

# EATON COUNTY



## Diversity & Inclusion Plan

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# **DIVERSITY & INCLUSION STATEMENT EATON COUNTY MICHIGAN**

Eaton County reaffirms its policy to ensure fair and equal treatment in all of its programs and provide equal employment opportunity (EEO) to all persons regardless of age, color, national origin, citizenship status, physical or mental disability, race, religion, creed, gender, sex, sexual orientation, gender identity and/or expression, genetic information, marital status, status with regard to public assistance, veteran status or any other characteristic protected by federal, state or local law. In addition, Eaton County will provide reasonable accommodations for qualified individuals with disabilities.

To carry out this responsibility, we will:

1. Recruit, hire, provide professional training and development, and promote for all job classifications without regard to race, color, veteran status, creed, sex, marital status, religion, age, national origin, political affiliation, or any other characteristic protected by federal, state or local law.
2. Make hiring and promotion decisions based solely on an individual's qualifications for the position to which they have applied and are considered.
3. Ensure that our programs are administered in compliance with all applicable federal, state and local laws, directives and regulations and cover all human resource actions including employment, compensation, benefits, training, education, tuition aid, transfers, promotions and social/recreational programs without regard to the protected characteristics listed above.

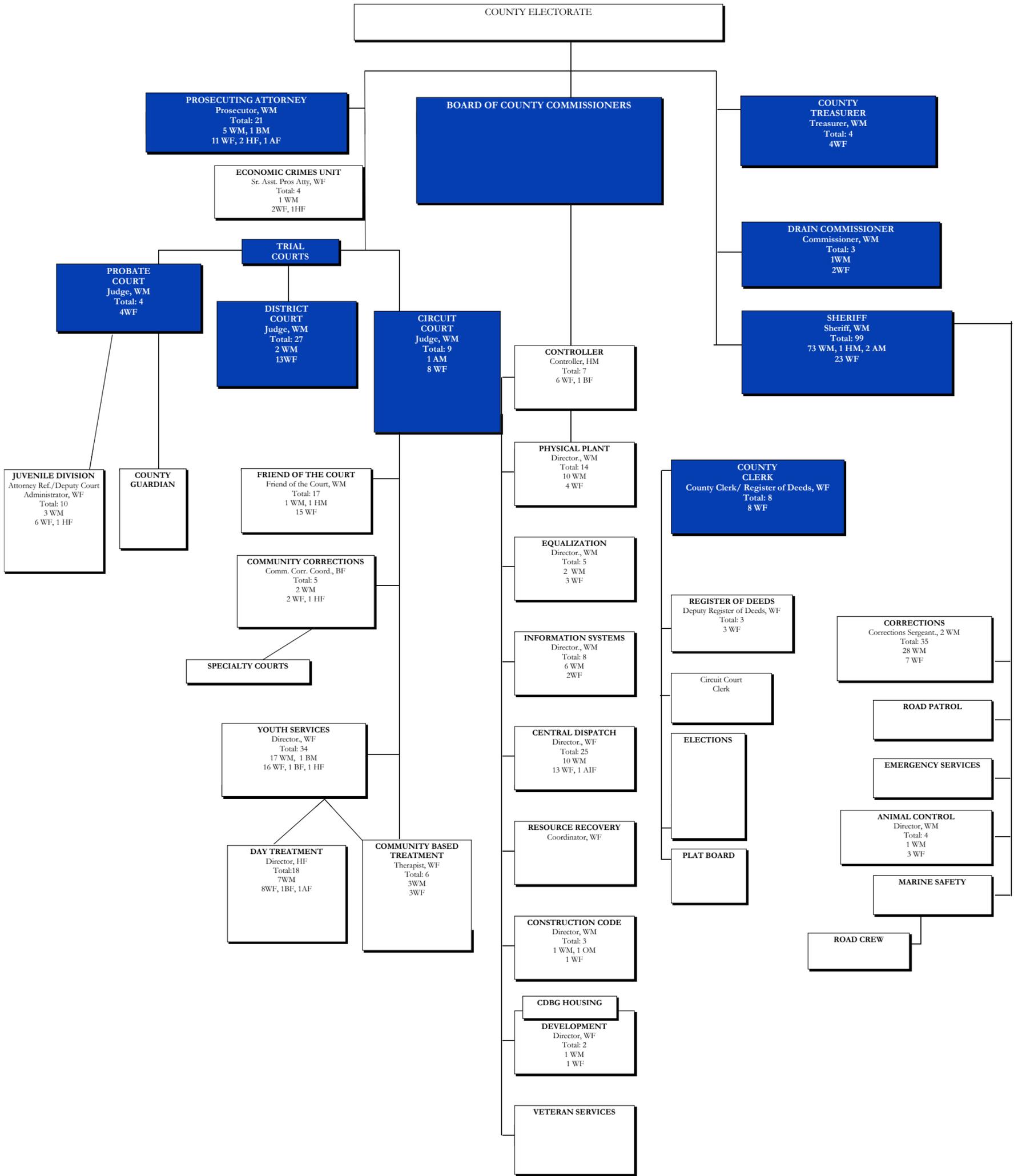
The Eaton County Board of Commissioners has designated the Ways and Means Committee and the County Controller to monitor and review the effectiveness of this plan. This includes regular review of diversity & inclusion reports, progress benchmarking, policy reinforcement, and requiring department heads to support the continuation of the County's policy by selecting qualified individuals on the basis of merit.



**Blake Mulder**  
Chairman, Eaton County Board of Commissioners

Organizational Display

EATON COUNTY



ELECTED OFFICIALS IN BLUE

## Identification of Problem Areas

<i>Areas of Concern</i>	<i>Corrective Actions</i>
<ul style="list-style-type: none"> <li>Underutilization of racial/ethnic minorities and women in all EEO categories where external hiring opportunities occurred. Concern regarding low applicant flow resulting from population demographics and salaries.</li> </ul>	<ul style="list-style-type: none"> <li>Utilize additional recruiting outlets and resources when possible, such as online job boards, advertisements, and professional organizations to attract qualified minorities, women and otherwise protected individuals to apply for job openings.</li> <li>Expand Eaton County's recruitment program to include colleges and universities with diverse student populations. In addition, the County will evaluate all positions and complete a salary study for potential wage increases in an effort to attract talent.</li> </ul>
<ul style="list-style-type: none"> <li>Underutilization of data regarding disabled and veteran employees. Concern regarding limited documentation resulting from a lack of internal tracking processes in this area.</li> </ul>	<ul style="list-style-type: none"> <li>Invite employees who qualify for these protected classes to self-identify by distributing the "Invitation to Self-Identify" statement enclosed in this document to current employees and new hires.</li> </ul>

## **Policy Statement - Equal Employment Opportunity for Protected Applicants and Employees**

Eaton County provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, disability or genetics. In addition to federal law requirements, Eaton County complies with applicable state and local laws governing nondiscrimination in employment in every location in which the County has facilities. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training at all levels of employment.

It is also the policy of Eaton County action to employ and to advance in employment, all qualified persons regardless of their status, and to base all employment decisions only on valid job requirements. The County's goal is to attract, develop and retain the best and brightest from all walks of life and backgrounds. This requires an organization to have a culture of inclusion, where all individuals feel respected, are treated fairly, and an opportunity to excel in their chosen careers whenever possible.

Employees and applicants of Eaton County will not be subject to harassment on the basis of disability or status as a protected veteran. Additionally, retaliation, including intimidation, threats, or coercion, because an employee or applicant has objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding individuals with disabilities or protected veterans is prohibited.

## **Personnel Process Review**

Eaton County focuses on the continuous improvement of personnel policies and processes to determine whether its present procedures assures careful, thorough and systematic consideration of the qualifications of employees and applicants who belong to EEO protected classes. The County will modify personnel processes when necessary based on this review, and will include the development of new procedures in this Diversity & Inclusion Plan, with the approval of the Eaton County Board of Commissioners, to ensure equal employment opportunity.

## **Review of Physical and Mental Job Qualification Standards**

The qualifications of all jobs, including physical and mental qualifications, were reviewed during calendar year 2014 to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified that are likely to have a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

Eaton County will continue to review physical and mental job qualification requirements whenever a job is vacated and the County intends to fill it through either hiring or promotion and will conduct a qualifications review whenever job duties change.

If at any time in the future, Eaton County should inquire into an employee's physical or mental condition or should conduct a medical examination, Eaton County affirms that such inquiries or exams will be conducted in accordance with ADA regulations and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for within the law's regulations. The results of the examination or inquiry will only be used in accordance with ADA requirements.

## **Reasonable Accommodation to Limitations Due to Disability**

Eaton County commits to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities, qualified disabled veterans, unless such accommodation would impose an undue hardship on the conduct of its business. Eaton County also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation would cause significant difficulty or expense, as outlined in the Americans with Disabilities Act.

## **Action-Oriented Programs**

Eaton County has instituted action programs to eliminate identified problem areas and to help support diversity and inclusion. These programs include:

1. Conducting analysis of job descriptions to ensure they accurately reflect job functions;
2. Reviewing job descriptions by department and job title using job performance criteria;
3. Making job descriptions available to recruiting sources and available all elected officials members of management and supervisory staff involved in the recruiting, screening, selection, and promotion processes
4. Evaluating the total selection process to ensure freedom from bias through:
  - a. Reviewing job applications and other pre-employment forms to ensure information requested is job-related
  - b. Training Elected Officials, members of management and supervisory staff on proper interview techniques
  - c. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity
  - d. Training in EEO for elected officials, management and supervisory staff
5. Using techniques to improve recruitment and increase the flow of minority, female, and all other protected applicants. Eaton County presently undertakes the following actions:
  - a. Include "Equal Opportunity Employer" statement in all printed employment advertisements;
  - b. Place job postings, when appropriate, in local media and job placement outlets that appeal to minority, women, and all other protected applicants.
  - c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;

6. Hiring a compensation consultant to help Eaton County perform a self-audit of its compensation practices; and
7. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
  - a. Posting promotional opportunities;
  - b. Evaluating job requirements for promotion.

## **Recruitment Resources**

Eaton County aims to recruit qualified individuals in an effort to create a talented workforce from all segments of society. Doing so requires designing outreach and recruitment strategies to draw from underrepresented sectors of the population and developing strategic partnerships with a variety of organizations to build a diverse applicant pool. The County utilizes the following outlets to promote employment opportunities, and will review their effectiveness as a part of its annual audit and reporting process:

### **Job Boards**

- NEOGOV
- Career Builder
- Pure Michigan Talent Connect
- Police Career Finder
- Dice.com
- PoliceOne.com

### **Professional Organizations**

- State Bar of Michigan
- Michigan Commission on Law Enforcement Standards
- Michigan Association of Chiefs of Police
- Michigan Association of County Drain Commissioners
- Michigan State Court Administrative Office
- Michigan Society of Professional Engineers

### **Colleges and Universities**

- Michigan State University – College of Law, Department of Forestry, College of Business, School of Information Technology
- Olivet College
- University of Detroit Mercy School of Law
- Thomas M. Cooley School of Law
- The University of Michigan Law School
- Michigan Technological University
- ITT Technical Institute
- Lansing Community College

### **Job Fairs**

- Michigan Virtual Career Fair
- Olivet College Fall Career Fair
- Oakland Community College Fall/ Spring Career Fair
- Lansing Community College Fall/Spring Career Fair
- Eastern Michigan University Collegiate Job Fair
- ITT Technical Institute Swartz Creek Career Fair

## **Selection Process**

In order to increase efficiency and diversity in hiring and retention, and to ensure EEO compliance, Eaton County uses consistency in its recruitment and selection process. The County encourages candidates from all segments of society to apply to any vacancy for which they are qualified. Doing so provides equal access to employment opportunities and prohibits discrimination based on race, gender, color, national origin, citizenship status, religion, physical or mental ability, ancestry, marital status, age, sexual orientation, status as a covered veteran and all other protected characteristics.

All applications submitted to an available opening will be reviewed by the Eaton County Controller's Office after the position closes. Applicants whose backgrounds appear to most closely match the needs of the particular vacancies will be forwarded to the hiring manager for further consideration.

Due to the extremely large number of applicants and the limited number of job opportunities, a number of candidates do not proceed to the interview phase. Only the most competitive applicants for a particular vacancy will be interviewed by a representative from the Controller's Office and the hiring department as needed. A final selection will be made following the formal interview process and an offer of employment will be extended on behalf of the County.

Offers of employment are contingent upon successful completion of pre-employment requirements and background verification.

## **Harassment Prevention and Prohibition Against Retaliation**

Employees and applicants of Eaton County will not be subject to harassment because of their protected status. Strong disciplinary action up to and including discharge will be taken against any employee who engages in illegal harassment. If an employee or applicant believes that he/she has been subject to harassment, they may file a written complaint with the Controller's office. Any employee or applicant who believes that they have been subject to harassment because they identify as disabled, veteran or qualify for any otherwise protected status should contact the Eaton County Controller at (517) 543-2122 for assistance.

Retaliation, including intimidation, threat, or coercion, against an employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding protected individuals. Any employee or applicant who believes that they have been subject to retaliation because they are disabled, a veteran or qualify for any otherwise protected status should contact the Eaton County Controller at (517) 543-2122 for assistance.

## **Dissemination of Policy, Outreach and Positive Recruitment**

Copies of our this plan will be made available for inspection to the Eaton County Board of Commissioners to promote understanding, acceptance and support. Policies are re-emphasized to elected officials, managers and supervisory staff annually to review the applicable regulations and to discuss such diversity & inclusion measures such as training and reasonable accommodation.

Eaton County lists all suitable employment openings with the appropriate employment service delivery systems, such as colleges and universities, professional associations, and employment websites whenever possible.

Eaton County will participate in local job fairs sponsored by support groups for protected individuals.

The equal employment opportunity clause concerning the employment of qualified individuals is displayed on all Eaton County job postings.

When making internal Equal Opportunity audits, implementation of this diversity & inclusion program will be reviewed.

## **Audit and Reporting Systems**

The Human Resources Specialist, under the direction of the County Controller and Deputy Controller is responsible for developing and preparing the formal documents of the Diversity & Inclusion Plan. The Controller and Deputy Controller are responsible for the effective implementation of this plan; however, responsibility is likewise vested with each elected official, members of management and supervisory staff. Eaton County's audit and reporting system is designed to:

- Measure the effectiveness of the Diversity & Inclusion Plan;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which the County's diversity has been obtained.

The following activities are reviewed at least annually to ensure freedom from discrimination or stereotyping of protected individuals in any manner, including that which may limit their access to any job for which they are qualified:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, award of tenure, layoff, recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, and job descriptions
- Sick leave, leaves or absence, or any other leave;
- Training, apprenticeships, attendance at professional meetings and conferences; and
- Any other term, condition, or privilege of employment.

Eaton County's audit system includes a report documenting the County's efforts to comply with its EEO responsibilities. Elected officials, members of management and supervisory staff are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the Elected Official, manager or supervisor is to report problem areas immediately to the Controller or Deputy Controller.

During annual reporting, the following occurs:

1. The Human Resources Specialist will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the County Controller and Deputy Controller; and
2. The Human Resources Specialist will report the status of the County's Diversity & Inclusion progress to the Controller and Deputy Controller.

Eaton County's audit system includes documenting Eaton County's efforts to achieve its EEO responsibilities. Elected officials, managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the Eaton County Controller or Deputy Controller. During reporting, the following occurs:

1. The Eaton County Controller and/or Deputy Controller will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the Board of Commissioners; and
2. The Controller will report the status of the Diversity & Inclusion Plan to the Board of Commissioners. The Controller will recommend remedial actions for the effective implementation of the Diversity & Inclusion Plan.

## **Invitation to Self-Identify**

Eaton County is dedicated to creating a diverse workforce and aims to employ and advance in employment qualified protected individuals whenever possible.

All applicants and employees who self-identify as having disabled, veteran, or otherwise protected status are encouraged to notify the Controller's Office of their protected status on their employment application or at any point during the hiring or employment process so that they may be included in our Diversity & Inclusion Plan.

This information will assist us in placing protected individuals in the appropriate position and in making any necessary accommodations. Qualified individuals with a disability are encouraged to tell us about any needed accommodations that would enable them to perform the essential functions of a job they have applied to or possess, including special equipment, changes in the physical layout of the job, elimination of marginal job duties, provision of personal assistance services or other accommodations.

Submission of this information is voluntary and refusal to provide it will not subject applicants or employees to any adverse treatment. The information provided will be used only in ways that are not inconsistent with EEO Laws.

Information submitted about a disability or protected characteristic will be kept confidential, except that (i) elected officials, supervisors and managers may be informed regarding restrictions on the work or duties of qualified individuals with disabilities, and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment; and (iii) government officials engaged in enforcing laws administered by OFCCP or the Americans with Disabilities Act, as amended, may be informed.

## **Responsibility for Implementation of Diversity & Inclusion Plan**

### **Responsibilities of the Equal Employment Opportunity Manager**

In furtherance Eaton County's commitment to diversity and Equal Employment Opportunity for individuals with disabilities and protected veterans, the Eaton County Controller and Deputy Controller are responsible for designing and ensuring effective implementation of the County's Diversity & Inclusion Plan. These responsibilities include, but are not limited to:

1. The development of the plan for protected individuals including those with disabilities and protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with diversity & inclusion obligations;
3. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a non-discriminatory manner when hiring, promotion, transfer and termination actions occur;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
6. Keeping the Board informed of equal opportunity progress and problems within the company through quarterly reports;
7. Providing elected officials, managers, and supervisory staff with a copy of this plan and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the County's Diversity & Inclusion Plan for protected classes including individuals with disabilities and protected veterans with all elected officials, managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Auditing the contents of Diversity & Inclusion Plan annually to ensure that compliance information is up-to-date;

10. Serving as liaison between Eaton County and enforcement agencies; and
11. Serving as liaison between Eaton County and organizations for protected individuals, including those with disabilities and protected veterans.

## **Responsibilities of Elected Officials, Managers and Supervisors**

Elected Officials, managers and supervisors are advised annually of their responsibilities under the County's Diversity & Inclusion Plan for individuals with disabilities and protected veterans and of their obligations to:

1. Review the County's Diversity & Inclusion policy for all protected classes including individuals with disabilities and protected veterans with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
3. Review the qualifications of applicants and employees to ensure qualified individuals are treated in a non-discriminatory manner when hire, promotion, transfer, and termination actions occur; and
4. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.