



I, Cheryl Seely, County Clerk for Crook County, Oregon, certify that the instrument identified herein was recorded in the Clerk records.

Cheryl Seely - County Clerk



IN THE COUNTY COURT OF THE STATE OF OREGON
FOR THE COUNTY OF CROOK

IN THE MATTER OF ADOPTING)
THE CROOK COUNTY EQUAL) ORDER NO. 2022-26
EMPLOYMENT OPPORTUNITY)
PLAN FOR 2022-2024)

WHEREAS, as part of its obligations under certain state and federal grants, Crook County must adopt an Equal Opportunity Employment Plan; and

WHEREAS, the requirements of the Equal Opportunity Employment Plan are prescribed by rules adopted by the U.S. Department of Justice; and

WHEREAS, Crook County is committed to furthering the goals of providing equal employment opportunities for its employees and its job applicants, now and in the future.

NOW, THEREFORE, the Crook County Court adopts the recitals above, and ORDERS and DIRECTS, based upon the above recitals, that the Equal Opportunity Employment Plan attached to this Order be adopted for the period of October 1, 2022 to September 30, 2024.

BE IT FURTHER ORDERED that County staff members are directed to take those steps necessary to promulgate the adopted plan as described under applicable law and the terms of the plan itself.

BE IT FURTHER ORDERED that County staff are directed to complete all necessary ancillary documentation as may be required under applicable law.

DATED this 6th day of July, 2022.

CROOK COUNTY COURT

Judge Seth Crawford

Jerry Brummer

Commissioner Jerry Brummer

Brian Barney

Commissioner Brian Barney

Crook County Equal Employment Opportunity Plan

Grant Title:	Multiple Grants
Grant Number:	Multiple Grants
Grantee Name:	Crook County
Award Amount:	Multiple Award Amounts
Address:	300 NE Third St.
Prineville, OR 97754	
Crook County Contact Person:	Kim Barber, Human Resources Director
Telephone Number:	(541) 416-3962
Date and Effective Duration of EEOP	October 1, 2022 to September 30, 2024

Equal Employment Opportunity Statement:

Crook County makes an affirmative acknowledgement that it adheres to the laws and principles of providing equal employment opportunities. Job and volunteer applications include the phrases "Equal Opportunity Employer" as does the County's human resources webpage. Further, the following statement is included on the second page of the Crook County employee handbook, which is made available to each new employee upon hiring and is periodically updated. The employee handbook is also posted on the County's website (available to the general public) as a word-searchable PDF document, which may be downloaded free of charge.

EQUAL EMPLOYMENT OPPORTUNITY:

It is the policy of Crook County to employ, retain, promote, discharge and otherwise assess all job applicants and employees on the basis of their merits, qualifications and competence. Crook County is an equal opportunity employer, and as such, we consider individuals for employment according to their abilities and performance. Employment decisions are made without regard to age, disability, race, color, national origin, religion, sex, sexual orientation, veteran status, military status (except for Veterans Preference as described in the employment application), association with members of a protected class, marital status, injured worker status, non-supervisory family relationships, or any other protected class or work relationship. All employment requirements mandated by State and Federal laws and regulations are observed.

Any job applicant or employee who believes he or she has been discriminated against because of any protected classification is encouraged to bring his or her concern to the County Counsel who is the designated EEO Officer for the County. Concerns will be investigated immediately and resolved in accordance with Oregon and federal laws. (If the complaint relates to the County Counsel, the job applicant should bring his or her concern to the County Judge.)

The County evaluates its current equal employment opportunity plan once every two years, or sooner if there is need, to help ensure that the plan reflects the County's current practices and the current state of the law. The plan is presented at a public meeting of the Crook County Court (the board of commissioners for Crook County) and deliberated upon prior to enactment. Upon approval of the plan, the original is formally recorded in the records of the Crook County Clerk, and additional copies are available for inspection upon request.

Purpose of the Equal Employment Opportunity Plan:

To explain the idea animating the Federal requirement to draft an Equal Employment Opportunity, it may be useful to start by explaining what is NOT its purpose.

- The EEOP does not require any kind of hiring quota or disparate treatment.
- The EEOP does not mandate any particular type of hiring method.
- The EEOP does not require that the County's workforce exactly match, or even approach, the proportion of the workforce in the wider community within any particular category.

Instead, the purpose of the EEOP requirement is to gather information, and for public agencies to consider in good faith whether the data collected indicates something meaningful. The County is to examine its workforce's demographics, and examine them in the context of reliable comparator information. If there is a disparity, the County is then able to determine whether this might be the result of invidious discrimination, or whether it might be due to innocuous, non-discriminatory causes (including random chance, or the individual choices of private citizens.)

The EEOP is therefore a tool for review and consideration, but not a mandate to undertake any particular action unless the County determines that unlawful discrimination may in fact have been the cause of the disparity. By being armed with such knowledge, the County can thereafter take those steps appropriate to ensure that its hiring practices afford equality of opportunity to all its residents, as the Constitution requires.

Note on Nomenclature:

As more fully described below, determining whether the County's own employee pool over-or-under- represents a particular category requires comparison against the local community. That can lead to confusion as to whether a given paragraph is discussing Crook County as an employer, or Crook County as a community.

For the sake of clarity, in this Equal Employment Opportunity Plan, the term "Crook County" or "the County" will refer to the County as an employer; and the term "community" will refer to the local community workforce population as a whole.

Workforce Comparison Narrative:

In determining whether the County is significantly over-representing or under-representing particular demographic groups in its employee pool, the County draws upon two sources of information. The first is the U.S. Census Bureau American Fact Finder report EEO-ALL06W for Crook County¹, updated July 7, 2017. This report provides information about the county-wide employee pool along three axes: gender (two options), race/ethnicity (six options), and job categories (eight options). The American Fact Finder therefore tracks 96 separate entries for the county-wide workforce.

The second source of information is the EEO-4 form, promulgated by the U.S. Equal Employment Opportunity Commission. Crook County is responsible for filling in the form that the EEOC publishes, based upon the compilation of its own employment data. The EEO-4 form requires entries along three axes: gender (two options), race/ethnicity (seven options), and job categories (eight options). The EEO-4 form therefore tracks 112 separate entries for Crook County's employee workforce.

Data Comparison Issues:

As has been discussed in previous Crook County EEOP's, comparing these two sources of information presents some challenges.

1. *Comparing categories between the Census and EEO-4 form.*

First, while the two documents have the same number of job categories, they do not have the same names for the job categories. For instance, the EEO-4 lists a category entitled "para-professionals," whereas the American Fact Finder does not. Meanwhile, the American Fact Finder report includes two separate types of protective service employees, "sworn" and "unsworn," whereas the EEO-4 form only includes a single category for protective service employees.

For the purpose of this EEOP, the County will compare the following categories against each other:

American Fact Finder category titles	EEO-4 category titles
Officials/Administrators	Officials/Administrators
Professionals	Professionals
Technicians	Technicians
Sworn Protective Services; Unsworn Protective Services	Protective Services
Administrative Support	Administrative Support, Para-Professionals
Skilled Crafts	Skilled Crafts
Service/Maintenance	Service Maintenance

¹ The report is entitled "Crook County, Oregon EEO-ALL06W - State/Local Government Job Groups by Sex and Race/Ethnicity for Worksite Geography, Total Population (Universe: Civilian employed at work 16 years and over)."

2. *Reconciling the different ethnic/racial categories.*

In prior years, the differences between the EEO-4 form and the Census data were even greater than today (e.g. comparing 128 categories in the latter versus 240 categories in the former.) Much of the scale of differences could be attributed to the number and manner in which racial and ethnic groups were tracked between those two forms. For instance, for years the EEO-4 form included “Hispanic” as a separate racial category, while the Census’ American Fact Finder report used the term “Hispanic/Latino”² as an ethnic signifier. This meant that in earlier versions of the EEO-4, an individual could either be Hispanic, or some other racial group; while for the Census report, someone could be simultaneously Hispanic/Latino and White, or Hispanic/Latino and Native American. This difference, in particular, made comparisons between the two sources of information difficult.

This divergence, unfortunately, continues. For the purposes of comparing the two sources of information, the County will treat the term “Hispanic” in the same manner as the EEO-4 report, in the hopes that this will help elucidate whether there are any significant disparities in the workforce. Further, while in prior iterations of these reports, there were entries for individuals claiming two or more racial categories, the reports used for this Plan have eliminated such entries.³

3. *Contradictory data between the two sources.*

In previous years’ Crook County EEOPs, there had been instances where the data from one source showed individuals within one of the categories which was not mirrored in data from the other source for that same (or comparable) category. For instance, the County’s EEO-4 form might show that it had individuals within the Female Native Hawaiian/Pacific Islander Professionals category, where the Census data showed zero such persons in the community workforce.

Fortunately, for this year’s EEOP, no such contradictions have been noted.

Analysis Chart:

Attached to this narrative is a detailed spreadsheet showing the comparisons between the county-wide workforce data and Crook County’s employment pool. In order to assist in evaluating the data, below is an example of one particular sorting: female, white, Officials/Administrators.

² While often used interchangeably, the two terms mean different things. “Hispanic” refers to someone who traces his or her ancestry back to Spain. “Latino” refers to someone who traces their ancestry back to Latin America. A person can be one, or the other, or both.

³ While the decision of the Census Bureau to discontinue these entries may seem dramatic, in Crook County’s case, the number of individuals claiming such categories was extremely low. For instance, for the Census data used in the 2017 Crook County EEOP, the total number of individuals claiming two or more categories was less than 40 in the entire community, out of a population in excess of 20,000 (two tenths of 1%). The vast majority of the two-racial group combinations in the Census data had zero local individuals listed.

Officials/Administrators	5
# community	265
% of County workforce	2.15%
CC % of community workforce	1.89%
% of community workforce	8.00%

Total Female Crook County Employees: 117
Total Female community workforce: 3,312

This chart shows that within Crook County's workforce, there are five individuals which fall within the category of female, white, Official/Administrators. Meanwhile, there are 265 individuals within the wider community workforce which fall within that category. The five individuals in Crook County's workforce comprise 2.15% of the female workers in Crook County ($5 \div 117 = 0.0215$, or 2.15%). The five County employees comprise 1.89% of the total number of White, Female, Official/Administrators in the community workforce ($5 \div 265 = 0.0189$, or 1.89%). Meanwhile, the 265 individuals comprise 8.00% of the total female community workforce of 3,312 workers ($265 \div 3,312 = 8.00\%$).

In this example, there is a difference between the percentage of Crook County's workforce made up of this one racial/ethnic, gender, and professional category, and the percentage of the wider community workforce: $2.15\% - 1.89\% = 0.26\%$ difference. There is also a difference between the proportion of the County's workforce that are White Female Administrator/Officials, and the proportion of White Female Administrator/Officials in the community's workforce: $2.15\% - 8.00\% = 5.85\%$ difference.

The question now becomes whether these differences are statistically significant. If they are, then additional actions on the part of the County may be required to address the disparity. If it is not statistically significant, then it is likely that the difference is due to mere random chance, and no additional actions would be required.

Determination of Significance:

The requirement to publish an EEOP, and the requirement to examine an employer's workforce in comparison to the wider community, are not mandates that a given employer must match exactly the demographics of the region. The law does not require some manner of quota system, and differences between one of the Census categories and one of the EEO-4 categories is not necessarily a sign of anything inappropriate. Further, the smaller the category, the likelier that any one input is determined by random chance. The smallest Crook County category includes only 1 individual, meaning that any change along one of three axes will adjust that category by 100%. A difference of 100% may sound significant in the abstract, but in this example, that literally means that only one single person has changed in one of many different possible ways.

Also, a number of categories produce results that are both very small in both relative and absolute terms. Take the following as an example: the comparisons for Male American Indian/Alaska Native Technicians.

Officials/Administrators	0
# community	4
% of County workforce	0.00%
CC % of community workforce	0.00%
% of community workforce	0.12%

Crook County had zero such employees. However, in the wider community workforce, there are only four such individuals described in the data sources. The question becomes, even if Crook County has zero employees in a given category, does that demonstrate anything more than random chance?

The United States Department of Justice advises that a difference of two standard deviations can be considered significant. They further advise that categories which include fewer than 30 individuals can be disregarded as being too small for statistical significance.

Standard deviation can be found according to the following formula:

$$\text{Standard Deviation} = \sqrt{\frac{\sum |x - \mu|^2}{N}}$$

- Σ (sigma) is a symbol signifying “the sum of” a data set.
- μ (mu) is a symbol signifying the mean (average) of the data set.
- The two vertical lines, “| |” within which are “ $x - \mu$,” signify that we are to find the “absolute value.” This means that if the difference between x and μ is a positive number, no change is made. If, however, the difference between x and μ is negative, the number is rendered into a positive to reflect its “absolute value.”
- x signifies an individual value within the data set.
- N signifies the number of data points in the data set’s “population.”

The order of mathematical operations is as follows:

1. The “data set” is identified.
2. The individual values in the data set are counted. This constitutes the “population” of the data set, which will become the equation’s value of N .
3. The individual entries in the data set are added together, with the resulting sum divided by the value of N . This is used to determine the value for μ .
4. For each individual value in the data set (“ x ”), the value of μ is subtracted. The “absolute value” of the difference of $x - \mu$ is found.
5. The absolute value is then squared for each iteration of $x - \mu$.
6. The squared values are then added together, to find the value of Σ .

7. Σ is divided by N.
8. The dividend of $\Sigma \div N$ is then square-rooted,⁴ to find the value of the standard deviation for the data set.

However, the US DOJ does not provide guidance as to which data set to use to find the appropriate standard deviation. The two obvious possibilities are (1) the standard deviation from the County's workforce; and (2) the standard deviation from the community workforce. While each can be calculated, there is no guidance on which of these two figures to use to determine significance.

The County calculated each value, ignoring data sets where the data showed fewer than 30 individuals in the entire community workforce. The standard deviation for the County's workforce percentages is 10.09%; the standard deviation for the wide community's workforce percentages is 9.25%. "Significance" for each is two standard deviations, or 20.18% and 18.5% respectively.

In light of the lack of guidance as to which of these two values to use to determine whether there is a statistically significant difference between the County's workforce and the wider community workforce, this plan will use the small of the two numbers. The effect of this is that it is more likely that a difference is found to be significant – any difference between the County's workforce and the community workforce of 18.5% or more, for those categories where there are 30 or more employees in the community workforce, is deemed "significant."

For the purpose of Crook County's EEOP, below are the calculations:

1. The data set is identified. In this case, the data set includes the percentages job categories, apportioned among the three axes (gender, racial/ethnic group, job type) for which the value of the wider community workforce is more than 30 individuals. Those values are:

White Male Officials 11.75%	Black Male Officials 1.87%	White Female Officials 8.00%	White Male Professionals 9.21%
White Female Professionals 13.13%	Hispanic Male Technicians 1.34%	White Male Technicians 8.41%	Hispanic Female Technicians 3.02%
White Female Technicians 8.76%	White Male Protective Services 5.45%	White Male Administrative Support 10.95%	White Female Administrative Support 29.59%
Hispanic Male Skilled Craft 1.07%	White Male Skilled Craft 18.42%	White Female Skilled Craft 1.51%	Hispanic Male Service/Maintenance 2.94%
White Male Service/Maintenance 26.3%	Hispanic Female Service/Maintenance 1.96%	White Female Service/Maintenance 32.00%	

⁴ There is probably a more artful way of saying this, but the author of this document did not excel in high school mathematics. The indulgence of the reader is appreciated.

2. N is identified: there are nineteen values in this data set, therefore $N = 19$.
3. μ is calculated: For this data set, the cumulative sum is 195.68%. 195.68% divided by 19 is 10.3%, therefore, $\mu = 10.3\%$.
4. The absolute value for each entry in the data set is calculated, as $|x - 10.3\%|$
5. The square of the absolute values is calculated.

<u>Data Set Entry</u>	<u>Absolute Value</u>	<u>Squared</u>
11.75%	1.45%	2.10%
1.87%	8.43%	71.07%
8.00%	2.30%	5.29%
13.13%	2.83%	8.00%
1.34%	8.96%	80.28%
8.41%	1.89%	3.57%
3.02%	7.28%	53.00%
8.76%	1.54%	2.37%
5.45%	4.85%	23.52%
10.95%	0.65%	0.42%
29.59%	19.29%	372.10%
1.07%	9.23%	85.19%
18.42%	8.12%	65.93%
1.51%	8.79%	77.26%
2.94%	7.36%	54.17%
26.30%	16.00%	256.00%
1.96%	8.34%	69.56%
32.00%	21.70%	470.89%

6. The sum of the squared values is calculated: 1,701.91 %.
7. The sum of the squared values, 1,701.91%, is divided by N, 19: $1,701.91\% \div 19 = 89.57\%$
8. The standard deviation is calculated by finding the square root of the dividend: $\sqrt{89.57\%} = 9.46\%$.

For this data set, the standard deviation is 9.46%.

Two standard deviations is equal to 18.92%.

Analysis:

Using the two standard deviations recommended by the US Department of Justice, the following observations can be made:

- The County overrepresents white male professionals, compared to the wider community workforce. Crook County's white male professionals comprise 21.16% of all such employees in the community workforce.
- The County overrepresents white female professionals, compared to the wider community workforce. Crook County's white female professionals comprise 19.08% of all such employees in the community workforce.

- The County underrepresents white female administrative support employees, compared to the wider community workforce. Crook County's 20 positions comprise 2.04% of all such employees in the community workforce.
- The County underrepresents white male skilled craft employees, compared to the wider community workforce. Crook County has zero such positions, compared to 690 in the wider community workforce.
- The County underrepresents white male service/maintenance employees, compared to the wider community workforce. Crook County's 3 positions comprise 0.30% of all such positions in the wider community workforce.
- The County underrepresents white female service/maintenance employees, compared to the wider community workforce. Crook County has zero such positions, compared to 1,060 in the wider community workforce.
- No other categories are "significantly" different, using two standard deviations to determine significance.
- If only one standard deviation is used to determine significance, then the only other significant finding is that the County underrepresents white male administrative support employees, compared to the wider community workforce.
- Finally, for those six categories with a significant difference, three have zero County employees . If one standard deviation is used to determine significance, then there are seven categories with significant difference, and of those, four have zero County employees.

Therefore, of the categories where Crook County has even a single employee, there are only three (out of 112) for which there is a significant over-or-under-representation. That equals a bare 2.7% of the 112 categories.

The County's past EEOs have found that the rate of significant over-or-under-representation 15, 12, 7, 3, and 3 demographic categories. While the improvement might have plateaued over the last three iterations, the trend has shown significant improvement from where the County began. In particular, the County is very close to having zero categories with no statistically significant differences between its workforce and the wider community workforce.

Based upon this data, the County finds that its hiring processes have successful in preventing discrimination in the hiring of qualified employees, and that these hiring practices should continue.

Objectives:

- Crook County is committed to continue hiring and employment practices that adhere to the County's Equal Employment Opportunity Plan, and improve minority opportunities for employment with the County.
- Increase representation in the identified "underrepresented" job categories as identified above, while maintaining current levels for those categories which are within the range as being significantly proportionate.

Steps to Achieve Objectives:

The following steps will be implemented to address the County's objectives:

- Provide training opportunities for employees in all job classifications to upgrade their skills and improve their career development opportunities in conjunction with the "Education and Training" Policy, which can be found in the Crook County Employee Policy Handbook.
- Review and update the County's recruitment policies and procedures to promote equal employment opportunities, as needed.
- Continue to offer reimbursements for education, classes and seminars that could promote bilingual and secondary language skills, as outlined in the "Education and Training" Policy, which can be found in the Crook County Employee Policy Handbook.
- Explore new methods to recruit employees.

Dissemination:

The Human Resources Director, or appointed County representative, will be designated to implement the Equal Employment Opportunity Plan for Crook County.

External

- Continue to include the "Equal Employment Opportunity" statement on the Crook County 'Employment Application' and the 'Sheriffs Application' (employment).
- In newspaper and external postings, advertise as "EEO".
- Continue to include the "Equal Employment Opportunity" statement on the Crook County 'Human Resources' department webpage.
- Continue to maintain the availability of the Crook County Employee Policy Handbook, which contains all relevant policies associated with the County's Equal Employment Opportunities, including by keeping it on the County website available for free download.
- The County welcomes and encourages comments upon this EEO Plan, which should be directed to the County's Equal Employment officer.

Internal

- Provide the 'Employee Questionnaire for Self-Identification of Race/ Ethnicity' at new hire orientation.
- Provide newly hired employees with the Crook County Employee Policies Handbook.
- Provide hiring and selection assistance to all County hiring managers that promote the County's Equal Employment Opportunity Plan and Crook County Employee handbook Policies.
- The County welcomes and encourages comments upon this EEO Plan, which should be directed to the County's Equal Employment officer.

Admin. Support
 # community
 % of County workforce
 CC % of community workforce
 % of community workforce

Skilled Craft
 # community
 % of County workforce
 CC % of community workforce
 % of community workforce

Service/Maint.
 # community
 % of County workforce
 CC % of community workforce
 % of community workforce

0	0	0	0	0	20	2
4	410	4	4	20	980	4
0.00%	0.00%	0.00%	0.00%	0.00%	8.58%	0.86%
0.00%	0.00%	0.00%	0.00%	0.00%	2.04%	50.00%
0.11%	10.95%	0.11%	0.11%	0.60%	29.59%	0.12%
0	0	0	0	0	0	0
40	690	40	40	50	50	50
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1.07%	18.42%	1.07%	1.07%	1.51%	1.51%	1.51%
0	3	0	0	0	0	0
110	985	4	15	65	1060	4
0.00%	1.29%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%
2.94%	26.30%	0.11%	0.40%	1.96%	32.00%	0.12%

Total

116	117
Total Male community workforce	Total Female community workforce
3745	3312
Percent of community workforce:	Total County workforce:
Male 53.07%	233
Female 46.93%	

Percent of County workforce:	
Male	49.79%
Female	50.21%
Total community workforce	7057