

**ADMINISTRATIVE POLICY NO.: 2024-01**

**SUBJECT:** EQUAL EMPLOYMENT OPPORTUNITY PLAN

**DATE ISSUED:** March 14, 2024

**DATE EFFECTIVE:** March 14, 2024

**APPROVED:**   
Elizabeth Chamberlain, City Manager

**SECTION I: PURPOSE, STATEMENT OF POLICY AND AFFIRMATION:**

The City of Walla Walla is committed to the concept of equal employment opportunity as a necessary element of the basic merit principle. This commitment will be supported by positive, practical efforts to ensure equal employment opportunities for minorities, women, and those that may be employment disadvantaged. This commitment extends to all City employment opportunities including promotional opportunities for current City employees at all job levels and professional development and training opportunities. The existence of these guidelines however should not be construed as an admission either in whole or in part that the City of Walla Walla has engaged in any activity whereby minorities or women have been or are presently being underutilized, concentrated, or discriminated against in any way in violation of federal, state, or local fair employment practice laws.

The City will not discriminate in its human resource practices. Employment decisions, including hiring, promotions and training, will be made without regard race, color, national origin, age, disability, religion, veteran status, sexual orientation, gender identity, or sex unless based upon bona fide occupational qualification. The City will maintain non-segregated and non-discriminatory facilities. All personnel actions and programs including but not limited to compensation, benefits, transfers, layoffs, recalls, company-sponsored training, education, tuition assistance, and social and recreational programs will be administered in a nondiscriminatory manner with respect to minorities and women, provided the individual is qualified to perform the work available.

The use of goals and timetable by the Employer shall not discriminate against an individual, or group of individuals, with respect to any employment opportunity for which he, she, or they are qualified on the grounds that he, she, or they are not the beneficiaries of affirmative action themselves since the City of Walla Walla does not sanction the discriminatory treatment of any person. All targets which the City of Walla Walla has established shall not be considered rigid, inflexible quotas but rather reasonable objectives to be achieved in good faith.

This administrative policy document serves as a revision to the City of Walla Walla Equal Employment Opportunity Plan (hereinafter "the Plan") adopted in June 1975, revised in 2024, which is hereby repealed, and reaffirms the City's commitment to equal employment opportunity.

**SECTION II: OBJECTIVES OF EQUAL EMPLOYMENT OPPORTUNITY PLAN**

- A. To establish and maintain employment level benchmarks pursuant to U.S. Government guidelines as they may be issued by the Equal Employment Opportunity Commission, the Department of Justice, and the Office of Federal Contract Compliance Programs, for minorities, women, and those disadvantaged in employment. In general, these benchmarks are to achieve employment levels in relative proportion to the community labor statistics.
- B. To distribute this employment proportionately throughout job classes and departments in the City service.
- C. To make continuous effort to eliminate and/or prevent occurrence of discriminatory practices relating to employment or access to promotion within City service.

- D. To follow the merit principle outlined by Federal policy.

SECTION III. DISSEMINATION OF POLICY:

A. Internal

1. Training sessions for all supervisory personnel, including department directors, division managers and supervisors, will be conducted on a periodic basis.
2. Employees will be kept informed on items related to the implementation of the Plan through a variety of mediums, e.g., the Friday Feed (employee newsletter), email, City intranet and website, informational briefings, and Department, Division, and City-wide meetings.
3. The Plan will be posted on the City intranet/website and employee/work unit bulletin boards throughout the City. A copy of the City Utilization Chart and related Civilian Labor Statistics as required by the Federal government will be available upon request in the Human Resources Office.
4. EEO posters and the equal employment opportunity policy will be posted on bulletin boards (in English and Spanish, where appropriate) and will continue to be displayed in the future.
5. All new employees will be provided a copy of the Equal Employment Opportunity Plan as part of their orientation.
6. A copy of the Equal Employment Opportunity Plan will be provided to City commissions, boards, and committees.

B. External

1. Notification of this plan shall be distributed to a variety of community groups and agencies involved in labor market processes such as the Washington State Employment Security Department, Blue Mountain Action Council, the Walla Walla Chamber of Commerce, area colleges, Port of Walla Walla, etc.
2. Meetings with groups, agencies, and individuals will be held in response to requests for information and clarification.
3. All City job postings shall include the phrases "The City of Walla Walla complies with Title VI, ADA, and other applicable federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, religion, veteran status, sexual orientation, gender identity, or sex in employment or the provision of services. Equal Opportunity Employer / minorities and women are encouraged to apply."
4. When the City advertises in newspapers for prospective employees, the advertisement includes the EEO solicitation: "Equal Opportunity Employer" or "EOE".

SECTION IV. EQUAL EMPLOYMENT OPPORTUNITY PLAN

A. Top Level Support

1. This document commits all employees of the City of Walla Walla to support the City's Plan. The Plan reaffirms and implements the City's belief in this policy and provides for a definite commitment to policy implementation and maintenance.

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2. Implementation responsibility is hereby assigned to the staff through the City Manager. The City Manager will issue explicit Equal Employment Opportunity policies as necessary. The EEO Officer shall be the Human Resources Director. The EEO Officer shall provide for effective communication and enforcement of the requirements of this program and see that each department director complies with the intent of the City administrative policy. The program will be implemented pursuant to and consistent with current Federal, State, and local laws and applicable quasi-judicial requirements.
3. Department Directors, Managers, and Supervisors are required to make all employment recommendations, including but not limited to employment appointment selections, without regard to consideration based upon race, color, national origin, age, disability, religion, veteran status, sexual orientation, gender identity, or sex unless based upon bona fide occupational qualification(s). Further, all employment decisions will be based upon the Equal Employment Opportunity Plan objectives.
4. The EEO policy will be reflected in the Equal Employment Opportunity Policy, Reasonable Accommodation For Disabilities, Reasonable Accommodation For Religious Beliefs Or Practices, Procedure To Request Reasonable Accommodation, Life Threatening/Communicable Diseases, Policy Against Unlawful Retaliation, Unlawful Discrimination, Harassment, And Retaliation Complaint Procedure, Anti-Disruption Policy and Anti-Harassment Policy, which are included in the City's Personnel Policy Manual. Copies of the Personnel Policy Manual will be distributed to all current employees and to new employees when they are hired, publicized in other printed materials where appropriate, and will be accessible on the City's website.
5. The City of Walla Walla will demonstrate its commitment to the program by funding and otherwise seeing that the necessary elements of this Plan are implemented.

### B. Responsibility for Action

1. The Human Resources Director will be responsible for the implementation of the plan on a day-to-day basis.
2. Actions by supervisory personnel inconsistent with this policy will not be tolerated and may lead to corrective action up to and including termination of employment.

### C. Work Force Analysis/Benchmarks

1. A work force analysis will be performed by the Human Resources Department on an annual basis identifying each employee by sex, ethnicity, job category (class specification), and salary. "Job category" is defined by the Equal Employment Opportunity Commission for its required EEO-4 report.
2. Based upon such analysis and with an awareness of what the community labor market offers, benchmarks will be formulated and updated at least bi-annually via a City utilization rate analysis in conjunction with the Office of Federal Contract Compliance Programs (OFCCP). The time frame in which to achieve these benchmarks are dependent upon growth and the expansion of City services, the employment turnover rate of the City workforce, and revenues to support increased recruitment/placement opportunities.
3. Placement efforts will be concentrated in job categories and/or departments where the least number of minorities and/or females are employed, and in job classifications where vacancies occur.

### D. Recruitment

1. Outreach recruitment is essential to the Equal Employment Opportunity Plan. All segments of the immediate community must be made aware of job opportunities. Dependent upon the placement of the position in the organization, specialized qualifications, and degree of recruitment/placement difficulty, the recruitment efforts may be expanded to the surrounding region and beyond,

incorporating contacts with known groups having minority affiliation and association. The following recruitment techniques will be employed:

- a. Media patronized by minority group members.
  - b. Agencies whose specific concern is employment of disadvantaged persons, including minorities and women.
2. Job opportunity announcements will be circulated to all City departments and divisions to provide employees the opportunity to apply for positions for advancement.
  3. Given the significant Spanish-speaking population that resides in the City, as vacancies occur, the City's Human Resources Director will evaluate whether oral competence in the Spanish language is mandatory, preferred, or not a factor in the recruitment/selection process.

E. Valid Selection Devices

1. Examination and selection methods for all classifications are evaluated and revised on an on-going basis to be in compliance with recent Supreme Court decisions, State and Federal laws, regulations, and guidelines.
2. All parts of the selection process, from the submission of the application to the final interview for appointment must be:
  - a. Realistically and directly related to the actual duties to be performed on the job;
  - b. Designed to measure the person for the job and not the person in the abstract;
  - c. Free of arbitrariness and equal employment opportunity barriers; and
  - d. Free of discrimination and adverse effect.
3. Standardized selection practices are utilized for non-civil service jobs with department directors regularly advised and mentored with regard to the achievement of the equal employment opportunity benchmarks.

F. Job Restructuring/Training For Advancement

1. In preparation for filling vacancies, the class specification (job description) will be reviewed with the Department Director, Manager, and Supervisor to determine the feasibility of restructuring the position. The focus of each restructuring review will involve consideration of the following:
  - a. Creating a career ladder/trainee level below the usual entry-level which requires a lesser degree of qualifications, e.g., experience, education, certifications/license, etc.
  - b. Developing on-the-job training opportunities.
  - c. Providing for potential career ladder advancement through satisfactory completion of specific training and educational increments.
2. The feasibility for position restructuring will be given ongoing consideration given the need and funding resources available to the City/Department/Division.
3. The City's class specifications (job descriptions) are to be reviewed and revised on an on-going basis to:

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- a. Assure relatedness to job content.
  - b. Set job requirements and qualifications at the minimum level needed for entrance to the job.
  - c. Comply with Human Rights Commission and EEOC requirements.
4. To the extent feasible and within budgetary freedoms, promotions in the City work force will include planned training opportunities (on-the-job and formal classroom) to assist incumbents in reaching the journey-level for their respective classification, promote further advancement opportunities for employees, and encourage positive performance to ensure quality customer relations and the delivery of exceptional City services.

### G. Human Relations Training

1. Periodic opportunities will be provided for executive and management personnel to improve supervisory, human relations, and interpersonal communication skills.
2. All other employees shall receive a basic orientation to the subject matter and will be provided annual on-line training on Discrimination-Free Workplace and Sexual Harassment and Discrimination Prevention. Employees will also be encouraged to participate in other training and awareness events sponsored by the City and other organizations throughout the year.

### H. Contracting and Subcontracting City Work

All contractors and subcontractors of City work holding contracts of \$10,000 or more must certify to the City that they are equal opportunity employers.

### I. Progress Reporting

1. The Equal Employment Opportunity Plan will be evaluated and updated as the EEO-4 Report is prepared per the requirements of the U.S. Department of Justice Office of Civil Rights. At this time the City is required to complete the EEO-4 Report every other year during odd years.
2. Department Directors will submit a statistical report of progress to the City Manager via the Human Resources Director. This shall be accompanied by a narrative report presenting efforts applied toward meeting program objectives, explaining deviations from benchmarks, and stating remedial plans of action to eliminate any deficiencies. Information from these reports will be incorporated within the Equal Employment Opportunity Plan updates.

### J. Grievance Procedures

1. Present procedures for handling grievances as provided for by the City of Walla Walla Personnel Policy Manual are appropriate for dealing with allegations of discrimination and non-compliance with the City Equal Employment Opportunity Plan.
2. To insure that all aggrieved individuals are aware of these procedures, each employee is provided with a copy of the City of Walla Walla Personnel Policy Manual at the time of hire and will have access to updated versions on the City intranet.

### K. Lay-Off Procedure

Employee(s) may be laid off for lack of work or lack of funds. Any lay-off shall be in accordance with the City of Walla Walla Personnel Policy manual and applicable collective bargaining agreement procedures.

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Distribution: City Council  
Department Directors  
City Employees  
Post on City Website and Intranet

Original: Administrative Policy File