

# CITY OF FRANKLIN

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## EQUAL EMPLOYMENT OPPORTUNITY PLAN

### SHORT FORM

**OCTOBER 2009 – SEPTEMBER 2011**

Prepared by: Carolyn Joyner, Human Resources Manager  
Department of Human Resources  
R. Bruce Edwards, Deputy Chief  
Franklin Police Department

# Introductory Information

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<b>Grant Title:</b>	<b>FY09 Byrne JAG Local Solicitation</b>	<b>Grant Number: 2009-SB-B9-2556</b>
<b>Grantee</b>	<b>Name: City of Franklin</b>	<b>Award Amount: \$35,514.00</b>
<b>Grantee</b>	<b>Type: Local Government Agency</b>	
<b>Address:</b>	<b>207 West Second Ave</b> <b>Franklin, Virginia 23851</b>	
<b>Contact Person:</b>	<b>R. Bruce Edwards</b>	<b>Telephone #: 757-562-8695</b>
<b>Contact Address:</b>	<b>1018 Pretlow St</b> <b>Franklin, Virginia 23851</b>	
<b>DOJ Grant Manager:</b>	<b>Kaqreem Izlar-Mathis DOJ</b>	<b>Telephone #: 202-514-2588</b>

# City of Franklin Policy Statement

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It is the policy of the City of Franklin that employment decisions shall be based on educational background, experience and demonstrated ability. Except where required or permitted by law, employment practices shall not be influenced or affected by virtue of an applicant's or employee's race, religion, sex, national origin, age, disability, or any other characteristic protected by law. In addition, it is the City's policy to provide an environment that is free of harassment of any kind, including that which is sexual, age-related, or ethnic. This policy governs all aspects of recruitment, employment, promotion, assignment; lay off, discharge, and other terms and conditions of employment.

The City of Franklin complies with the American Disability Act (ADA) which prohibits discrimination against a qualified individual with a disability on the basis of disability in the following employment practices:

- Recruitment, advertising, and job application procedures
- Hiring, upgrading, training, promotion, demotion, transfer, layoff, termination and rehiring.
- Rates of pay or any other form of compensation and changes in compensation.
- Job assignments, job classifications, position descriptions.
- Leaves of absence, sick leave, or any other leave
- Fringe benefits available by virtue of employment
- Selection and financial support for training
- Activities sponsored by the City including social and recreational programs.
- Any other term or condition of employment.

Special affirmative action shall be taken to ensure that any discriminatory practices that impede equal employment opportunity within the City government are identified and eliminated. Such discriminatory practices shall be changed in order to provide all persons with the opportunity to compete equally for jobs and promotions on the basis of ability and qualifications. Affirmative action efforts shall also be made by aggressive recruitment of minorities, women and individuals with disabilities with the goal of having a workforce that is representative of the relevant labor market area.

# Workforce Utilization Analysis

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The City's workforce utilization analysis displays combined data for the: 1) current workforce statistics (effective October 2009), 2) relevant labor market (RLM) for the City of Franklin and 3) areas of utilization reflected in gender and race/ethnic groups.

**Utilization Analysis Chart**  
**Relevant Labor Market: Franklin city, Virginia**

Job Categories	Male							Female						
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races
<b>Officials/Administrators</b>														
Workforce #/%	11/61%	0/0%	1/6%	0/0%	0/0%	0/0%	0/0%	4/22%	0/0%	2/11%	0/0%	0/0%	0/0%	0/0%
CLS #/%	140/49%	0/0%	25/9%	0/0%	0/0%	0/0%	0/0%	95/33%	0/0%	25/9%	0/0%	0/0%	0/0%	0/0%
Utilization #/%	12%	0%	-3%	0%	0%	0%	0%	-11%	0%	2%	0%	0%	0%	0%
<b>Professionals</b>														
Workforce #/%	2/8%	0/0%	2/8%	0/0%	0/0%	0/0%	0/0%	9/36%	0/0%	12/48%	0/0%	0/0%	0/0%	0/0%
CLS #/%	170/26%	0/0%	60/9%	0/0%	0/0%	0/0%	0/0%	275/43%	0/0%	140/22%	0/0%	0/0%	0/0%	0/0%
Utilization #/%	-18%	0%	-1%	0%	0%	0%	0%	-7%	0%	26%	0%	0%	0%	0%
<b>Technicians</b>														
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	15/21%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	45/64%	0/0%	10/14%	0/0%	0/0%	0/0%	0/0%
Utilization #/%														
<b>Protective Services: Sworn</b>														
Workforce #/%	32/76%	0/0%	5/12%	0/0%	0/0%	0/0%	0/0%	5/12%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
CLS #/%	40/28%	0/0%	40/28%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	65/45%	0/0%	0/0%	0/0%	0/0%
Utilization #/%	49%	0%	-16%	0%	0%	0%	0%	12%	0%	-45%	0%	0%	0%	0%
<b>Protective Services: Non-sworn</b>														
Workforce #/%	1/100%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
Civilian Labor Force #/%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	15/100%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
Utilization #/%	100%	0%	0%	0%	0%	0%	0%	-100%	0%	0%	0%	0%	0%	0%
<b>Administrative Support</b>														
Workforce #/%	5/14%	0/0%	1/3%	0/0%	0/0%	0/0%	0/0%	20/54%	0/0%	11/30%	0/0%	0/0%	0/0%	0/0%
CLS #/%	130/16%	0/0%	80/10%	0/0%	0/0%	0/0%	0/0%	290/36%	0/0%	295/37%	0/0%	4/1%	0/0%	0/0%
Utilization #/%	-3%	0%	-7%	0%	0%	0%	0%	18%	0%	-7%	0%	-1%	0%	0%
<b>Skilled Craft</b>														
Workforce #/%	13/50%	1/4%	11/42%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	1/4%	0/0%	0/0%	0/0%	0/0%
CLS #/%	205/53%	25/7%	130/34%	0/0%	0/0%	0/0%	0/0%	10/3%	4/1%	10/3%	0/0%	0/0%	0/0%	0/0%

Job Categories	Male							Female						
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races
Utilization #/%	-3%	-3%	8%	0%	0%	0%	0%	-3%	-1%	1%	0%	0%	0%	0%
<b>Service/Maintenance</b>														
Workforce #/%	4/13%	0/0%	23/77%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	3/10%	0/0%	0/0%	0/0%	0/0%
CLS #/%	315/24%	0/0%	400/31%	0/0%	0/0%	0/0%	0/0%	115/9%	0/0%	460/36%	0/0%	0/0%	0/0%	0/0%
Utilization #/%	-11%	0%	46%	0%	0%	0%	0%	-9%	0%	-26%	0%	0%	0%	0%

# Narrative Underutilization Analysis

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The City of Franklin Human Resources Office reviewed the Utilization Analysis (comparing the City's workforce to the relevant labor market), and noted the following:

1. White males were significantly under-represented in the following job categories:
  - a. Professionals (-18%)
  - b. Service and Maintenance (-11%)
2. White females were significantly under-represented in the following job categories:
  - a. Officials/ Administrators (-11%)
  - b. Professionals (-7%)
  - c. Protective Services Non- Sworn (-100%)
    - i. Only one position available
    - ii. Always be underutilized in one category or another
  - d. Service Maintenance (-9%)
3. Black males were significantly under-represented in the following job categories:
  - a. Protective Service Sworn (-16%)
    - i. Active recruitment of this category for past ten years
  - b. Administrative Support (-7%)
4. Black females were significantly under-represented in the following job categories:
  - a. Protective Services Sworn (-45%)
    - i. Active recruitment of this category for past ten years
  - b. Administrative Support (-7%)
  - c. Service Maintenance (-26%)

# Objectives and Steps

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Based on the utilization analysis, several areas indicate female and minority representation at levels less than the relevant labor market (RLM) indicates. The City is committed to addressing and improving overall female and minority representation in areas where underutilization exists. These areas are addressed through the implementation of department strategies such as diversity and inclusion initiatives, workforce planning and development initiatives and other measures in order to improve our profile.

In order to accomplish our objectives, the City implemented the following action steps which have become standard organizational processes and procedures:

- The phrase “The City of Franklin is an Equal Opportunity Employer (EOE)” is included in all recruitment literature and on the “career opportunities” page of the City’s website.
- Recruitment sources for individuals of protected classes are identified and updated annually by the Department of Human Resources.
- Minority publications, community groups/organizations, and media are used to publicize City employment opportunities if available.
- Employees are encouraged to refer qualified applicants of protected classes for City employment.
- The City participates in job fairs and recruitment at local high schools, minority colleges/universities and technical schools.
- Partnerships are formed with minority professional organizations and faith-based organizations.
- Job selection panels include representatives of protected classes.
- Job selection procedures are continually reviewed to ensure fair and unbiased entry-level placement opportunities.
- Promotional testing and assessment centers are reviewed to ensure fair and equitable testing for all candidates.
- Where possible, qualified applicants with disabilities are provided with reasonable accommodations to enable them to compete in testing and selection processes.
- New and existing positions are reviewed to ensure minimum requirements are set on the basis of the knowledge, skills, competencies, and abilities necessary to perform the job.
- Equal Employment Opportunity (EEO), Sexual Harassment and Diversity and Inclusion training is conducted for supervisory staff to include education and awareness of supervisor responsibilities in unlawful employment and harassment practices.
- EEO, Sexual Harassment and Diversity and Inclusion training is provided as part of new employee orientation and is available to all employees several times per year.

# EEOP Dissemination – Internal & External

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The following internal efforts are currently in place and will continue to be on-going in support of the dissemination of the City's EEOP and policies:

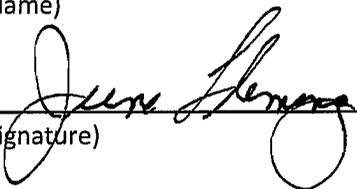
- EEO policies and procedures are explained during new employee orientation. Each new hire receives a copy of the City's EEO Policy and Sexual Harassment Policy.
- EEO training is available to all employees via the Human Resources Department. Specific training will also be provided at management's request. All EEO related training efforts incorporate discussions of the City's EEOP.
- Federal Equal Employment Opportunity Commission (EEOC) guidelines are posted on City bulletin boards.
- The EEOP is accessible to all City employees via the City's external ([franklinva.com](http://franklinva.com)) and internal web sites.

External dissemination of the City's EEOP and EEO policy shall continue and will include but not be limited to the following:

- The City's EEOP and EEO Policy are available to City of Franklin citizens and community groups through the internet web site [franklinva.com](http://franklinva.com)
- All advertisements of employment positions shall clearly state that the City of Franklin is an Equal Opportunity Employer (EOE).
- The Department of Human Resources will continue to notify special interest groups and organizations of the City's EEO Policy and encourage the referral of qualified applicants for advertised openings.
- The City will ensure that all purchase orders, leases and contracts covered by Executive Order 11246, as amended, incorporate a statement that the City of Franklin is an Equal Opportunity Employer (EOE) and that contractors are obligated to adhere to federal, state, and local laws regarding equal employment opportunity.

I understand the regulatory obligation under 28 C.F.R. 42.301-.308 to collect and maintain extensive employment data by race, national origin, and sex, even though our organization may not use all of this data in completing the EEO Short Form.

I have reviewed the foregoing EEO Short Form and certify the accuracy of the reported workforce data and our organization's employment policies.

<u>June Fleming</u>	<u>City Manager</u>	<u>October 1, 2009</u>
(Name)	(Title)	(Date)
<u></u>		
(Signature)		

**CERTIFICATION FORM**

Recipient Name and Address: City of Franklin

Grant Title: FY09 Byrne JAG Local Solicitation Grant Number: 2009-SB-B9-2556 Award Amount: \$35,514.00

Contact Person Name and Title: R. Bruce Edwards, Deputy Chief Phone Number: (757) 562-8695

Federal regulations require recipients of financial assistance from the Office of Justice Programs (OJP), its component agencies, and the Office of Community Oriented Policing Services (COPS) to prepare, maintain on file, submit to OJP for review, and implement an Equal Employment Opportunity Plan (EEO) in accordance with 28 C.F.R §§ 42.301-.308. The regulations exempt some recipients from all of the EEO requirements. Other recipients, according to the regulations, must prepare, maintain on file and implement an EEO, but they do not need to submit the EEO to OJP for review. Recipients that claim a complete exemption from the EEO requirement must complete **Section A** below. Recipients that claim the limited exemption from the submission requirement, must complete **Section B** below. **A recipient should complete either Section A or Section B, not both.** If a recipient receives multiple OJP or COPS grants, please complete a form for each grant, ensuring that any EEO recipient certifies as completed and on file (if applicable) has been prepared within two years of the latest grant. Please send the completed form(s) to the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice, 810 7<sup>th</sup> Street, N.W., Washington, D.C. 20531. For assistance in completing this form, please call (202)307-0690 or TTY (202) 307-2027.

**Section A- Declaration Claiming Complete Exemption from the EEO Requirement.** *Please check all the boxes that apply.*

- |  |   |
|--|---|
| <input type="checkbox"/> Recipient has less than 50 employees,   | <input type="checkbox"/> Recipient is an Indian tribe,                      |
| <input type="checkbox"/> Recipient is a non-profit organization, | <input type="checkbox"/> Recipient is an educational institution, or        |
| <input type="checkbox"/> Recipient is a medical institution,     | <input type="checkbox"/> Recipient is receiving an award less than \$25,000 |

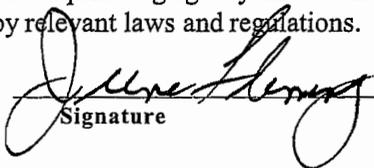
I, \_\_\_\_\_ [responsible official], certify that \_\_\_\_\_ [recipient] is not required to prepare an EEO for the reason(s) checked above, pursuant to 28 C.F.R §42.302. I further certify that \_\_\_\_\_ [recipient] will comply with applicable Federal civil rights laws that prohibit discrimination in employment and in the delivery of services.

_____	_____	_____
<b>Print or type Name and Title</b>	<b>Signature</b>	<b>Date</b>

**Section B- Declaration Claiming Exemption from the EEO Submission Requirement and Certifying That an EEO Is on File for Review.**

If a recipient agency has 50 or more employees and is receiving a single award or subaward for \$25,000 or more, but less than \$500,000, then the recipient agency does not have to submit an EEO to OJP for review as long as it certifies the following (42 C.F.R. § 42.305):

I, June Fleming, City Manager [responsible official], certify that the City of Franklin [recipient], which has 50 or more employees and is receiving a single award or subaward for \$25,000 or more, but less than \$500,000, has formulated an EEO in accordance with 28 CFR §42.301, *et seq.*, subpart E. I further certify that the EEO has been formulated and signed into effect within the past two years by the proper authority and that it is available for review. The EEO is on file in the office of: Human Resources [organization], at 207 West Second Ave, Franklin VA 23851 [address], for review by the public and employees or for review or audit by officials of the relevant state planning agency or the Office for Civil Rights, Office of Justice Programs, U. S. Department of Justice, as required by relevant laws and regulations.

<u>June Fleming, City Manager</u>		<u>10-01-2009</u>
<b>Print or type Name and Title</b>	<b>Signature</b>	<b>Date</b>

**CERTIFICATION FORM**

Recipient Name and Address: Franklin Police Department

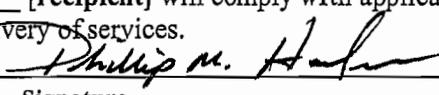
Grant Title: FY09 Byrne JAG Local Solicitation Grant Number: 2009-SB-B9-2556 Award Amount: \$35,514.00

Contact Person Name and Title: R. Bruce Edwards, Deputy Chief Phone Number: (757) 562-8695

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**Section A- Declaration Claiming Complete Exemption from the EEOP Requirement.** *Please check all the boxes that apply.*

- |                                     |   |                          |  |
|-------------------------------------|---|--------------------------|--|
| <input checked="" type="checkbox"/> | Recipient has less than 50 employees,   | <input type="checkbox"/> | Recipient is an Indian tribe,                      |
| <input type="checkbox"/>            | Recipient is a non-profit organization, | <input type="checkbox"/> | Recipient is an educational institution, or        |
| <input type="checkbox"/>            | Recipient is a medical institution,     | <input type="checkbox"/> | Recipient is receiving an award less than \$25,000 |

I, Phillip M. Hardison, Chief of Police [responsible official], certify that  
City of Franklin Police Department [recipient] is not required to  
prepare an EEOP for the reason(s) checked above, pursuant to 28 C.F.R §42.302. I further certify that the  
City of Franklin Police Department [recipient] will comply with applicable Federal civil rights  
laws that prohibit discrimination in employment and in the delivery of services.  
Phillip M. Hardison, Chief of Police  10-01-2009  
Print or type Name and Title Signature Date

**Section B- Declaration Claiming Exemption from the EEOP Submission Requirement and Certifying That an EEOP Is on File for Review.**

If a recipient agency has 50 or more employees and is receiving a single award or subaward for \$25,000 or more, but less than \$500,000, then the recipient agency does not have to submit an EEOP to OJP for review as long as it certifies the following (42 C.F.R. § 42.305):

I, \_\_\_\_\_ [responsible official], certify that  
the \_\_\_\_\_ [recipient], which has 50 or more  
employees and is receiving a single award or subaward for \$25,000 or more, but less than \$500,000, has formulated an  
EEOP in accordance with 28 CFR §42.301, *et seq.*, subpart E. I further certify that the EEOP has been formulated and  
signed into effect within the past two years by the proper authority and that it is available for review. The EEOP is on file in  
the office of: \_\_\_\_\_ [organization],  
at \_\_\_\_\_ [address], for review by the public and  
employees or for review or audit by officials of the relevant state planning agency or the Office for Civil Rights, Office of  
Justice Programs, U. S. Department of Justice, as required by relevant laws and regulations.

\_\_\_\_\_  
Print or type Name and Title Signature Date