classification specifications, and an explanation of the overall selection process. (See appendix B for a copy of the mailing list.)

4. Minority and female job applicants are provided equal opportunity for hire.

5. Minority and female employees are provided equal opportunity for promotion and transfer.

6. The entire selection procedure is periodically reviewed to ensure freedom from bias.

7. Members of oral board panels are selected to include representation by minorities and females whenever possible. Furthermore members of the oral board panels are advised of the County's Affirmative Action Plan and trained in selection procedures, which uphold the intent of the plan.

8. The total selection process, including both scored and un-scored procedures are reviewed and analyzed on an ongoing basis to ensure freedom from bias and to aid in the achievement of EEO/AA goals and objectives. All personnel involved in recruiting, screening, selection, promotion, discipline, termination, and related processes are carefully selected and trained to ensure elimination of bias in all personnel actions.

9. When pictorial recruitment brochures are utilized, minority and female members of the workforce shall be included.

10. All internal openings, promotional and transfer opportunities shall be communicated by email and/or County Intranet site accessible to all employees.

11. Career counseling is available to all employees without regard to race, color, religion, sex, sexual orientation, national origin, disability status, marital status, age or other protected statuses.

12. Approved classification specifications for all classifications at Clackamas County are maintained by the Department of Employee Services and are available to all employees and those involved in any phase of the

employment process.

13. The Department of Employee Services validates classification specifications using job performance criteria. Detailed position analysis is conducted to ensure that classification specifications accurately reflect position functions.

14. The Department of Employee Services has the responsibility to maintain Affirmative Action software, track statistics, and generate all reports related to the Affirmative Action Plan, and keep the Affirmative Action Office apprised of the progress made toward achieving the County's goals.

15. The following training programs are provided:

    a) Members of oral board panels and all managers and supervisors involved in a recruitment and selection procedure learn skills to enable them to conduct effective, legal interviews.

    b) Management staff members are trained regarding their responsibilities outlined in the Affirmative Action Plan and applicable State and Federal EEO laws.

    c) Courses are periodically made available to management staff in the area of performance management.

    d) County-sponsored training is made available to all employees without regard to race, sex, ethnicity, religion, national origin, disability status, age, marital status or other protected statuses.

16. Recruitment efforts include special outreach to attract women and minorities.

INTERNAL AUDIT AND REPORTING SYSTEM

PERSONNEL PROCESS

All personnel processes are monitored on an ongoing basis to ensure adherence to nondiscriminatory employment practices. The results of these processes are compared with legal requirements. Problem areas are identified and reviewed by the Affirmative Action Officer in order to plan for actions that will improve or eliminate these problems. Plans and results are monitored and reported to management and those involved in the screening process.

GOALS

1. Progress toward achievement of established goals is monitored on an ongoing basis by the County's Affirmative Action Officer.

2. The Department of Employee Services develops affirmative action status reports annually for the County's Affirmative Action Officer.

3. Departmental affirmative action representatives are advised of program effectiveness and ways to improve unsatisfactory progress.

INTERNAL AUDIT AND REPORTING SYSTEM

The following processes are now being undertaken. Additional systems will be designed and implemented as needed.

1. Steps are taken to see that internal applicants for promotions and transfers are given full consideration.

2. The Department of Employee Services conducts exit interviews with departing employees.

3. Data on applicant flow by women and minorities is maintained for recruitments.

4. Records of placements, transfers, promotions and terminations are monitored to ensure non-discriminatory policy is carried out by the Department of Employee Services.

COMPLIANCE WITH SEX DISCRIMINATION GUIDELINES

Clackamas County complies with the OFCCP Sex Discrimination Guidelines. In support of these guidelines, the County undertakes the following activities:

RECRUITING AND ADVERTISING

1. Clackamas County recruits persons of both sexes for all positions, unless sex is a bona fide occupational qualification for a position.

2. No advertisement for a position specifies or implies a preference for either sex applicant unless sex is a bona fide occupational qualification for a position.

JOB POLICIES AND PRACTICES

1. None of the County's personnel policies or practices discriminates against or has the effect of discriminating against employees and/or applicants for employment because of sex.

2. No bargaining unit contract entered into with the County contains language, which violates these guidelines and policies.

3. All employees, without regard to sex, have an equal opportunity to apply for jobs posted.

4. The County's policies and practices make no distinction based on sex in employment opportunities, wages, hours, benefits, training, promotions, transfers, or any other condition of employment.

5. Marital status or whether a person has young children has no bearing on employment conditions.

6. Appropriate physical facilities are provided for members of both sexes.

7. The County does not penalize females in their conditions of employment because they require time away from work due to childbearing. The leave of absence policy treats women requiring time away from work because of childbearing the same as any other employee who requires time away from because of a temporary physical disability, in compliance with both Federal and State law.

8. No distinction by sex shall be made in any policy regarding retirement.

9. The County's policy regarding administration of parental leave complies with State law and is applicable to both males and females.

10. Men and women are provided equal access to all training programs.

SENIORITY SYSTEMS

1. No distinction is made because of sex in an employee's accumulation of length of service.

CLASSIFICATION AND COMPENSATION

1. Clackamas County makes no distinction based on sex in analyzing jobs and assigning salary ranges.

2. No job classification is restricted strictly to members of one sex.

AFFIRMATIVE ACTION

1. Clackamas County takes affirmative action to recruit females to apply for non-traditional positions in which they may be underutilized.

2. The County is committed to involving women in a variety of types of training programs, including those for positions where women are typically under represented.

3. The County provides equal access to any County-sponsored training.

SEX DISCRIMINATION AND COMPLAINT PROCEDURE

The County maintains the following procedure to resolve any complaints of discrimination based on sex:

Any employee or applicant for employment may file a written complaint alleging discrimination or an unlawful employment practice(s) with the Director of Employee Services. The Department of Employee Services will investigate the charge within thirty (30) days.

At the conclusion of the investigation, the Director of Employee Services shall make recommendations to correct any practice found to be in violation of this policy. Notice of the recommendation shall be forwarded to the appointing authority. All parties shall be notified of the status of the investigation. If the finding of the investigation is that there has been a violation of this policy, the Director of Employee Services will attempt to resolve the complaint. Under the law, individuals are protected from retaliation. Every effort will be made to preserve confidentiality consistent with conducting a thorough investigation.

Employees or applicants for employment shall be encouraged to seek the advice and counsel of the Director of Employees Services or Affirmative Action Officer when they suspect or feel they have been treated in a discriminatory fashion, or in a fashion contrary to this Affirmative Action Plan.

HARASSMENT POLICY

The County maintains a harassment policy, including a complaint process in which an employee may request an investigation. The County's Harassment Policy Statement is included in the appendix of this plan (Appendix D). The County's policy is also contained in the County Code addressing Personnel Administration.

COMPLIANCE WITH RELIGIOUS AND NATIONAL ORIGIN DISCRIMINATION GUIDELINES

Clackamas County complies with the OFCCP's Religious and National Origin Guidelines.

EQUAL EMPLOYMENT POLICY

1. It is the policy of the County to recruit, hire, train, promote, transfer, and make all other employment decisions without regard to religion or national origin.

2. The County takes Affirmative Action to ensure that applicants and employees are treated without regard to their religion or national origin throughout the employment process.

3. All employees and managers are notified of the County's policy to provide equal employment opportunity without regard to religion or national origin.

ACCOMMODATIONS

Clackamas County will make reasonable accommodation to the religious observance and practices of an employee or prospective employee. For an employee or prospective employee who observes certain religious holidays and Sabbaths during the year and who is conscientiously opposed to performing work or engaging in similar activity on such days, the County will make accommodations when such accommodations can be made without undue hardship on the conduct of the County's business. In determining the extent of the obligation, at least the following factors shall be considered:

1. Business necessity;

2. Financial costs and expenses; and

3. Resolve personnel problems.

SECTION II.

AFFIRMATIVE ACTION PLAN FOR INDIVIDUALS WITH DISABILITIES

POLICY STATEMENT

It continues to be the policy of Clackamas County, an equal opportunity employer, not to discriminate against any employee or applicant for employment because of any physical or mental disability, in regard to any position for which the employee or applicant is qualified, and to adhere to the County's obligation to take affirmative action to employ and advance in employment, qualified individuals with disabilities.

An "individual with a disability" is any person who (1) has a physical or mental impairment which substantially limits one of more major life activities, (2) has a record of such impairment, or (3) is regarded as having such an impairment. The legal obligation to take affirmative action to employ and advance qualified individuals with disabilities will be honored and discharged through implementation of the Affirmative Action Program as required by the Rehabilitation Act of 1973 as amended and the Americans with Disabilities Act Amendments Act of 2008.

This plan is based on the concept that individuals with a disability are entitled to receive fair and full consideration on the basis of job-related skills, knowledge and abilities. Such action applies to employment practices including, but not limited to, the following: employment, promotion, demotion, transfer, recruitment, recruitment advertising, layoffs, termination, rates of pay, other forms of compensation, and selection of training. The County hires and advances individuals with disabilities on the basis of their skills and abilities as compared to the requirements of the position. This assures the job relatedness of employment decisions. This plan does not set quotas or require the hiring of an individual with a disability simply because they are disabled.

Developing job opportunities for individuals with disabilities entails recognizing and working to break down artificial barriers that impede employment and advancement of individuals with disabilities. These barriers can be architectural and environmental in nature. Barriers can also be attitudinal, resulting from lack of knowledge, misconceptions and over-generalized thinking. Other obstacles are built into organizations because of unnecessarily rigid policies and procedures.

The following equal opportunity activities for individuals with disabilities are set forth. The County will continue to:

1. Consider applicants and employees on the basis of their abilities and job related physical and mental standards.
2. Make reasonable accommodation to physical or mental limitations of employees and applicants with disabilities when necessary.
3. Individually evaluate each applicant and employee with a disability.
4. Utilize appropriate public and private resources and rehabilitation services where feasible.
5. Provide access to recruitment and selection procedures for applicants and employees with disabilities.
6. Engage in outreach activities in a positive manner so as to encourage applicants and employees who believe themselves covered by Disability law and who wish to benefit under the County's Equal Opportunity Program to identify themselves.

AFFIRMATIVE ACTION CLAUSE

Clackamas County has included and will continue to include an equal opportunity clause for the disabled in each of its covered government contracts or subcontracts and modifications, renewals, or extensions thereof if not included in the original contract. In addition to the above, the County's contracting procedures will be modified so as to conform to any new or revised federal regulations.

APPLICABILITY OF PROGRAM REQUIREMENTS

At Clackamas County all Affirmative Action Plans are reviewed and updated. Plans are available for inspection by any employee or applicant by contacting the County's Affirmative Action Officer between the hours of 7:00 am and 6:00 p.m., Monday through Thursday. The Affirmative Action Plan is also available on the County internet by clicking on the Jobs link and then clicking on the Affirmative Action Plan (AAP) (PDF) link or on the intranet under My Departments – Employee Services – Personnel Links –Affirmative Action Plan.

All employees and applicants for employment are invited to identify themselves under the terms and provisions of this plan. Job applicants are encouraged to exercise their rights under this plan through a statement on the Affirmative Action on-line portion of the application. Any current employee may make it known to the Affirmative Action Officer their desire to benefit under this program. All information will be utilized only in accordance with this Plan. No employee or applicant for employment shall be subject to adverse treatment as a result of disclosure of information under this plan. All information shall be voluntarily provided and will be kept confidential. Information will only be provided on a need to know basis to: (1) managers and supervisors regarding necessary restrictions on the work or duties and needed accommodations of individuals with disabilities; (2) first aid and safety personnel may be informed when and to the extent appropriate, if the condition might require emergency treatment; and (3) government officials investigating compliance with governing regulations.

It must be recognized, however, that those who potentially stand to benefit from the provisions of this program may be reluctant to self-identify. The success or failure of this program will rest in large part on the County's ability to encourage participation in the program. The Department of Employee Services will explain the commitment of the County and the provisions of the Vocational Rehabilitation Act and ADA to interested job applicants and employees.

Those who will be considered individuals with a disability under the County's Affirmative Action Plan complies with the definition found in the Rehabilitation Act of 1973 and the ADA Amendments Act of 2008 and are as follows.

1. <u>One who has a physical or mental impairment that substantially limits one or more major life activities.</u> While life activities may include communication, education, mobility, transportation, self-care, working, etc., primary attention is given to those life activities that affect employability. An individual with a disability who is likely to experience difficulty in securing, retaining or advancing in employment is substantially limited.
2. <u>One who has a record of such impairment.</u> Although an individual may be completely recovered from a previous physical or mental disability, the attitudes of others toward that previous impairment may result in that person having difficulty in securing, retaining or advancing in employment. A person who has been in a mental hospital and has been rehabilitated or a person with a history of heart condition or cancer may often experience such difficulty.
3. <u>One who is regarded as having such an impairment.</u> A person who people <u>think</u> is disabled; for example, a person who might seem mentally disabled but is not, would be regarded as having such an impairment. This is particularly true if those having such perceptions are in a position to have an effect on the individual's chance to secure, retain or advance in employment

PROPER CONSIDERATION OF QUALIFICATIONS

Clackamas County has reviewed and will continue to review its personnel policies and procedures to ensure careful, thorough and systematic consideration of the job qualifications of known applicants and employees with disabilities for all job vacancies and training opportunities offered or available.

RECRUITMENT AND SELECTION PROCEDURES

While it is sometimes necessary to modify selection and placement procedures to facilitate employment of individuals with disabilities, the basic tenet of matching abilities to job requirements remains constant. Clackamas

County's selection procedures will continue to be reviewed by the Department of Employee Services to ensure non discrimination by:

1. Maintaining job requirements that are job related and accurately reflects job functions.
2. Ensuring that all physical and mental job requirements, which screen out otherwise qualified individuals with disabilities, are evaluated to ensure they are job related and necessary or the safe performance of the job.
3. Maintaining internal communication to ensure all employees and applicants for employment are aware of their rights under this plan.
4. Giving proper consideration of all individuals with disabilities who have disclosed their rights under this plan, including those currently employed at the County and those whom apply for County jobs.
5. Maintaining and making available to all applicants and employees a complaint procedure if they feel they have been discriminated against based on their disability.
6. Utilizing an application which requires only information which is applicable to employment and allows an individual with a disability to relate any unique skills she or he may possess.
7. Ensuring that all testing is valid and job related and does not screen out individuals with disabilities. Examples of action which may be taken include:
   A. Careful consideration of the use of balance, multi-part testing and selection procedures; and
   B. Employment tests administered to an applicant or employee who has a disability that impairs sensory, manual or speaking skills will be modified, as necessary, to best reflect the applicant's or employee's job skills and aptitude. Accommodation is made to ensure accessibility to examination facilities and modification of test administration as necessary.
8. Reviewing reasons why job applicants with disabilities were not selected for job openings to ensure that such reasons are job related.
9. Ensuring that all supervisors, managers and the Department of Employee Services staff involved in the selection process are informed of this policy.

POST PLACEMENT SERVICES

The responsibility of the County does not terminate with the recruitment, selection and placement of employees with disabilities in our organization. Post-placement services, necessary for all employees, take on added significance for employees with disabilities. These services will help to assure program success by fostering the best possible psychological and physical environment for job performance and the acquisition of further skills essential for career advancement. To ensure equal opportunity for the disabled is effective, the following post-placement initiatives, at a minimum, will be undertaken:

1. Follow-Up of Placements

Systematic and timely follow-up of placements can identify the need for further job training, equipment modification, or other work adjustments. If follow-up efforts identify problems, steps to arrive at viable solutions will be taken to make a timely provision of appropriate supportive services.

2. Training Opportunities

Training opportunities to improve skills, increase effectiveness of job performance, and develop potential for career advancement should be available to all who wish to take advantage of such training opportunities. As positions become available, all employees with disabilities who meet the minimum requirements shall be given equal

consideration for promotion and transfer. Information regarding opportunities for promotion and training will be made available to employees through new employee orientation and internal publications.

OTHER PROCEDURAL AUDITS

The County will undertake the following activities to ensure job relatedness of employment requirements:

1. Classification specifications and analysis methods will continue to be examined to assure that analysis methods are being consistently applied and that classification specifications reflect actual job duties and responsibilities.

2. Experience, training and/or education listed on classification specifications reviewed periodically to ensure they are in fact job related and do not tend to eliminate qualified individuals with disabilities.

3. The County's internal promotion policy is reviewed periodically to ensure that the policy provides equal opportunity for all employees.

4. County personnel practices are periodically reviewed to assure that the requirements for positions do not discriminate against individuals with disabilities in hiring and promotion considerations.

PHYSICAL AND MENTAL QUALIFICATIONS

By providing and adhering to a schedule or review as outlined in the previous chapter, Clackamas County has ensured and will continue to ensure that physical and mental job qualification requirements utilized in the selection of applicants and employees are job related, and consistent with business necessity and the safe performance of the job. All inquiries and examinations conducted regarding the physical or mental condition of an employee or applicant are kept confidential in accordance with federal regulations.

Specifically, the County will undertake the following activities to ensure job relatedness of employment decisions:

1. Classification specifications are periodically reviewed to ensure that classification specifications reflect actual job duties and responsibilities.

2. Experience, education, and/or training listed for classifications are periodically reviewed to ensure they are in fact necessary for the proper performance of the duties of the position.

3. Physical requirements for a position are periodically reviewed to ensure they are job related and do not tend to eliminate qualified individuals with disabilities.

4. When the County utilizes medical examinations in the employment process, the following conditions apply:

   A. All entering employees in the same job classification are subjected to an examination regardless of disability status;

   B. The medical standards have been determined to be job related through a thorough job analysis;

   C. The results of such an examination are to be used only in accordance with the requirements of the Rehabilitation Act and the ADA Amendments Act of 2008.

   D. Results of such examinations will be maintained on a “need to know” basis. Supervisors and managers are informed regarding restrictions of duties or necessary accommodations. First aid and safety personnel are informed about conditions that might require emergency treatment. Government officials investigating compliance with regulations may be informed.

ACCOMMODATIONS

Clackamas County has made and will continue to make reasonable accommodations to the physical and mental limitations of employees and applicants where such accommodations do not constitute an undue hardship on the conduct of its business or incur excessive financial cost.

These accommodations will be considered on a case-by-case basis. The County will use available public and private resource organizations for advice and technical assistance in this area. Programs and activities sponsored by the County are made accessible to individuals with disabilities.

The County is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with Section 504 of the Vocational Rehabilitation Act of 1973 and the ADA Amendments Act of 2008. The County is responsible for auditing each County facility with regards to public accessibility issues. In designing new construction and remodeling old facilities, the County may need to remove architectural barriers for individuals with disabilities.

STRUCTURAL ACCOMMODATIONS

On an ongoing basis, facilities, equipment and machines will be inspected to identify areas where modifications might be made to accommodate employees with disabilities. Such accommodations may include, but are not limited to the following:

1. Rearranging files or shelves for accessibility to wheelchair occupants;
2. Widening access areas between fixtures to allow room for wheelchairs;
3. Placing Braille labels on shelves so that blind employees can identify contents;
4. Raising or lowering equipment to provide comfortable working heights;
5. Moving equipment controls to one side or another or modifying them for hand or foot operation;
6. Installing special holding devices on desks, machines or benches;
7. Installing TDD telephones; and
8. Providing an extension or gooseneck to hold the phone receiver.

NON-STRUCTURAL ACCOMMODATIONS

Other non-structural accommodations will be made as needed. Such accommodations may include, but are not limited to the following:

1. Job restructuring;
2. Flexible working schedules and job sharing; and
3. Employee assistance programming, including referral to other community resources, job counseling, etc., for present employees of the County who are having problems on the job and/or who have recently become disabled.

OTHER ACCOMMODATIONS

Other efforts taken to ensure accessibility and accommodation are as follows:

1. Efforts are exercised to prevent potentially hazardous situations.
2. The County's Department of Employee Services shall be accessible to disabled individuals to provide opportunities for applicants and employees.
3. Lunch room and break facilities shall be modified and made accessible to all employees.
4. Labor unions will be notified of the County's continuing commitment to equal employment and affirmative action. Bargaining agreements are reviewed at the contract renewal time with the union to identify potentially discriminating practices.
5. Orientation and training programs for new employees are tailored as required to meet the needs of individuals with disabilities.
6. When meetings are held outside the County, the facilities shall be checked for accommodations accessible to employees with disabilities as necessary.
7. Courses will be offered in places accessible to individuals with disabilities and free of architectural and transportation barriers.
8. If a course is to be given at a location away from the work site, employees with disabilities will be assisted in making necessary travel arrangements.
9. Other arrangements to ensure accessibility to training will be taken, such as providing interpreters or sending printed materials for the deaf.

COMPENSATION

When determining compensation for any employee with a disability covered under this plan, the County shall not take into consideration or reduce the compensation offered by the County due to any disability income, pension, or other benefit the applicant or employee receives from another source. All employees shall continue to be paid in accordance with their responsibilities and performance.

OUTREACH, POSITIVE RECRUITMENT AND EXTERNAL DISSEMINATION OF POLICY

Clackamas County has previously reviewed and will continue to review its employment practices in order to ensure that they provide the required affirmative action in the employment and advancement of qualified disabled individuals. The County has further undertaken and will continue to undertake appropriate outreach and positive recruitment activities that may include, but are not necessarily limited to the following:

1. The County will continue to communicate externally its obligation to engage in affirmative action to employ qualified individuals with disabilities.
2. The County will continue with internal review procedures to ensure that its obligation to engage in affirmative action, to employ and promote qualified individuals with disabilities, are being fully implemented.
3. The County has periodically informed and will continue to inform all employees and prospective employees of its commitment to nondiscrimination and its effort to increase employment opportunities through affirmative action for qualified individuals with disabilities.
4. Engage in reasonable outreach efforts to make agencies in the position of referring individuals with disabilities aware of the County's commitment to affirmative action as outlined under this plan. As openings occur, the

County will continue to send job announcements to appropriate social service agencies, which specialize in training, referral, and placement of qualified individuals with disabilities.

5. The County will continue to disseminate its affirmative action obligations toward individuals with disabilities in recruitment advertising.
6. The County will include workers with disabilities when employees are pictured in recruitment advertising.
7. The County will list job openings with the Oregon Employment Department.
8. The County will continue to notify all subcontractors, vendors and suppliers of the County's policy and will request appropriate action on their part.

INTERNAL DISSEMINATION OF POLICY

In order to assure greater employee participation in the County's affirmative action effort, Clackamas County will continue to internally adopt, implement, and disseminate the policy contained in the Affirmative Action Programs as follows:

1. Include the equal employment opportunity policy in the County's employment policies and practices.
2. Publicize the equal employment opportunity policy in internal publications such as the Personnel Ordinance.
3. As needed, conduct special meetings with managers to explain the extent of the County's and individual employee's responsibility for implementation of the equal employment opportunity policy and affirmative action plan.
4. Where applicable, schedule special meetings with employees to discuss the equal employment opportunity policy and affirmative action plan and explain individual employee responsibilities.
5. Discuss the equal employment opportunity policy and affirmative action plan in employee orientation and supervisory training workshops.
6. Include articles on accomplishments of workers with disabilities in County publications as appropriate.
7. Post the EEO policy on County bulletin boards, including a statement that employees and applicants are protected from coercion or intimidation for filing a complaint or assisting in the investigation under the Act. (See Appendix C for a copy of this statement.)
8. Meet with union officials to inform them of the County's policy and request their cooperation.
9. Include nondiscrimination clauses in all union contracts and review all bargaining agreement provisions to ensure they are nondiscriminatory.

RESPONSIBILITY FOR IMPLEMENTATION

The Affirmative Action Officer for Clackamas County is responsible for implementation of the Affirmative Action Program for all individuals. The Affirmative Action Officer's responsibilities shall continue to include, but not be limited to the following:

1. Maintain internal procedures to ensure full compliance with this plan.
2. Audit the County's effectiveness in meeting the goals and responsibilities set forth in this plan and undertake appropriate activities to remedy deficiencies.
3. Keep managers advised of any developments in the area of affirmative action.
4. Assist and counsel managers and supervisors regarding affirmative action responsibilities.
5. Serve as liaison between the County and agencies of and for individuals with disabilities.
6. Ensure that supervisors are advised that the County is obligated to prevent harassment of individuals placed through affirmative action efforts.
7. Develop policies as needed to deal with specific issues of equal employment opportunity for individuals with disabilities.
8. On an ongoing basis the Department of Employee Services will review the County's policies and practices to ensure compliance with the requirements set forth in the Rehabilitation Act of 1973 as amended and the Americans with Disabilities Act Amendments Act of 2008.

DEVELOPMENT AND EXECUTION OF AFFIRMATIVE ACTION PROGRAMS

In order to effectively execute the County's Affirmative Action Program the following steps shall continue to be taken:

1. Job requirements are outlined in classification specifications and maintained by the Department of Employee Services. Classification specifications shall be made available to all staff who are involved in the recruitment, screening, selection and promotion processes.

2. The County will periodically evaluate its total selection process, including training and promotion, to ensure that qualified disabled individuals are not stereotyped or treated in a manner which limits their access to jobs for which they are qualified.

3. All personnel involved in recruitment, screening, selection, promotion, disciplinary and related processes are trained regarding the County's affirmative action responsibilities.

4. County Department of Employee Services staff shall be available to meet with representatives of recruitment sources in order to provide briefing sessions on County policies and provide tours of the County facilities.

5. Recruitment efforts shall incorporate outreach to qualified individuals with disabilities.

SECTION III.

AFFIRMATIVE ACTION PLAN FOR DISABLED VETERANS, RECENTLY SEPARATED VETERANS, OTHER PROTECTED VETERANS, AND ARMED FORCES SERVICE MEDAL VETERANS

POLICY STATEMENT

It continues to be the policy of Clackamas County, an equal opportunity employer, not to discriminate against any employee or applicant for employment because of such individual's status as a qualified disabled veteran, recently separated veteran, other protected veteran, or Armed Forces service medal veteran. It is also the policy of Clackamas County to take affirmative action to employ and advance in employment all persons regardless of their status as qualified individuals with disabilities or qualified protected veterans and to base all employment decision only on valid job requirements. This policy applies to all employment actions, including, but not limited to recruitment, hiring, training, promotion, transfer, layoff, recall, termination or other employment actions.

Employees and applicants to Clackamas County shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged or may engage in filing a complaint, assisting or participating in an investigation, or opposing any act or practice made unlawful by the Veterans' Readjustment Assistance Act of 1974 (VEVRAA) or any other Federal, state or local law regarding EEO for qualified veterans.

Developing job opportunities for individuals who are disabled veterans and Vietnam era veterans with disabilities entails recognizing and working to break down barriers which impede employment and advancement of these individuals. These barriers can be architectural or environmental in nature. Barriers can also be attitudinal, resulting from lack of knowledge, misconceptions and over-generalized thinking. Other obstacles are built into organizations because of unnecessarily rigid policies and procedures.

The following equal opportunity activities for disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans are set forth. The County will continue to:

1. Consider applicants and employees on the basis of their abilities and job related physical and mental standards.
2. Make reasonable accommodation to physical or mental limitations of employees and applicants with disabilities when necessary.
3. Individually evaluate each applicant and employee with a disability.
4. Utilize appropriate public and private resources and rehabilitation services where feasible.
5. Provide access to recruitment and selection procedures for applicants and employees with disabilities.
6. Engage in outreach activities in a manner so as to encourage applicants and employees who believe themselves covered by the Vietnam Era Veteran's Readjustment Assistance Act of 1974 and who wish to benefit under the County's Equal Opportunity Program, to self identify.

AFFIRMATIVE ACTION CLAUSE

Clackamas County has included and will continue to include an equal opportunity in each of its covered government contracts or subcontracts and modifications, renewals, or extensions thereof if not included in the original contract. In addition to the above, the County's contracting procedures will be modified so as to conform to any new or revised federal regulations.

APPLICABILITY OF PROGRAM REQUIREMENTS

All employees and applicants for employment are invited to identify themselves under the terms and provisions of this plan. Any current employee may make it known to the Affirmative Action Officer at any time, their desire to benefit under this program. All information will be utilized only in accordance with this Plan. No employee or applicant for employment shall be subject to adverse treatment as a result of disclosure of information under this

plan. All information shall be voluntarily provided and will be kept confidential. Information will only be provided on a need to know basis to: (1) managers and supervisors regarding necessary restrictions on the work or duties and needed accommodations of individuals with disabilities; (2) first aid and safety personnel may be informed when and to the extent appropriate, if the condition might require emergency treatment; and (3) government officials investigating compliance with governing regulations.

It must be recognized, however, that those who potentially stand to benefit from the provisions of this program may be reluctant to self-identity. The success or failure of this program will rest in large part on the County's ability to encourage participation in the program and the manner in which a person is handled after self-identification. The Affirmative Action Officer or the Department of Employee Services will explain the commitment of the County and the provisions of the Vietnam Era Veterans Readjustment Assistance Act of 1974 to interested job applicants and employees.

REVIEW OF PERSONNEL PROCESSES

Clackamas County has reviewed and will continue to review its personnel policies and procedures to ensure careful, thorough and systematic consideration of the job qualifications of applicants and employees who are known disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans for all job vacancies and training opportunities offered or available.

In determining the qualifications of veterans, Clackamas County relies only on the portion of the individual's military record, including discharge papers that are relevant to the requirements of the opportunity in issue.

While it is sometimes necessary to modify selection and placement procedures to facilitate employment of individuals with disabilities, the basic tenet of matching abilities to job requirements remains constant. Clackamas County's selection procedures will continue to be reviewed to ensure they screen in applicants who are disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans by:

1. Maintaining job requirements that are job related and accurately reflect job functions.

2. Ensuring that all physical and mental job requirements which screen out otherwise qualified individuals with disabilities are evaluated to ensure they are job related and necessary to the safe performance of the job.

3. Maintaining internal communication to ensure all employees and applicants for employment are aware of their rights under this plan.

4. Giving proper consideration of all veterans and veterans with disabilities who have disclosed their rights under this plan, including those currently employed at the County and those whom apply for County jobs.

5. Maintaining and making available to all applicants and employees a complaint procedure if they feel they have been discriminated against based on their status as a disabled veteran, recently separated veteran, other protected veteran, or Armed Forces service medal veteran.

6. Utilizing an application which requires only information which is applicable to employment and allows a disabled veteran, recently separated veteran, other protected veteran, or Armed Forces service medal veteran to relate any unique skills she or he may possess.

7. Ensuring that all testing is valid and job related and does not screen out qualified individuals. Examples of action which may be taken include:

A. Careful consideration of the use of balance, multi-part testing and selection procedures; and

B. Employment tests administered to an applicant or employee who has a disability that impairs sensory, manual and speaking skills will be modified, as necessary, to best reflect the applicant's or employee's job skills and aptitude. Accommodation is made to ensure accessibility to examination facilities and modification of test administration as necessary.

8. Reviewing reasons for which job applicants exercising their rights under this plan were not selected for job openings to ensure that such reasons are job related.

9. Ensuring that all supervisors, managers and the Department of Employee Services staff involved in the selection process are informed of this policy.

The responsibility of the County does not terminate with the recruitment, selection and placement of employees who are qualified veterans under this plan. Post-placement services, necessary for all employees, take on added significance for these employees. These services will help to assure program success by fostering the best possible psychological and physical environment for job performance and the acquisition of further skills essential for career advancement. To ensure that the County's commitment to equal employment opportunity is effective, the following post-placement programs, at a minimum, will be undertaken:

1. Follow-Up of Placements

   Systematic and timely follow-up of placements can identify the need for further job training, equipment modification, or other work adjustments. If follow-up efforts identify problems, steps to arrive at viable solutions will be taken to make a timely provision of appropriate supportive services.

2. Training Opportunities

   Training opportunities to improve skills, increase effectiveness of job performance, and develop potential for career advancement should be available to all who wish to take advantage of them. As positions become available, all employees with disabilities who meet the minimum requirements shall be given equal consideration for promotion and transfer. Information regarding opportunities for promotion and training will be made available to employees through new employee orientation and internal publications.

The County will undertake the following activities to ensure job relatedness of employment requirements:

1. Classification specifications and analysis methods will continue to be examined to assure that analysis methods are being consistently applied and that classification specifications reflect actual job duties and responsibilities.

2. Experience, training and/or education listed on classification specifications are reviewed periodically to ensure they are in fact job related and do not tend to eliminate qualified individuals.

3. The County's internal promotion policy is reviewed periodically to ensure that the policy provides equal opportunity for all employees.

4. County personnel practices are periodically reviewed to assure that the requirements for positions do not discriminate against individuals with disabilities in hiring and promotion considerations.

PHYSICAL AND MENTAL JOB QUALIFICATION STANDARDS

The physical and mental job qualification requirements listed on class specifications are periodically reviewed to ensure that, to the extent qualification standards tend to screen out qualified disabled veterans, they are job-related for the classification, and consistent with business necessity and the safe performance of the job. Whenever such standards are used in the selection of applicants or employees for employment or other change in employment status (such as a recruitment process), the standards shall be reviewed to the specific job or jobs and consistency with business necessity. All inquiries and examination conducted regarding the physical or mental condition of an employee or applicant are kept confidential in accordance with federal regulations.

Specifically, the County will undertake the following activities to ensure job relatedness of employment decisions:

1. Classification specifications are periodically reviewed to ensure that they reflect actual job duties and responsibilities.

2. Experience, education, and/or training listed for classifications are periodically reviewed to ensure they are in fact necessary for the proper performance of the duties of the position.

3. Physical requirements for a position are periodically reviewed to ensure they are job related and do not tend to eliminate qualified individual veterans.

4. When the County utilizes medical examinations in the employment process, the following conditions apply:

   A. All entering employees in the same job classification are subjected to an examination regardless of veteran or disability status;

   B. The medical standards have been determined to be job related through a thorough job analysis;

   C. The results of such an examination are to be used only in accordance with the requirements of the Rehabilitation Act, Vietnam Era Veterans Readjustment Assistance Act of 1974 and the ADA Amendments Act of 2008.

   D. Results of such examinations will be maintained on a “need to know” basis. Supervisors and managers are informed regarding restrictions of duties or necessary accommodations. First aid and safety personnel are informed about conditions that might require emergency treatment. Government officials investigating compliance with regulations may be informed.

REASONABLE ACCOMMODATIONS

Clackamas County has made and will continue to make reasonable accommodations to the known physical and mental limitations of qualified individuals with disabilities and qualified disabled veterans, unless such accommodations constitute an undue hardship on the conduct of its business or incur excessive financial cost.

These accommodations will be considered on a case-by-case basis. The County will use available public and private resource organizations for advice and technical assistance in this area.

As a matter of affirmative action, if an employee who is known to be a disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the County will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee’s disability. If the employee states an affirmative response, then reasonable accommodation will be considered.

COMPENSATION

When determining compensation for any employee who is a veteran covered under this plan, the County shall not take into consideration or reduce the compensation offered by the County due to any disability income, pension, or other benefit the applicant or employee receives from another source. All employees shall continue to be paid in accordance with their responsibilities and performance.

HARASSMENT PREVENTION

Employees and applicants of Clackamas County will not be subject to harassment, intimidation, threats, coercion or discrimination because they engage, or may engage in filing a complaint, assisting in a review or investigation or otherwise seek to obtain their legal rights related to any federal, state, or local law regarding EEO) for qualified disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans.

OUTREACH, POSITIVE RECRUITMENT AND EXTERNAL DISSEMINATION OF POLICY

Clackamas County has previously reviewed and will continue to review its employment practices in order to ensure that they provide the required affirmative action in the employment and advancement of qualified disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans. The County has further undertaken and will continue to undertake appropriate outreach and positive recruitment activities, which may include, but are not necessarily limited to the following:

1. The County will continue to communicate externally its obligation to engage in affirmative action to employ qualified disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans.
2. The County shall enlist the assistance and support of the following agencies in recruiting and developing training opportunities: a) Local Veterans' Employment Representatives at the State offices of WorkSource Oregon (Employment Department); b) Veterans' Services Office staff in the County's Business and Community Services Division who routinely send recruitment announcements to agencies and individuals representing veterans and veterans' groups.
3. Participation in outreach events, community gatherings, job fairs and similar events for veterans.
4. Creation of targeted Veterans' outreach events sponsored by Clackamas County.
5. As openings occur, the County will continue to send job announcements to appropriate social service agencies, which specialize in training, referral, and placement of qualified disabled veterans.
6. The County will continue to disseminate its affirmative action obligations in recruitment advertising. (See Appendix B for a copy of the Affirmative Action resource list.)
7. The County will continue to notify all subcontractors, vendors and suppliers of the County's policy and will request appropriate action on their part.
8. The County will continue with internal review procedures to ensure that its obligation to engage in affirmative action to employ and promote qualified disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans, are being fully implemented.

INTERNAL DISSEMINATION OF POLICY

All Affirmative Action Plans are reviewed and updated annually. Plans are available for inspection by any employee or applicant by contracting the County's Affirmative Action Officer between the hours of 7:00AM and 6:00PM, Monday

through Thursday. The Affirmative Action Plan is also available on the County internet by clicking on the Jobs link and then on the Affirmative Action Plan (AAP) (PDF) link or on the intranet under My Departments – Employee Services – Personnel Links – Affirmative Action Plan.

Clackamas County will continue to internally adopt, implement, and disseminate the policy contained in the Affirmative Action Programs as follows:

1. Include the equal employment opportunity policy in County Personnel Ordinances.
2. Publicize the equal employment opportunity policy in internal publications such as the Personnel Ordinances.
3. As needed, conduct special meetings with managers to explain the extent of the County's and individual employee's responsibility for implementation of the equal employment opportunity policy and affirmative action plan.
4. Where applicable, schedule special meetings with employees to discuss the equal employment opportunity policy and affirmative action plan and explain individual employee responsibilities.
5. Discuss the equal employment opportunity policy and affirmative action plan in employee orientation and supervisory training workshops.
6. Include articles on accomplishments of workers who are disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans in County publications as appropriate.
7. Post the policy on County bulletin boards, including a statement that employees and applicants are protected from coercion or intimidation for filing a complaint or assisting in an investigation under the Law. (See Appendix C for a copy of this statement.)
8. Meet with union officials to inform them of the County's policy and request their cooperation.
9. Include nondiscrimination clauses in all union contracts and review all bargaining agreement provisions to ensure they are nondiscriminatory.

RESPONSIBILITY FOR IMPLEMENTATION

The Director of Employee Services for Clackamas County is responsible for implementation of the Affirmative Action Program for disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans . The Director's responsibilities shall continue to include, but not be limited to the following:

1. Develop and maintain policy statements and Affirmative Action Programs in compliance with Executive Order 11246, as amended.
2. Maintain internal procedures to ensure full compliance with this plan.
3. Audit the County's effectiveness in meeting the goals and responsibilities set forth in this plan and undertake appropriate activities to remedy deficiencies.
4. Keep managers advised on any developments in the area of affirmative action.
5. Assist and counsel managers and supervisors regarding affirmative action responsibilities.
6. Serve as liaison between the County and agencies of and for disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans.
7. Ensure that supervisors are advised that the County is obligated to prevent harassment of individuals placed through affirmative action efforts.

8. Develop policies as needed to deal with specific issues of equal employment opportunity for disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans.
9. On an ongoing basis the Department of Employee Services will review the County's policies and practices to ensure compliance with the requirements set forth in the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Rehabilitation Act of 1973, as amended, the ADA Amendments Act of 2008, and other state law.

DEVELOPMENT AND EXECUTION OF AFFIRMATIVE ACTION PROGRAMS

In order to effectively execute the County's Affirmative Action Program the following steps shall continue to be taken:

1. Job qualification requirements are outlined in classification specifications and maintained by the Department of Employee Services. Classification specifications shall be made available to all staff who are involved in the recruitment, screening, selection and promotion processes.
2. The County will periodically evaluate its total selection process, including training and promotion, to ensure that qualified disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans are not stereotyped or treated in a manner which limits their access to jobs for which they are qualified.
3. All personnel involved in recruitment, screening, selection, promotion, disciplinary and related processes are trained regarding the County's affirmative action responsibilities.
4. County Employee Services staff shall be available to meet with representatives of recruitment sources in order to provide briefing sessions on County policies and provide tours of the County facilities.
5. Recruitment efforts shall incorporate outreach to qualified disabled veterans, recently separated veterans, other protected veterans, or Armed Forces service medal veterans.

SECTION IV.

APPENDICES

APPENDIX A

DESCRIPTION OF EEO JOB CATEGORIES

EEO 1 **Officials and Administrators:** Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Includes: department directors, bureau chiefs, division chiefs, directors, deputy directors, controllers, examiners, wardens, superintendents, sheriffs, police and fire chiefs, and kindred workers.

EEO 2 **Professionals:** Occupations, which require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge. Includes: Personnel and labor relations workers, social workers, mental health therapists, doctors, psychologists, registered nurses, economists, dietitians, lawyers, system analysts, accountants, engineers, employment and vocational rehabilitation counselors, teachers or instructors, and kindred workers.

EEO 3 **Technicians:** Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training. Includes: computer programmers and operators, drafters, surveyors, licensed practical nurses, photographers, radio operators, technical illustrators, highway technicians, technicians (medical, dental, electronic, physical sciences, engineering), assessors, inspectors, and kindred workers.

EEO 4 **Protective Service Workers:** Occupations in which workers are entrusted with public safety, security and protection from destructive forces. Includes: police patrol officers, fire fighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, probation and parole officers, harbor patrol officers, and kindred workers.

EEO 5 **Paraprofessionals:** Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for a professional or technical status. Such positions may fall within an identified pattern of staff development and promotion under a "New Careers" concept. Includes: library assistants, research assistants, medical aides, child support workers, policy auxiliary, welfare service aides, recreation assistants, homemaker aides, home health aides, and kindred workers.

EEO 6 **Office and Clerical Workers:** Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office. Includes: bookkeepers, messengers, office machine operators, clerk-typists, stenographers, court transcribers, hearing reporters, statistical clerks, dispatchers, license distributors, payroll clerks, and kindred workers.

EEO 7 **Skilled Craft Workers:** Occupations in which workers perform jobs which require special manual skill and a thorough comprehensive knowledge of the processes involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Includes: mechanics and repairers, electricians, heavy equipment operators, stationary engineers, skilled machining operators, carpenters, compositors and typesetters, and kindred workers.

EEO 8 **Service Maintenance Workers:** Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds or public property. Workers in this group may operate machinery. Includes: cooks, chauffeurs, laundry and dry cleaning operators, truck drivers, bus drivers, garage laborers, custodial employees, gardeners and groundskeepers, refuse collectors, construction laborers.

APPENDIX B

AFFIRMATIVE ACTION RESOURCE LIST

Agency	**Email**
"Q" Estanislado Quinones - Veterans Rep, DVOP	Estanislado.Quinones@state.or.us
Air National Guard, Wing Family Program Coordinator	Mary.bell@ang.af.mil
Bluecc - Connie Fellows	cfellows@bluecc.edu
Capital Career Center	Capjobs@pcc.edu
Career Makers	peter@careermakers.com
Clackamas Community College	careercenter@clackamas.edu
Central City Concern - Cindy Bennett	cindy.bennett@ccconcern.org
Chemeketa Community College	Humanresources@chemeketa.edu
City of Glastone	bannick@ci.gladstone.or.us
City of Portland	hronline@portlandoregon.gov
Community Works Project - Debora Higa, BSC	deborahhi@communityworksnw.org
Concordia University - Careers	careerservices@cu-portland.edu
David Conroy MS, RCD	daconroy@bmi.net
DePaul Industries - Carol Simon-Perry, M.S.	csimon-perry@tc.depaulindustries.com
DHS / Vocational Rehabilitation	connie.s.foster@state.or.us
Douglas County	GLCookus@co.douglas.or.us
Exceed Enterprises	lynnw@exceedpdx.com
George Fox College	Careers@georgefox.edu
IME Oregon	ime.oregon@gmail.com
Impact Business Consultants	Impact1@teleport.com
International Refugee Ctr of Oregon	debi_irco@yahoo.com
Jennifer Hibbs - Reintegration Specialist - Oregon National Guard	jennifer.hibbs@ang.af.mil
Lane Community College	CES@lanecc.edu
Lane County Personnel Services	jobs@co.lane.or.us
Marylhurst University	jobboard@marylhurst.edu

Mt Hood CC	mhcareer@mhcc.edu
NE Veterans Association	rsa4753@yahoo.com
New Horizons of Portland	dianem@nhoregon.com
Northeast One Stop	elincoln@pcc.edu
Oregon Advocacy Commission Office	OACO.mail@das.state.or.us
Oregon Army National Guard	Bryan.k.smith1@us.army.mil
Oregon City Employment Office	ellen.m.smith@state.or.us
Oregon City State Employment Office	Teri.L.Moore@state.or.us
Oregon Human Development	rhauge@ohdc.org
Oregon Metro	jobs@oregonmetro.gov
Oregon Tradeswomen - Mandy Kubisch	MANDY@tradeswomen.net
Oregon Tradewomen	april@tradeswomen.net
Oregon State Bar	mwagner@osbar.org
Pacific University	odriscob@pacific.edu
Portland Community College - SE Center	jeannette.jones@pcc.edu
Pioneer Pacific College	jgustafson@pioneerpacific.edu
Portland Community College	ssammler@pcc.edu
Portland Community College	Stujobs@pcc.edu
Portland State University	ASKCARC@pdx.edu
Reed College - Bonnie Ingersoll	ingerbon@reed.edu
Scott Wilkening - Reintegration Specialist H2H	scott.a.wilkening.ctr@mail.mil
SE Works	soliver@seworks.org
Southern Oregon University	fedorekb@sou.edu
Stacey Condray	stac4real@yahoo.com
Staff Sergeant US Army	Luciano.campagnolo@us.army.mil
State of Oregon DAS	fgarciair23@yahoo.com
Stonebridge Rehab Associates	stonebridger@aol.com
The Urban League of Portland Workforce Development	uljobs@ulpdx.org
Unite Cerebal Palsy	ucpa@ucpaorwa.org

University of Oregon	Jobs@darkwing.uoregon.edu
University of Portland	Career@up.edu
Urban League of Portland	uljobs@ulpdx.org
Veteran's Administration	Jaime.Cervantez@med.va.gov
Veterans Clackamas County	veterans@co.clackamas.or.us
Washington County Human Resource	HR@co.washington.or.us
Willamete University	cs-job-postings@willamette.edu
Wilsonville Personnel Department	parent@ci.wilsonville.or.us

APPENDIX C

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of Clackamas County to adhere to equal employment opportunity and affirmative action as a basic element of human resources management. Discrimination in a personnel action on a basis unrelated to the job is prohibited. Employment and promotion decisions in County service shall be made in accordance with the principles of equal employment opportunity. County policy prohibits discrimination on the basis of race, color, sex, sexual orientation, gender identity, religion, national origin, age, marital status, physical or mental disability, or other protected status as those terms are understood under Oregon and federal law.

The Board of County Commissioners has adopted an affirmative action plan and program which is set forth in a separate document and is available throughout County facilities. The Affirmative Action Plan/Program outlines how the County plans to overcome identified barriers and how it plans to integrate its workforce so that it is representative of its surrounding community. All employees are encouraged to familiarize themselves with the Board's affirmative action policies. The Affirmative Action Plan commits all employees of Clackamas County to support the Board of County Commissioners policy regarding equal employment opportunity.

Any employee or applicant for employment may file a written complaint alleging discrimination, unlawful employment practice(s), violation of equal employment opportunity, or harassment with the Director of Employee Services, who will investigate the charge within thirty (30) days. The Director of Employee Services may also initiate an investigation should such an alleged practice come to his/her attention.

At the conclusion of the investigation, the Director of Employee Services shall make recommendations to correct any practices found to be in violation of this policy. Notice of the recommendation shall be forwarded to the Department Director. All parties shall be notified of the status of the investigation. If the finding of the investigation is that there has been a violation of this policy, the Director of Employee Services will attempt to resolve the complaint. Under the law (ORS Chapter 659), individuals are protected from retaliation. Every effort will be made to preserve confidentiality consistent with conducting a thorough investigation.

CLACKAMAS COUNTY
BOARD OF COUNTY COMMISSIONERS

Adoption of this Affirmative Action Plan is effective January 1, 2016

APPENDIX D

HARASSMENT POLICY STATEMENT

It is the policy of Clackamas County to maintain a work environment which is free of harassment based on race, color, age, religion, sex, sexual orientation, gender identity, disability, national origin or any other protected status in accordance with applicable law. This policy includes harassment between supervisors and subordinates and between coworkers. Maintaining a harassment free work environment is the responsibility of all employees. All employees should take reasonable steps to prevent such harassment from occurring. Failure to adhere to this policy will result in disciplinary action up to and including termination.

HARASSMENT: Harassment is defined as verbal or physical conduct that is derogatory or shows hostility towards an employee because of race, color, age, religion, sex, sexual orientation, gender identity, disability, national origin or any other protected status in accordance with applicable law, and;

A. Has the purpose or effect of creating an intimidating, hostile or offensive work environment;

B. Has the purpose or effect of unreasonably interfering with an employee's work performance; or

C. Otherwise substantially and adversely affects an employee's employment opportunities.

SEXUAL HARASSMENT: Specifically, the Equal Employment Opportunity Commission's (EEOC) guidelines define sexual harassment to include unwelcome sexual advances, requests for sexual favors, and other offensive verbal or physical conduct of a sexual nature when:

A. Submission to such conduct is made a condition of employment; or
B. Submission to or rejection of such conduct is the basis of an employment decision (tangible job benefits, promotion, retention, performance evaluation, etc.); or
C. When the conduct unreasonably interferes with the affected person's work performance or creates an intimidating, hostile or offensive work environment.

Department managers and supervisors, male or female, shall not use their authority to solicit sexual favors when submission to or rejection of such conduct, by an individual, is used as the basis for employment decisions affecting that individual. Department managers and supervisors shall not allow conduct that creates an intimidating, hostile or offensive work environment. Included in forbidden conduct are lewd gestures, sexually offensive language and sexually offensive behavior.

Clackamas County and its managers are responsible for the acts of their agents and supervisory employees with respect to preventing sexual harassment in the work place. Department managers and supervisors shall develop methods to educate employees about this issue.

Prevention is the best approach in eliminating sexual harassment. All employees will take reasonable steps necessary to prevent such harassment from occurring. Maintaining a harassment free work environment is the responsibility of all employees.

RETALIATION: It is a violation of the law and County policy to harass someone based on their filing of a complaint. Retaliation is adverse treatment that is likely to deter employees from engaging in a protected activity such as participating in a harassment investigation.

INITIATING AN INVESTIGATION REGARDING HARASSMENT: Employees or applicants for employment, who experience behavior in violation of this policy, are urged to contact their supervisor, another County supervisor or the Director of Employee Services. The Director of Employee Services may also initiate an investigation should such an alleged practice come to his/her attention. A thorough investigation of the facts will be promptly conducted. If evidence supports such a claim, immediate, appropriate and corrective action will be taken. Under the law, individuals are protected from retaliation. Every effort will be made to preserve confidentiality consistent with conducting a thorough investigation.

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