

# Equal Employment Opportunity Seven Step EEO Plan Guide

## WHAT IS AN EEO PLAN?

The purpose of an Equal Employment Opportunity (EEO) Plan is to insure full and equal participation of men and women regardless of race or national origin in the workforce. The County EEO Plan requires all County departments to maintain an EEO Plan for review by the Equal Opportunity Commission (EOC) and Equal Employment Opportunity (EEO) Office. The reason for developing your own departmental plan is to allow you to identify workforce disparities that are specific to your department. Consequently, you may have to undertake corrective actions that are also specific to your department in an effort to fulfill the overall objective of achieving staff diversity pursuant to the County's EEO Plan.

An EEO Plan is a comprehensive document that analyzes your department's workforce in comparison to relevant labor market data and all your employment practices to determine the impact on the diversity of your department. An EEO Plan includes:

- an introduction
- a statistical profile of the internal workforce
- community labor statistics
- a utilization analysis
- objectives
- steps to achieve the objectives
- dissemination of the EEO Plan

## COMPLETING AN EEO PLAN

### STEP 1. INTRODUCTION

The introduction to the plan should contain basic information about your department, its overall mission, as well as, an overview of its management operations. Basic information should include the name, addresses, and phone numbers of your various divisions and management personnel. Most importantly, the introduction should state your department's policy, as well as, the effective date and duration of the plan (which must reflect the time period and be signed into effect by the department head). The management operation overview should include a brief summary of the on-going departmental efforts, progress in meeting EEO objectives, and the current status of departmental EEO efforts, such as EEO Committees/Representatives, internal policies or complaint procedures, etc.

### STEP 2. WORKFORCE ANALYSIS

The EEO Office will provide you with the statistical information of your department's current workforce broken down by race, sex, national origin, and job classification.

### STEP 3. COMMUNITY LABOR STATISTICS

The EEO Office will provide you with the Community Labor Statistics (CLS) broken down by race, sex, national origin, and job classification as needed. The data you receive is a statistical summary of the labor market in San Bernardino and Riverside Counties, which represents the hiring pool.

### STEP 4. UTILIZATION ANALYSIS

1. CHARTS: The EEO Office will provide you a chart comparing your current workforce with the CLS in order to help you determine if and where there is under-utilization. This utilization analysis forms the basis of the plan and was obtained by comparing the information presented in Step 2. with the data in Step 3. Based on this information, you should be able to formulate your objectives for the next step.

## **Equal Employment Opportunity Seven Step EEO Plan Guide**

2. **NARRATIVE - Determining Factors Responsible for Under-utilization:** The second part of the utilization analysis is a narrative. In this section, you will interpret the utilization analysis, pointing out areas that are of concern, e.g., "This department demonstrates an under-utilization of Asian American men in the Executive job level, as their representation in the community workforce at that job level is 15%, while at our agency, it is 2%."

To determine factors responsible for any under-utilization, it may be necessary to evaluate your department's procedures in regards to recruitment, application, testing, termination, disciplinary action and promotion. For example, if your department's under-utilization analysis reflects that Blacks or women are underrepresented in all job levels, it demonstrates that your department may not be hiring these individuals in a manner that would reasonably be expected given their representation in the labor force. In order to determine what steps would best rectify this situation, your department should also scrutinize its past recruitment efforts and hiring practices. Perhaps women have not been targeted for recruitment, thus are not applying to the degree that men are. On the other hand, it is possible that women are applying in large numbers, but are disproportionately rejected for employment. It may be that the required entry-level examination puts women at a disadvantage or is screening out female candidates.

### **STEP 5. OBJECTIVES**

You will address the under-utilization identified in Step 4. by setting forth an objective to address such under-utilization. This objective must be specific and must be based on the results of the under-utilization analysis. For example, an objective that states, "it is our ambition to have a workforce that is more representative of the community" is too general. A better type of objective would be one that states, "because African American women are underrepresented in the higher levels of our organization in such jobs as Comptroller and Agency Administrator, it is our objective to increase this representation by evaluating our promotional practices to ensure that African American women are receiving equal opportunity to advance." Objectives should be reasonably attainable and based on a realistic timetable. The Human Resources Analyst assigned to your group/department should be advised of any underutilized protected classes and should be involved in coordinated efforts to target and recruit groups identified as being underutilized.

### **STEP 6. STEPS TO ACHIEVE OBJECTIVES**

The department must then set forth whatever steps it has determined will enable it to meet its objectives. The most effective steps will be those which directly address the reasons for any under-utilization of protected classes. The Human Resources Analyst should attempt to assist departments in identifying the factors that put protected classes at a disadvantage in your department. It may become necessary to evaluate applicant flow data, recruitment schedules, and the examination process, in order to identify factors that may be disproportionately eliminating protected classes. Once the causes for under-utilization have been identified, in a coordinated effort, the department and Human Resources can present the best steps for addressing any inequities. Specific organizations and publications can be contacted for recruitment, examinations can be revised; and requirements that do not pertain to job performance must be eliminated. The department may wish to offer training opportunities that will better prepare protected classes for entry-level and promotional examinations.

### **STEP 7. DISSEMINATION**

Finally, the department will describe what efforts it will take to disseminate their plan to all personnel within the department. These dissemination efforts shall include the name of the person(s) designated to implement the EEO Plan in your department.