#### PART I POLICY STATEMENT

It is the policy of St. Lawrence County (SLC) to provide equal employment opportunity to all people without regard to race, color, creed/religion, gender identity, marital status, sex, sexual orientation, age, national origin, disability, or Vietnam Era Veteran status. As Chairman of the St. Lawrence County Board of Legislators, I am personally committed to assuring that St. Lawrence County will act affirmatively to develop avenues of entry and mobility for all people regardless of protected status through the following activities:

- --- Development of programmatic approaches to the elimination of any unjust exclusionary employment practices, policies, and consequences
- --- Development of educational and training programs for all employees, with due emphasis on our goal of providing advancement opportunities regardless of protected status; and
- --- Development of mechanisms for swift and judicious resolution of problems of human rights discrimination consistent with our policy, and other applicable legal statutes including: Section 503 of the Rehabilitation Act of 1973, Vietnam Era Veterans Act of 1974, Executive Order 11246 and the Equal Employment Opportunity Act.

To effectuate this policy, we have designed a plan, which conforms to all relevant Federal and State nondiscrimination, equal employment opportunity and affirmative action regulations. It applies equally to all job classifications and titles in St. Lawrence County and all types of appointments under the County's jurisdiction. It governs all of our employment policies, practices and actions including but not necessarily limited to: recruitment, interviewing, employment, training, disciplinary actions, rate of pay, or other compensation, reclassification, reallocation, promotion, demotion, termination, and all employee benefits. Reasonable accommodations will be made for individuals having disabilities.

To assist me in my responsibility as chief executive officer for an effective affirmative action/equal employment opportunity program, I shall appoint an Affirmative Action/Equal Employment/ADA (AA/EEO/ADA) Officer, upon approval of the Board of Legislators. The AA/EEO/ADA Officer will advise and assist the St. Lawrence County Administrator who shall be responsible for the day-to-day implementation of necessary programs and policies as outlined in the Affirmative Action/Equal Employment Opportunity Plan. I will see that sufficient resources necessary for the execution of the program responsibilities will be provided.

The mission of St. Lawrence County is to ensure the fulfillment of our policy to provide equal employment opportunity for all - the right of every person to be employed and to advance on the basis of merit, ability, and potential. Affirmative action considerations will be an integral part of all County activities performed in the furtherance of our mission and in meeting our responsibilities to the County's citizens.

St. Lawrence County will employ all necessary procedures to ensure that this policy continues to be fully supported and expects that all department heads, in all activities, undertake a personal commitment to assure themselves that the principles of equal opportunity are fully implemented in every action they take.

<ul> <li><u>AFFIRMATIVE ACTION - WHAT IT IS:</u></li> <li>1. An ongoing Program – designed to correct past discrimination</li> <li>2. Race and sex conscious Policies and Practices aimed at achieving Equal Employment Opportunity</li> <li>3. A method used to reach the goal of equal</li> </ul>	EQUAL EMPLOYMENT OPPORTUNITY – WHAT IT IS: 1. Equal access to jobs 2. Applicable to all citizens 3. Essential to sound employment practices 4. Required by state and federal law
<ul><li>9. A method used to reach the goal of equal opportunity</li><li>4. Required by Federal law for agencies receiving federal assistance</li></ul>	
WHAT IT IS NOT:	WHAT IT IS NOT:
<ol> <li>A piece of paper</li> <li>So Called "Reverse Discrimination"</li> <li>A program which assumes present equality can be built on a foundation of past discrimination.</li> <li>A quota system.</li> </ol>	<ol> <li>A guarantee of jobs</li> <li>Ethnic group specific</li> <li>Gender specific</li> <li>A social program</li> </ol>

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5/23/2022

William Sheridan, St. Lawrence County Board of Legislators, Chair

Date

## PART II DISSEMINATION OF POLICY AND PLAN

St. Lawrence County will disseminate its Affirmative Action/Equal Employment Opportunity Plan and Programs, internally and externally, as follows:

- 1. The Master Copy of the St. Lawrence County Affirmative Action/Equal Employment Opportunity (AA/EEO) Plan will be maintained in the St. Lawrence County Human Resources Office.
- 2. A copy of St. Lawrence County's AA/EEO Policy Statement (Part I of the SLC AA/EEO-Plan) will be posted <u>in</u> every county building and facility on at least one bulletin board that is conspicuous and accessible to employees and, to the extent possible, to the public.
- 3. The SLC AA/EEO Plan will be made available to employees and the public via the County Web page and, upon request, a written copy from the County Human Resources Office.
- 4. Upon revision of the SLC AA/EEO Plan an electronic notice will be distributed to the St. Lawrence County Board of Legislators and Department Heads (for dissemination to all employees) and noted on the County Web site on the Human Resources Department page.
- 5. All members of St. Lawrence County, wherever applicable, shall indicate that the County is an Equal Opportunity/Affirmative Action Employer.
- 6. Each employee of St Lawrence County will be provided a copy of the SLC AA/EEO Policy Statement.

## PART III IMPLEMENTATION RESPONSIBILITIES

#### A. Chairman, St. Lawrence County Board of Legislators

Consistent with applicable laws, rules and regulations, and Executive Orders, ultimate responsibility for the achievement of equal opportunity in St. Lawrence County through the use of the Affirmative Action/Equal Employment Opportunity (AA/EEO) Plan and other means lies with the Chairman of the St. Lawrence County Board of Legislators.

#### B. Affirmative Action/Equal Employment/ADA Officer

The AA/EEO/ADA Officer advises and assists the County Administrator with the daily administration of the St. Lawrence County Affirmative Action/Equal Employment Opportunity Plan. They shall keep the Chairman of the St. Lawrence County Board of Legislators updated on critical issues. The Board of Legislators shall appoint the AA/EEO/ADA Officer for a term of 4 years in a non-compensatory capacity.

The duties of the AA/EEO/ADA Officer include, but are not limited to, the following:

- Advises and assists the County Administrator in developing and implementing policies and procedures necessary to ensure equal employment opportunities;
- Investigates and attempts to resolve complaints of discrimination by employees and applicants;
- Monitors St. Lawrence County's employment activities to ensure equal opportunity;
- Conducts an annual review of the Affirmative Action/Equal Employment Opportunity Plan and recommends revisions, publishing a new cover page when necessary.
- Develops and conducts training programs for Dept. Heads regarding equal employment opportunity;
- Assures that reasonable accommodations are provided to all known qualified disabled applicants and employees;
- Participates in conferences, meetings, forums, discussion groups, panels and seminars concerned with Affirmative Action, Equal Employment Opportunity, and American with Disabilities Act;
- Keeps abreast of and interprets laws, rules, regulations and court decisions impacting on St. Lawrence County's Equal Employment Opportunity activities;
- Assists and advises all departments in St. Lawrence County on AA/EEO issues;
- Develops an internal discrimination complaint procedure;
- Informs complainants of their rights and external avenues of redress;

- Implements and administers the AA/EEO Plan;
- Maintains all personnel records in a manner consistent with applicable laws and regulations as well as the requirements of the AA/EEO Plan;
- Develops and maintains all personnel directives in a manner that is consistent with applicable laws and regulations and the AA/EEO Plan;
- Continuously reviews the jurisdictional classification system, examination procedures and policies, benefit packages, leave policies, training and career development programs and other employment practices to assure that all such practices conform with current legal and regulatory requirements, and the AA/EEO Plan;
- Ensures all individuals regardless of protected class have equal access to all employment and training opportunities.
- Compiles the annual federal EEO 4 report;

#### C. Responsibilities of Department Heads and Elected Officials

The county department heads and elected officials of St. Lawrence County will ensure that AA/EEO goals and objectives are met within their respective program areas.

Obligations shall include, but are not limited to, the following:

- Provides all staff members with equal opportunity to participate in training and career enrichment activities, including workshops, seminars, and tuition reimbursement;
- Conducts, and participates in AA/EEO training programs for staff;
- Participates in AA/EEO training provided to supervisory and management personnel;
- Consistently and equitably applies discipline, rules, and other personnel actions and procedures;
- Provides accurate reports and information as required for AA/EEO purposes.

## PART IV VIETNAM ERA VETERANS

#### A. Policy Statement

Pursuant to Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRRA), Vietnam Era Veterans are a protected class. St. Lawrence County will take affirmative action to employ and advance in employment qualified disabled veterans and veterans of the Vietnam era. Such action applies to employment practices, including, but not limited to, the following:

Hiring, promotion, demotion, transfer, recruitment or recruitment advertising, rates of pay or other forms of compensation, as well as selection for training.

"Reasonable accommodation" will be made for physical and mental impairment of disabled veterans (see attachment 1 for the Accommodation Application and attachment 2 for Medical Inquiry Form).

#### B. **Definitions**

For the purpose of compliance with this plan, a Vietnam Era Veteran is considered to be:

Any person who served on active duty, in the Armed Forces of the U.S., any part of which occurred between January 1, 1963 and May 7, 1975 and was discharged or released under honorable conditions. A member of the National Guard or Reserve component of the Armed Forces cannot be afforded the designation as a Vietnam Era Veteran unless the service resulted from a federalization of the Guard or the Reserve duty was for other than training purposes.

For compliance with this plan, reasonable accommodation is considered to be:

Any accommodation, such as making facilities accessible, modifying equipment, providing readers, and use of job restructuring, part - time or modified work schedules, which does not cause an undue hardship.

#### PART V DISABLED PERSONS

#### A. Policy Statement

Pursuant to Section 503 of the Federal Rehabilitation Act of 1973, as Amended, as well as, Title I of the Americans with Disabilities Act (ADA) as Amended, St. Lawrence County will take affirmative action to employ and advance in employment qualified disabled individuals, i.e., those who with or without reasonable accommodations, can perform the essential functions of the job in question. Such action applies to employment practices, including, but not limited to, the following:

hiring, promotion, demotion, transfer, recruitment or recruitment advertising, rates of pay or other forms of compensation, as well as selection for training.

While applicants and employees who have a disability are members of one of the protected classes included under the provisions of the main body of this AA/EEO Plan, this section addresses additional affirmative action and equal employment opportunity concerns unique to them.

The AA/EEO/ADA Officer will assist covered applicants or employees or any managers who need advice regarding the specific ways that the AA/EEO Plan affects disabled persons.

#### **B.** Covered Individuals

For purposes of coverage under this Affirmative Action/Equal Employment Opportunity Plan, a disabled individual is one who:

- 1) has a physical or mental impairment which substantially limits one or more major life activities,
- 2) has a record of such impairment which substantially limits a major life activity, or
- 3) is regarded (actual or perceived) as having an impairment that is not both transitory and minor ("regarded as"). A transitory impairment is an impairment with an actual or expected duration of 6 months or less.

The term "physical or mental impairment" is defined as any physiological disorder or condition, cosmetic, disfigurement, or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin and endocrine. They also cover any mental or psychological disorder, such as intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

An impairment need not prevent or severely or significantly limit a major life activity to be considered "substantially limiting." Nonetheless, not every impairment will constitute a disability. The term "substantially limits" should be construed broadly in favor of expansive coverage to the maximum extent permitted by the terms of the ADA. The determination of whether an impairment substantially limits a major life activity requires an individualized assessment. The primary focus of the ADA is on whether discrimination occurred therefore, the determination of disability should not require extensive analysis. Although determination of whether an impairment substantially limits a major life activity as compared to most people will

not usually require scientific, medical, or statistical evidence, such evidence may be used if appropriate. An individual need only be substantially limited, or have a record of a substantial limitation, in one major life activity to be covered under the first or second prong of the definition of "disability."

The "major life activities" include but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, sitting, reaching, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, working, and operation of a major bodily function, including but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions.

## C. Self - Identification of Disabled Employees and Applicants

St. Lawrence County will take affirmative action and provide equal employment opportunities with respect to those applicants or employees of whose disability the County has actual knowledge.

In order to include all qualified disabled individuals in the Affirmative Action/Equal Employment Opportunity Plan, St. Lawrence County shall invite all applicants and employees who believe they are disabled, as defined above, to identify themselves. Under all circumstances self-identification is to be made voluntary. There shall be no adverse treatment if an individual chooses not to participate in a self-identification survey.

All information regarding an individual's disabilities will be kept confidential by the AA/EEO/ADA Officer and kept in files separate from personnel files. If an employee wishes to benefit from the Act or when a disabled applicant is hired, with his/her consent the information regarding the disability may be shared as follows:

- Supervisors and managers may be informed regarding restrictions on the work or duties of disabled individuals and regarding necessary accommodations;
- First aid and safety personnel may be informed when and to the extent appropriate, if the condition might require emergency treatment;
- Government officials investigating compliance with affirmative action statutes shall be informed;
- These individuals must keep the information confidential.

St. Lawrence County will encourage all existing employees to participate in a self - identification survey so that records will be accurate. The Human Resources Director will make the survey forms available to all new employees, to all newly disabled employees, and to employees who wish to change their identification.

#### D. Reasonable Accommodations

Pursuant to Title III of the Americans with Disabilities Act, of July 1992, which states that if it is determined that an applicant is qualified to perform the essential functions of the job in question with some accommodations, such accommodation will be provided within reason. A qualified candidate will not be rejected for examination, appointment or promotion solely because some reasonable accommodation needs to be made to accommodate the limitations of the individual. If an applicant or employee cannot perform the job duties required even with accommodation, St. Lawrence County is not required to employ the individual in that position.

In order to assure reasonable accommodations it must be a shared responsibility. Therefore, it is important for the employee to let management know, as soon as possible, the type of reasonable accommodation(s) needed.

#### E. Retention of Workers Who Become Disabled

St. Lawrence County will make every effort to retain employees who acquire disabilities while in service. Before employees are terminated as being too disabled to continue work, the Human Resources Director will be informed so that every alternative opportunity can be examined before the employee actually leaves service.

#### PART VI SYSTEMIC CONSIDERATIONS IMPACTING ONGOING AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY IMPLEMENTATION

St. Lawrence County will review and evaluate all personnel policies and procedures to assess their impact upon protected class representation in the agency work force. St. Lawrence County will develop procedures which provide for the routine interfacing of the AA/EEO/ADA Officer (Human Resources Director), County Administrator, and Department Heads to assure that equal employment opportunity considerations are continually part of the critical phases of St. Lawrence County's employment process.

St. Lawrence County will continue to explore the ways in which county and statewide policies, designed to improve the quality of work life, are connected to equal employment opportunity efforts. Some areas for exploration include:

- a. Sexual harassment policies,
- b. Sexual preference issues,
- c. Flexible, remote, and part-time work opportunities,
- d. Family and Medical Leave Act enforcement,
- e. Americans with Disabilities Act as Amended enforcement,
- f. Drug free work place,
- g. Section 504 Compliance Policy.

St. Lawrence County will study equal employment opportunity/affirmative action laws and policies mandated by the Federal and State governments to ensure, to the best of our ability, that we are in compliance.

#### PART VII DISCRIMINATION COMPLAINT PROCEDURE

#### A. Introduction

Equality of opportunity is a civil right in New York State. Every employee and applicant for employment has the right to seek employment and to be employed in a climate that is free from restraint, intimidation, harassment or coercion.

This complaint procedure has been devised to provide for uniformity and equity in the resolution of allegations of discrimination in employment. It will be well publicized throughout the departments of St. Lawrence County.

#### B. Purpose

This procedure has been designed to allow St. Lawrence County the opportunity to resolve complaints internally. It is in no way intended to duplicate or circumvent options available to claimants through any of the following:

- 1) employee organizations,
- 2) the New York State Division of Human Rights,
- 3) the Equal Employment Opportunity Commission,
- 4) U.S. Justice Department/Office for Civil Rights,
- 5) compliance agency designated under Section 503 of the Rehabilitation Act of 1973,
- 6) Office of Federal Contract Compliance Programs,
- 7) other regulating agencies as may be appropriate, and
- 8) the judicial system use of this procedure will not suspend any time limitations for filing complaints otherwise set by Law, Rule or Regulation.

This procedure applies to all complaints of discrimination in employment based on race, color, national origin, creed, age, sex, sexual orientation, gender identity or expression, marital status, familial status, religion, mental or physical disabilities, military status, genetic predisposition or carrier status, arrest record or Vietnam Era Veteran status. Any employee or applicant for employment can use it. Complaints may be based on any alleged act or omission in the nature of discrimination including, but not limited to:

Interviewing	Shift Assignment	Hiring
Promotion	Job Assignment	Transfer
Discipline	Working Conditions	Dismissal
Performance Evaluations	Harassment (Race, Sex, Color,	National Origin, Etc.)
Training Opportunities	Agency policies and other term	s/conditions of employment

Each employee has the right to representation by his or her labor representative in the event that the complaint involves a possible violation of contract.

## C. Definitions

Discrimination - unlawful consideration or treatment of a person or group (either intentional or unintentional) based on race, color, national origin, creed, age, sex, sexual orientation, gender identity or expression, marital status, familial status, religion, mental or physical disabilities, military status, genetic predisposition or carrier status, arrest record, or Vietnam Era Veteran status.

### **D.** Discrimination in Employment

- 1. Situations where the failure or refusal to hire, promote or train any individual or otherwise treat the individual equally with respect to compensation, terms, conditions or privileges of employment would not have occurred but for race, color, national origin, creed, age, sex, sexual orientation, marital status, religion, mental or physical disabilities, military status, genetic predisposition or carrier status, arrest record, or Vietnam Era Veteran status.
- 2. Efforts to limit, segregate, or classify employees in such a way as to deprive or tend to deprive an individual of employment opportunities on the basis of the person's race, color, national origin, creed, age, sex, sexual orientation, gender identity or expression, marital status, familial status, religion, mental or physical disabilities, military status, genetic predisposition or carrier status, arrest record, or Vietnam Era Veteran status.

### E. Discrimination in Employment Complaint Procedure

#### 1. The Process:

- a. Any person with a complaint of discrimination should contact the St. Lawrence County AA/EEO/ADA Officer (Human Resources Director) or the County Administrator. Complaints should be made within sixty (60) working days of the occurrence of the event, giving rise to the complaint. If the deadline is missed because of circumstances beyond the complainant's control, the AA/EEO/ADA Officer will make the determination as to the reasonableness of requests and may extend the period to file to a maximum of one (1) year.
- b. The AA/EEO/ADA Officer will advise the complainant, explain the internal procedure, explain the other options available to the employee including time limitations for filing complaints with State or Federal compliance agencies and assist in completing the complaint form (Attachment 3).
- c. The AA/EEO/ADA Officer shall interview the complainant and study relevant documents.
- d. The AA/EEO/ADA Officer shall interview witnesses and further investigate the situation. At each opportunity, the Affirmative Action Officer will seek conciliation or an informal settlement that is satisfactory to the parties concerned.
- e. The AA/EEO/ADA Officer will discuss any remedies that are proposed with the County Attorney as to the appropriateness, feasibility, and legality of the remedies.

- f. When the investigation is completed, the AA/EEO/ADA Officer shall prepare a written report including recommendations (as reviewed by the County Attorney) for the County Administrator.
- g. The County Administrator shall issue the final decision and recommendations in writing to the parties concerned.
- h. The County Administrator's decision is final. If the complainant is not satisfied with the attempts to resolve the problem, the claimant may seek remedy through other sources.
- i. At any point in the procedure, the claimant may withdraw the charge by submitting a written statement to the AA/EEO/ADA Officer.

#### 2. Time Frame:

The AA/EEO/ADA Officer will submit a written report including recommendations within forty five (45) working days beginning from the date on which the written complaint is filed. The County Administrator shall reach a decision and provide written recommendations to all parties within fifteen working days. Any of the time limits may be waived for good reason by the written mutual consent of the parties.

#### 3. Confidentiality:

The substance of the investigation will remain confidential. No party or staff member shall disclose the results of the investigation or parts thereof. When warranted, the Affirmative Action Officer will inform all charged parties of the factual allegations and give them an opportunity to respond to all charges and evidence.

#### 4. Accessibility:

St. Lawrence County will provide such assistance as may be necessary to enable a complainant to understand and participate in the complaint process. This may include sign language interpreters, wheelchair attendants, Braille copiers, sound amplification equipment or foreign language interpreters.

#### 5. Retaliation:

Any employees who participate in the procedure may do so without fear of retaliation. It will be made clear that retaliation against an employee who has filed a discrimination complaint will result in disciplinary action.

#### 6. Outcomes:

The outcome of an investigation is either dismissal of the complaint or remedial action. The complainant will be notified in writing of the outcome.

#### 7. Follow-up:

The AA/EEO/ADA Officer will maintain a log and file of complaints received. Six weeks from the date of a decision under paragraph 1g above, the Affirmative Action Officer will determine whether the County Administrator's directives have been carried out, or whether the case needs to be re - opened. The findings will be reported to the County Administrator for appropriate action or closure

#### 8. Record Keeping:

The County will keep a record of the status and determination of all complaints for at least three years. Cases that are unresolved and/or subject to external reviews will be maintained indefinitely or until they are resolved. The record copy of these complaints, reports or investigation and decisions rendered, will be kept in the Human Resources Department, but segregated from the individual's official personnel record. This should not be construed to indicate that records of disciplinary actions will be excluded from the official personnel records of those concerned.

### F. Section 504 and Title VI Grievance Complaint Procedure

#### 1. The Process:

It is the policy of St. Lawrence County not to discriminate on the basis of disability. St. Lawrence County has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) of the U.S. Department of Health and Human Services regulations implementing the Act or Title VI. Section 504 prohibits discrimination on the basis of disability in any program or activity receiving Federal financial assistance. The Law and Regulations may be examined in the office of Jason Pfotenhauer, Director of Planning 315-379-2292, who has been designated to coordinate the efforts of St. Lawrence County to comply with Section 504 and Title VI. Any person who believes she or he has been subjected to discrimination on the basis of disability in any program or activity receiving Federal financial assistance at St. Lawrence County may file a grievance under the procedure established under the Title VI Plan. The Title VI Plan and complaint form can be obtained from the SLC website www.stlawco.org under the Human Resources Department tab or by calling the SLC Planning Department at 315-379-2292.

#### 2. Retaliation:

It is against the law for St. Lawrence County to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance. Any employees who participate in the procedure may do so without fear of retaliation. It will be made clear that retaliation against an employee who has filed a discrimination complaint will result in disciplinary action.

## PART VIII TRAINING

#### A. Statement of Commitment to Training

Training of all employees is a necessary element in the implementation of the County's Affirmative Action/Equal Employment Opportunity Program. The Administration of St. Lawrence County is committed to training as a means of providing managers and supervisors with the skills needed to work effectively with a widely diverse representative work force. All employees will have access to information on Affirmative Action/Equal Employment Opportunity and their rights and responsibilities in these matters.

#### B. Purpose

The purpose of the training program is to develop knowledge and understanding of the affirmative action/equal employment opportunity plan and the reason for its existence in the public sector. The training component has the following goals:

- provide information on the AA/EEO Plan in the public sector;
- expand the knowledge of the AA/EEO legal processes and their application in the work environment;
- develop understanding of AA/EEO principles, goals and objectives in the public sector;
- identify the County's specific affirmative action goals and their impact on County functions and overall mission;
- increase human awareness and sensitivity towards EEO issues;
- increase employees' understanding of the need for AA/EEO principles and programs.

#### C. Assignment of Responsibility for Training

Responsibility for the overall program coordination and implementation is assigned to the AA/EEO/ADA Officer (Human Resources Director). They are responsible for the appropriateness and accuracy of curriculum content, and for establishing training priorities so that the affirmative action/equal employment opportunity training supports the overall Affirmative Action/Equal Employment Opportunity Plan.

The Human Resources Director will provide training to Department Heads and Department Heads will be responsible for the provisions of training and the logistics involved in scheduling and presenting training programs throughout the County with the minimum disruption of everyday County operations.

#### PART IX ANNUAL REPORT ON

## AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY ACTIVITIES OF ST. LAWRENCE COUNTY

An annual report shall be prepared by the AA/EEO/ADA Officer, subject to review and revision by the County Administrator. Separate reports may include as applicable:

- Affirmative Action goals accomplished that year goal identification will be a continuing process.
- An organizational profile (which is a workforce analysis showing a breakdown of job titles in applicable collective bargaining agreements ranked from lowest to highest paid within each department, in order of salary ranges. For each job title the total number of incumbents and the number of male and female incumbents and the number of employees in each minority group)
- Job group analysis (jobs with similar content, wage rates, and opportunities combined)
- Placement of incumbents in job groups (states percentage of minorities and women available for employment in a given job group).
- Determination of availability (availability of minorities and women with the required skills for each job group by considering the following factors for determining the percentages :
  - Census data to determine external availability in the recruiting area
  - Comparison of incumbency to availability comparison of the percentage of minorities and women placed in each job group with the availability/census data.
- Placement goals establish a percentage annual placement goal equal to the available numbers of a specific group in which the percentage of minorities and women employed in a particular job group is less than would be expected given their availability in that job group. (not meant to be quotas or establish preferences for one group or to supersede merit selection principles).

#### PART X GOALS/ONGOING INITIATIVES ACTION ORIENTED PROGRAMS

The goals of the St. Lawrence County (SLC) Affirmative Action/Equal Employment Opportunity Plan integrate considerations into the routine personnel operations of SLC. These considerations are fluid, voluntary, good faith objectives designed to foster equal employment opportunities for all staff members in accordance with the County values and organizational mission, applicable New York State and Federal Law, and existing personnel policies and practices. The highlights of the established goals and ongoing practices include but are not limited to:

## **Goals/Initiatives**

### A. Policy and Procedures

- □ Provide all applicants and employees who have a disability an equal opportunity in competing, obtaining and retaining employment.
- □ Ensure compliance with County policy and applicable disability rights law.
- □ Revise policies where appropriate
- □ Provide employment benefit information to all employees.
- □ Ensure an Equal Opportunity Employer statement is on examination announcements, employment application and in advertisings.
- □ Ensure the SLC Discrimination Complaint Procedures is on the Human Resources website under: AA/EEO Plan.
- □ Ensure benefits and compensation, personnel practices and procedures, training and other employment practices are non-discriminatory and are in compliance with current legal requirements.
- □ Engage in an interactive process with any employee or applicant requesting an accommodation in order to determine an appropriate accommodation for their disability as defined by law.

#### **B. Recruiting/Promotional Opportunities**

- □ Ensure Job Postings and Civil Service Exam announcements are distributed to all County Departments, SLC public agencies, and are also available on the SLC County website.
- □ Encourage individual departments to participate in career information programs within the community and to consider alternative recruitment sources for the purpose of reaching a diverse group of applicants.
- □ Provide a tuition assistance program to SLC County employees for their continuing education in an effort to increase the opportunity for upward mobility.
- □ Ensure career ladders are in place within Civil Service Law that permits the movement of capable lower level employees to higher classes through demonstrated merit and fitness and the elimination of unnecessary barriers in the form of non-related qualification requirements for the higher level classes.

- □ Provide trainees and paraprofessional positions with minimum qualifications commensurate with duties and responsibilities for employee development purposes.
- □ Utilize Civil Service Law Section 52 in Exams, when applicable, to allow employees who have held the position for at least two years in the non-competitive class the opportunity to compete in promotional examinations.
- □ Utilize Civil Service Law Section 55, when appropriate, to support applicants with disabilities in testing and interviewing for SLC County employment.
- □ Partner with One Stop Career Center which is located in the St. Lawrence County Human Services building and provides economic vitality of our county by building and maintaining a quality workforce development system that strengthens and provides economic, educational, and developmental opportunities for all citizens and employers.
- □ Provide additional credits on examinations can be awarded to successful candidates who have established veteran status in accordance with Civil Service Law.
- □ Ensure seniority credits are added to the scores of passing candidates in accordance with Civil Service Law for promotional exams.
- □ Partner with SLC Veterans Service Department which is a dedicated County resource for assisting Veterans in education and employment opportunities.
- □ Utilize intern and trainee programs to increase the County's efforts to build a diverse workforce of knowledge, skills and abilities.
- □ The physical and mental job qualifications identified for all County jobs are governed by the provisions of New York State Civil Service law. Review qualifications to ensure job qualification requirements are job-related and consistent with County necessity and safety.

#### C. Staff Development/Employee Relations

- Provide SLC Leadership a training day each year to improve management skills. Affirmative Action/EEO, Diversity and Inclusion, Sexual Harassment, Hostile Work Environment and Workplace Violence, and Ethics are among the topics provided.
- □ Provide SLC Department Heads with a leadership track education series each year through a program such as "ThinkHR" comprised of practical courses designed to increase supervisory awareness of their expectation, roles and responsibilities.
- □ Provide formal and informal dispute resolution for SLC employees by the Human Resources on an as needed basis.

 $\Box$  Investigate formal complaints of discrimination in a timely manner and responds with findings or recommendations within the timeframe prescribed in the County complaint procedure.

- □ Review information from exit interviews on an ongoing basis to improve retention.
- □ Increase job satisfaction and aid retention by providing transfer opportunities within the County departments.

# Attachment 1

4

	Lawrence County's nodation Request Form
	Date:
Name:	Phone:
Address:	
Identify your disability:	
Identify your accommodation ideas:	
Please have your medical provider compl AA/EEO Plan) and return it along with th	ete a "Medical Inquiry Form" (Attachment #2 of the nis form to your Department Head or Human Resources.
Signature	
Date form received:	
Signature of person receiving form:	

# Attachment 2

# Medical Inquiry Form

A. Questions to help d	etermine whether an employee has a disability								
For reasonable accommod limits one or more major	dation under the ADA, an employee has a disability if life activities or a record of such an impairment.	he or she has an impairme	nt that substantially						
Does the employee have a	a physical or mental impairment?	Yes 🗆	No 🗆						
If <i>yes</i> , what is the impairm	ment or the nature of the impairment?								
what limitations the empl medication, medical supp accommodations or auxili psychotherapy, behaviora lenses.	estion based on what limitations the employee has who oyee would have if no mitigating measures were used lies, equipment, hearing aids, mobility devices, the us iary aids or services, prosthetics, learned behavioral or l therapy, and physical therapy. Mitigating measures of	. Mitigating measures include e of assistive technology, r r adaptive neurological mo	ude things such as reasonable difications,						
Does the impairment subs most people in the genera	stantially limit a major life activity as compared to l population?	Yes 🗆	No 🗆						
	limitations when the impairment is active.								
What major life activi	ty(s) (includes major bodily functions) is/are affected	?							
Image: BendingHearingReachingSpeakingNot ApplicableImage: BreathingInteracting With OthersReadingStandingOther: (description)Image: Caring For SelfLearningSeeingThinkingImage: ConcentratingLiftingSittingWalkingImage: EatingPerforming Manual TasksSleepingWorking									
What Major bodily functi	on(s) is/are affected?								
<ul> <li>Bladder</li> <li>Bowel</li> <li>Brain</li> <li>Cardiovascular</li> <li>Circulatory</li> </ul>	<ul> <li>Digestive</li> <li>Endocrine</li> <li>Genitourinary</li> <li>Hemic</li> <li>Immune</li> <li>Lymphatic</li> <li>Musculoskeletal</li> <li>Neurological</li> <li>Normal Cell Growth</li> <li>Operation of an Organ</li> </ul>	□ Other: (descri	e Organs & Skin						

## B. Questions to help determine whether an accommodation is needed.

An employee with a disability is entitled to an accommodation only when the accommodation is needed because of the disability. The following questions may help determine whether the requested accommodation is needed:

What limitation(s) is interfering with job performance?

What job function(s) is the employee having trouble performing because of the limitation(s)?

How does the employee's limitation(s) interfere with his/her ability to perform the job function(s) of employment?

C. Questions to help determine effective accommodation options.

If an employee has a disability and needs an accommodation because of the disability, the employer must provide a reasonable accommodation, unless the accommodation poses an undue hardship. The following questions may help determine effective accommodations:

Do you have any suggestions regarding possible accommodations to improve job performance?

How would your suggestions improve the employee's job performance?

## **D.** Other questions or comments.

Medical Professional's Signature

Date

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services. Attachment 3 (page 1)

## AFFIRMATIVE ACTION DISCRIMINATION COMPLAINT FORM

The purpose of this form is to record information required to initiate an investigation into an alleged violation of St. Lawrence County's Affirmative Action Policy. All reasonable efforts will be made to maintain the confidentiality of the parties involved during the complaint procedure.

It is unlawful to retaliate against an employee or any other person for filing a complaint or for cooperating in an investigation of a complaint. All parties to a complaint may have a personal advisor/union representative assist them throughout the process.

Date Filed:	Date(s) of Alleged Discrimination:						
A. Check One:   Employee	□ Applicant						
B. Name (Print):		Department:					
C. Type of alleged discrimination or ac	t (please check ap	plicable category):					
<ul> <li>Race</li> <li>Color</li> <li>National Origin</li> <li>Age</li> <li>Sex</li> <li>Gender Identity or Expression</li> <li>Sexual Orientation</li> <li>Religion/Creed</li> <li>D. Name of individual(s) you believe d</li> </ul>	iscriminated again	<ul> <li>Marital Status</li> <li>Familial Status</li> <li>Mental/Physical Disability</li> <li>Military Status</li> <li>Genetic Predisposition or Carrier Status</li> <li>Arrest Record</li> <li>Vietnam Era Veteran Status</li> <li>Other</li> </ul>					
F. Description of Complaint - please lis relevant facts and statements:	t the sequence of	events, including dates, if possible, and any					
B. Name (Print):       Department:         C. Type of alleged discrimination or act (please check applicable category):       Marital Status         Race       Marital Status         Color       Familial Status         National Origin       Mental/Physical Disability         Age       Military Status         Sex       Gender Identity or Expression         Sexual Orientation       Arrest Record         Vietnam Era Veteran Status							
(If additional writing space is needed, p							
To the best of my knowledge and belief submit this complaint under the St. Law		nation is complete, true and accurate. I hereby firmative Action Complaint Procedure.					

Signature of Complainant:

Date: \_\_\_\_\_

Attachment 3 (page 2)

## AFFIRMATIVE ACTION DISCRIMINATION COMPLAINT FORM

Complaint Received by (Name/Title):

Date Received:

The AAO provided the final written Report of Investigation for St. Lawrence County Affirmative Action Complaint #\_\_\_\_\_\_ to St. Lawrence County Administrator.

St. Lawrence County Affirmative Action Officer (Print and Sign Name)

4 Copies:

- 1. County Administrator (Original)
- 2. Director of Human Resources
- 3. County Attorney
- 4. Department Head

## PART IX ANNUAL REPORT ON AFFIRMATIVE ACTION ACTIVITIES OF ST. LAWRENCE COUNTY

St. Lawrence County (SLC) reaffirms its commitment to equal employment opportunity. SLC will not discriminate against any employee or applicant in employment decisions based on race, age, color, religion/creed, national origin, gender identity, sex, sexual orientation, status as a protected veteran or disability. Decisions in hiring, promotions, demotions, transfers, working conditions, compensation, training, or termination will not be made with unlawful discrimination. This legal responsibility and ethical commitment are demonstrated through the Affirmative Action/Equal Employment Plan herein after referred to as the Affirmative Action Plan. The Plan further reaffirms a commitment to equal employment opportunities and affirmative action to be communicated to and supported by all SLC employees.

The Affirmative Action Plan is updated every year in keeping with our commitment to the principles of equal employment opportunity/affirmative action plan and regulations. Also, all State and local governments with 100 or more employees are required to submit demographic workforce data, including data by race/ethnicity, sex, job category, and salary band every two (2) years, in the form of an EEO-4 report which is under section 709(c) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e-8(c), 29 CFR 1602.30 and .32-.37. The EEO-4 report was submitted in calendar year 2021 and accepted. In addition to this report, the Office of Civil Rights, Office of Justice Programs, required SLC to submit the Equal Employment Opportunity Plan Utilization Report in accordance with the grant conditions set forth by the Omnibus Crime Control and Safe Streets Act of 1968, Juvenile Justice and Delinquency Prevention Act of 1974, and the Victims of Crime Act of 1984 for a grant awarded to the SLC Community Services Department by the Department of Justice. This plan was also approved which enabled SLC to secure the grant.

						compa	red to								
	St	t. Law	rence	Count	y Gov	ernmei	nt Wo	rkforc	е Рори	lation	Figur	es			
	SLC	, New `	Jew York - Workforce 2020 Census						SLC Government - Workforce 2021						
	Total	W	В	н	A	AI/AN	A/PI	Total	w	В	Н	А	NH/PI	AI/AN	2
Total Labor Force	45,100	10103	NUS 8		10154		1 P.Y. 7	829		0	1, 24, 24	112	0		0
Male Population	23.316	22,390	285	253	199	183	6	335	330	0	2	0	0	1	2
% of Total Labor Force	No. of Lot	49.6%	0,6%	0.6%	0.4%	0.4%	0.0%		39.8%	0.0%	0.2%	0.0%	0.0%	0.1%	0.2%
Female Population	21,784	20,744	285	334	213	201	7	494	488	0	2	2	0	2	0
% of Total Labor Force	5.15	46.0%	0.6%	0.7%	0.5%	0.4%	0.0%		58.9%	0.0%	0.2%	0.2%	0.0%	0.2%	0.0%

In order to identify possible discriminatory practices we must look at relevant statistics.

According to 2020 Census data, St. Lawrence County, New York has a very small minority labor force population. White males make up 49.6% of the labor force while white females make up 46.0%. The next largest ethnic group makes up 0.7% of the labor force representing Hispanic females followed by Black males, Hispanic males, and Black females making up 0.6% of the labor force each. Diversity continues to present challenges to all employers due to the availability of minorities in our communities.

Conversely, in SLC Government (employer) the labor force has a majority of white females making up 58.9% of the labor force with white males making up 39.8%. The next largest ethnic groups in the labor force making up 0.2% of the population each includes female Hispanics, male Hispanics, female Asians and males identifying with two or more ethnicities.

There was one claim of racial discrimination filed in calendar year 2021. After a thorough investigation, it was determined that the claimant did not hear the entire conversation and made a generalization of the conversation overheard. The respondents made formal apologies to the claimant and were provided re-training on discrimination.

Ethnicity is just one characteristic that is analyzed in the employment environment. Other protected groups are identified in the following chart.

Protected Category	Defined as:
Age	Age (40 years or older)
Color	Skin color
Disability	Perceived or known physical or mental disability, accommodations for disability
Gender	Sexual harassment, sex discrimination, pregnancy, child bearing/rearing, wages based on gender, status as a parent
National Origin	Place of birth, parentage
Race/Ethnicity	Examples: African American, Chinese American, Caucasian, Hispanic, etc.
Religion	Belief, practice, and/or celebration of one's spiritual faith; accommodations for religious holidays, practice, etc.
Retaliation	Adverse action taken against a person for participation in any EEO complaint whether alleged or validated.
	EMPLOYMENT DECISIONS CANNOT BE BASED ON ANY OF THESE EEO PROTECTED CATEGORIES

## **Definitions of Protected Groups**

SLC must look at other relevant statistics to ensure affirmative action and equal employment opportunities exists. Other relevant statistics are identified in the following chart.

	1. 25	Other Relevant SLC Statistics - February 2022											
	Employees	<b>Competitive Positions</b>	<b>Elected Positions</b>	<b>Exempt Positions</b>	Unclassified Positions	Labor Positions	Pending JC Positions	Non-Competitive	Union Positions	Temporary Positions	Employees over 40 y/o	Female Employees	Male Employees
Total			Farmer										
Number	859	595	21	34	51	37	2	137	723	63	576	517	342

## Other Relevant Statistics specific to SLC

## <u>Hiring</u>

There are currently approximately 859 employees at SLC (not including JTPA participants). There are 595 employees in competitive positions. Civil Service Law governs the hiring process for all Competitive class positions. Competitive class positions are filled according to merit. Merit is determined by competitive examination. Candidates are hired based on the "Rule of Three" which means appointing authorities are provided a certified list of candidate to hire from. The certified list includes the 3 highest scoring candidates, and all candidates whose final score equals the score of the candidate ranked number 3, willing to accept the position. This process doesn't allow for discrimination.

There are 21 employees in elected positions. The election process does not allow for discrimination.

Only 28% of the positions at SLC would be susceptible to discriminatory practices in the hiring process. Human Resources reviews all applications to ascertain qualifications of candidates. All interviews for these positions are tightly controlled using a specific set of questions for all candidates for a specific position. Notes on candidates by interviewers are kept for review. There have not been any discrimination claims in the hiring process for calendar year 2021.

## Compensation

Out of 856 employees 723 are union members. Pay is determined by union contracts with the majority of union employees required to start at base rate. Unions that allow new hires to start above base rate are started on the step that coincides with the number of years of experience that new hire has in that type of position with one year experience corresponding with one step to be determined by Human Resources. There are currently 723 bargaining unit members/employees and 614 must start at base rate. Pay for most non-union positions are based on a set salary band schedule. Employees in these positions may start above base as determined by the number of

years of experience the candidate has with one year experience equal to one step. The step placement is determine by Human Resources. The top 2% highest paid employees in 2021 include 9 males and 7 females. There does not appear to be any discrimination in the compensation process and there were no claims in calendar year 2021.

#### **Promotions**

Promotions in competitive positions are filled according to merit determined by competitive examination. This process also doesn't allow for discrimination. Promotions in the Highway Department are determined based on Union contract language and a specific calculation. There does not appear to be any discrimination in the promotion processes.

#### <u>Sex</u>

SLC currently employs 517 females and 342 males. Out of 24 Department Heads 10 are female. These figures do not indicate sexual discrimination in the promotion or hiring process. There were 3 sexual harassment related claims made in 2021. All were thoroughly investigated, re-training was given, and all were unfounded.

#### Age

Out of 859 employees, 576 employees are 40 years of age or older. Employees 40 years of age or older make up 21 of the 24 Department Heads. These figures do not indicate age discrimination in the hiring process.

#### **Reduction in Workforce**

There was no reduction in the workforce in calendar year 2021.

#### **Training and Education**

Currently training is provided to all Department Heads and Supervisors. The training is coordinated through HR or HR provides the training. A Tuition Reimbursement Policy is being developed which will allow for all employees to participate. Criteria will be established and a process put in place which will be available to all employees. Each year a review of employees that took advantage of this program will be done to determine unintentional discrimination practices.

#### **Recruitment**

Currently recruitment for positions is done on the County Website, and regional newspapers. More effort needs to go into finding sources which can reach minority groups. In an effort to diversify, we do reach out to the four area Colleges/Universities for positions that correspond with specific degree programs. In March of 2022 we implementing indexing with the NYS Department of Labor (DOL) Job Bank which enables automatic posting of SLC website postings to the DOL Job Bank. The DOL Job Bank can reach a more diverse populations.

#### Retaliation/Religion/ADA Accommodations

In calendar year 2021 there were 10 disability accommodation requests made. There were no retaliation claims or religious accommodations filed. We also comply with New York State (NYS) Civil Service Law, Section 55A which provides candidates with disabilities job opportunities. The purpose of NYS Civil Service Law, Section 55(a), is to provide disabled individuals with access to entry-level positions

without having to compete in a written examination. In 2021 we had 6 employees that were employed under Section 55(a). The titles eligible for a 55A appointment include:

Account Clerk Account Clerk - Typist Assistant Civil Engineer Audio - Visual Aide **Billing Clerk** Case Manager Caseworker Chemical Dependency Case Aide Chemical Dependency Counselor **Civil Enforcement Officer** Clerk Code Enforcement Officer Community Service Worker Computer Operator Computer Programmer/Analyst Computer Technician **Conservation District Technician** Custodian Data Entry Machine Operator **Delivery** Clerk **Dispatcher - Emergency Services** Electric Meter Reader **Employment and Training Counselor** Fire Driver - Fire Fighter Fire Vehicle Driver Index Clerk Insurance Clerk Intake Counselor **Keyboard Specialist** 

Library Clerk Medical Clerk - Typist Medical Records Clerk Mental Health Counselor Micro-Computer Operator Motor Vehicle Clerk Office for the Aging Programs Coordinator Phlebotomist Trainee Planner I **Police** Dispatcher Probation Assistant **Probation Officer** Purchasing Clerk Real Property Tax Service Aide Resident Services Coordinator Social Welfare Examiner Social Welfare Investigator/Examiner Stores Clerk Support Investigator Tax Map Technician **Tenant Relations Assistant** Typesetting Computer Operator Ward Clerk Water Meter Reader Water and Wastewater Treatment Plant Operator Trainee Weights and Measures Inspector

## PART X GOALS/ONGOING INITIATIVES ACTION ORIENTED PROGRAMS

The goals of the St. Lawrence County (SLC) Affirmative Action/Equal Employment Opportunity Plan integrate considerations into the routine personnel operations of SLC. These considerations are fluid, voluntary, good faith objectives designed to foster diversity and inclusion in accordance with the County values and organizational mission, applicable New York State and Federal Law, and existing personnel policies and practices. The highlights of the established goals and ongoing practices include but are not limited to:

#### A. Policy and Procedures

- □ Provide all applicants and employees who have a disability an equal opportunity in competing, obtaining and retaining employment.
- □ Ensure compliance with County policy and applicable disability rights law.
- $\Box$  Revise policies where appropriate
- □ Provide employment benefit information to all employees.
- □ Ensure an Equal Opportunity Employer statement is on examination announcements, employment application and in advertisings.

□ Ensure the SLC Discrimination Complaint Procedures is on the Human Resources website under: Affirmative Action/EEO Plan.

- □ Ensure benefits and compensation, personnel practices and procedures, training and other employment practices are non-discriminatory and are in compliance with current legal and regulatory requirements.
- □ Engage in an interactive process with any employee or applicant requesting an accommodation in order to determine an appropriate accommodation for their disability as defined by Federal or New York State law.

#### **B.** Recruiting/Promotional Opportunities

- □ Ensure Job Postings and Civil Service Exam announcements are distributed to all County Departments, SLC public agencies, and are also available on the SLC County website.
- □ Encourage individual departments to participate in career information programs within the community and to consider alternative recruitment sources for the purpose of reaching a diverse group of applicants.
- □ Provide a tuition assistance program to SLC County employees for their continuing education in an effort to increase the opportunity for upward mobility.

- □ Ensure career ladders are in place within Civil Service Law that permits the movement of capable lower level employees to higher classes through demonstrated merit and fitness. The elimination of unnecessary barriers in the form of non-related qualification requirements for the higher level classes is reviewed by the Classification section within the Human Resources Department.
- □ Provide trainees and paraprofessional positions with minimum qualifications commensurate with duties and responsibilities for employee development purposes.
- □ Utilize Civil Service Law Section 52 in Exams, when applicable, to allow employees who have held the position for at least two years in the non-competitive class the opportunity to compete in promotional examinations.
- □ Utilize Civil Service Law Section 55, when appropriate, to support applicants with disabilities in testing and interviewing for SLC County employment.
- □ Partner with One Stop Career Center which is located in the St. Lawrence County Human Services building and provides economic vitality of our county by building and maintaining a quality workforce development system that strengthens and provides economic, educational, and developmental opportunities for all citizens and employers.
- □ Provide additional credits on examinations can be awarded to successful candidates who have established veteran status in accordance with Civil Service Law.
- □ Ensure seniority credits are added to the scores of passing candidates in accordance with Civil Service Law for promotional exams.
- □ Partner with SLC Veterans Service Department which is a dedicated County resource for assisting Veterans in education and employment opportunities.
- □ Utilize intern and trainee programs to increase the County's efforts to build a diverse workforce of knowledge, skills and abilities.
- □ The physical and mental job qualifications identified for all County jobs are governed by the provisions of New York State Civil Service law. Review qualifications to ensure job qualification requirements are job-related and consistent with County necessity and safety.

#### C. Staff Development/Employee Relations

- Provide SLC Leadership a training day each year to improve management skills. Affirmative Action/EEO, Diversity and Inclusion, Sexual Harassment, Hostile Work Environment and Workplace Violence, and Ethics are among the topics provided.
- □ Provide SLC Department Heads with a leadership track education series each year through a program such as "ThinkHR" comprised of practical courses designed to increase supervisory awareness of their expectation, roles and responsibilities.
- □ Provide formal and informal dispute resolution for SLC employees by the Human Resources on an as needed basis.

- □ Investigate formal complaints of discrimination in a timely manner and responds with findings or recommendations within the timeframe prescribed in the County complaint procedure.
- □ Review information from exit interviews on an ongoing basis to improve retention.
- □ Increase job satisfaction and aid retention by providing transfer opportunities within the County departments.

All of the goals have been reviewed and continue to be complied with on an ongoing basis.

Jour Darathy

Jonnie J. Dorothy, AA/EEO Officer

04.06.2022 Date