# CERTIFICATION FORM

Recipient Name and Address: City of Sanford, 225 East Weatherspoon Street, PO Box 3729, Sanford, NC 27330

Grant Title: Edward Byrne Memorial Justice Assistance Grant Grant Number: 2009-SB-B9-1762 Award Amount: $87,988

Contact Person Name and Title: Darla Cole Phone Number: (919) 356-4145

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 (EEOP) in accordance with 28 C.F.R §§ 42.301-.308. The regulations exempt some recipients from all of the EEOP requirements. Other recipients, according to the regulations, must prepare, maintain on file and implement an EEOP, but they do not need to submit the EEOP to OJP for review. Recipients that claim a complete exemption from the EEOP 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 EEOP 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 7th 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 EEOP Requirement. *Please check all the boxes that apply.*

- ☐ Recipient has less than 50 employees,
- ☐ Recipient is a non-profit organization,
- ☐ Recipient is a medical institution,
- ☐ Recipient is an Indian tribe,
- ☐ Recipient is an educational institution, or
- ☐ Recipient is receiving an award less than $25,000

I, _____ **[responsible official]**, certify that _____ **[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 _____ **[recipient]** will comply with applicable Federal civil rights laws that prohibit discrimination in employment and in the delivery of services.

**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, Hal Hegwer **[responsible official]**, certify that the City of Sanford **[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: Human Resources **[organization]**, at 225 East Weatherspoon Street, Sanford, NC 27330 **[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.

Hal Hegwer, City Manager — 9/2/09

**Print or type Name and Title** **Signature** **Date**

OMB Approval No. 1121-0140 Expiration Date: 01/31/06

# EEOP Short Form

Tue Sep 01 14:42:44 EDT 2009

## Step 1: Introductory Information

| | | | |
|---|---|---|---|
| **Grant Title:** | FY 09 Recovery Act Edward Byrne Memorial Justice Assistance Grant Program Local Solicitation | **Grant Number:** | 2009-SB-B9-1762 |
| **Grantee Name:** | City of Sanford | **Award Amount:** | $87,988.00 |
| **Grantee Type:** | Local Government Agency | | |
| **Address:** | 225 East Weatherspoon Street<br>Sanford, North Carolina<br>27330 | | |
| **Contact Person:** | Darla Cole | **Telephone #:** | 919-356-4145 |
| **Contact Address:** | 225 East Weatherspoon Street<br>Sanford, North Carolina<br>27330 | | |
| **DOJ Grant Manager:** | Starr Small | **DOJ Telephone #:** | 202-514-9870 |

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## Policy Statement:

It is the policy of the City of Sanford to maintain and promote equal employment opportunity. The city shall select employees on the basis of applicants qualifications and without regard to age, sex, race, color, creed, religion, disability, political affiliation or national origin. The Human Resources Department shall implement the Equal Employment Opportunity policy through recruitment and employment opportunity based on reasonable performance-related job requirements. Notices with regard to equal employment matters shall be posted in conspicuous places on city premises in places where notices are customarily posted.

## STEP 4b: NARATIVE INTERPRETATION

A comparison of the City of Sanford's workforce to the 2000 Community Labor Statistics for the Lee County, North Carolina area indicate that underutilization of minorities ranges from 0% to 17% and underutilization of females ranges from 0% to 28%.

### Officials and Managers

This category includes occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the City's operations, or provide specialized consultation on a citywide basis. Most of the incumbents in this category are the Department Directors, the City Manager, the Assistant Directors and the Deputy Directors. This category also includes a number of positions that are regulatory such as building and construction inspectors, auditors, investigators and managers. The Mayor and City Council members are not included in this analysis since they are elected public officials and, as such, are not considered employees for reporting to the EEOC. Board/Committee members are also excluded.

Relative to the labor pool, white males are overutilized by 25%. White females are underutilized by 17%. Hispanic or Latino males and black or African American males and females are underutilized by very small percentages; 3% or less.

### Professionals

This category includes occupations that require specialized and theoretical knowledge that is usually acquired through college training or through work experience and other training that provides comparable knowledge. Some of the incumbents in this category include some managers and supervisors of the organization, HR analyst, accountants, engineers, pre-treatment coordinator, and planners.

Hispanic or Latino and black or African American males and Hispanic or Latino and Asian females are underutilized by very small percentages; 1% or less. White females are underutilized by 15%.

### Technicians

This category includes occupations that require a combination of basic scientific or technical knowledge and manual skill that can be obtained through specialized post-secondary school education or through equivalent on-the-job training. Includes: technicians (traffic service, planning, laboratory, accounting, engineering), drafters, and computer programmers.

Relative to the labor pool, white males are overutilized by 36% and white females are underutilized by 28%. Hispanic or Latino males are underutilized by 4% and black or African American males by 7%. Given the small number of employees (10) in the job

category, it is difficult to interpret the level of underutilization in relation to the relevant community labor market.

**Protective Services: Sworn**

This job category includes occupations in which workers are entrusted with public safety, security and protection from destructive forces. The Protective Services – Sworn category is made up of sworn Patrol Officers and Officials and non-sworn Firefighters. Although City of Sanford firefighters are non-sworn, they have been included in this job category on the workforce chart for the EEOP. This reclassification was necessary as the Protective Services job category where fire personnel were previously classified no longer exist. Instead, new categories of Protective Services Sworn (4) and Protective Services Non-Sworn (5) have been created. According to Office of Justice Programs EEOP direction, the City should use the job classifications listed on the US Census Bureau's web site; job category 4 (protective services sworn) for firefighters and fire inspectors. Given these reclassifications, it is difficult to draw any reliable conclusions regarding underutilization. They are; however, noted below.

*Officials* – White males are slightly underutilized (3%). Females are slightly underutilized for white (1%) and black or African American (5%). There are few white and black or African American females in this category in the labor pool, which is reflected in the City's workforce.

*Patrol Officers* – Relative to the labor pool, white males are overutilized by 41%, while Hispanic or Latino and black or African American males are underutilized slightly, by 4% or less. Females are underutilized by 19% for white, 4% for Hispanic or Latino, and 13% for black or African American.

**Protective Services: Non-sworn**

This job category includes occupations that perform technical and support work in safety or law enforcement work, which does not require a sworn person. Examples include community service officers and animal control officers. The City of Sanford has no personnel in this job category.

**Administrative Support**

This category includes occupations in which workers are responsible for internal and external communications, recording, and retrieval of data and/or information and other paperwork required in an office. The incumbents in this category are mostly secretaries, administrative office assistants, staff assistants, police clerks, accounting clerks, permit coordinators, etc. It also includes meter readers.

Minorities are underutilized by 2% or less.

**Skilled Craft**

Skilled Craft includes occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the processes involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. It includes a variety of jobs such as water and wastewater treatment operators, utility technicians, equipment operators, and mechanics.

Hispanic or Latino males are underutilized by 10% and white females by 3%. American Indian males, Hispanic or Latino females, and black or African American females are each underutilized by 1%. With the exception of Hispanic or Latino males, minorities in the labor pool for this category are almost non-existent, leading to an analysis that is virtually meaningless.

**Service/Maintenance**

This category includes occupations in which workers perform duties that result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property. Includes: maintenance workers, turfgrass technicians, and groundskeepers.

White males are overutilized by 39% compared to the labor pool. Hispanic or Latino males and females are underutilized by 7% or less, and white and black or African American females are underutilized by 18% or less.

## Step 4b: Narrative Underutilization Analysis

Please see the attached hardcopy document; STEP 4b: NARATIVE INTERPRETATION

## Step 5 & 6: Objectives and Steps

**1. In keeping with the City of Sanford's commitment to having a workforce that reflects the community it serves, the City will examine recruitment, promotional, training, and retention practices to ensure all individuals of our applicant pool receive equal opportunity to secure employment. Human Resources will continue to review all job requirements, selection, and hiring procedures to ensure no unnecessary barriers exist that would deny anyone equal opportunity with the City.**

a. The Human Resources office will review the composition of the applicant pool for vacancies in the Protective Services: Sworn - Patrol Officers and Service/Maintenance job categories in the last fiscal year to determine whether black or African American females were under-represented.

b. The Human Resources office will review the composition of the applicant pool for vacancies in the Skilled Craft and Service/Maintenance job categories in the last fiscal year to determine whether Hispanic or Latino males were under-represented.

c. The Human Resources office will review the composition of the applicant pool for vacancies in the Service/Maintenance job category in the last fiscal year to determine whether Hispanic or Latino females were under-represented.

d. The Human Resources office will enhance outreach efforts and target publications, associations, job fairs, educational institutions, etc. that service white female applicants in the Officials, Professionals, Technicians, Protective Services: Sworn - Patrol Officers, and Service/Maintenance job categories.

e. The Human Resources office will enhance outreach efforts and target publications, associations, job fairs, educational institutions, etc. that service black or African American female applicants in the Protective Services: Sworn - Patrol Officers and Service/Maintenance job categories.

f. The Human Resources office will enhance outreach efforts and target publications, associations, job fairs, educational institutions, etc. that service Hispanic or Latino male applicants in the Skilled Craft and Service/Maintenance job categories.

g. The Human Resources office will enhance outreach efforts and target publications, associations, job fairs, educational institutions, etc. that service Hispanic or Latino female applicants in the Service/Maintenance job category.

h. The Human Resources office will continue to evaluate employment and selection procedures for job-relatedness, validity, and effectiveness, and identify and eliminate any artificial barriers to employment.

i. The Human Resources office will continue to provide EEO/diversity training to supervisors and managers.

j. The Human Resources office will provide recruitment and selection training to supervisors and managers.

k. The Human Resources office will report to the City Manager the analysis of the City of Sanford's workforce and actions taken within the EEO Plan.

l. The Human Resources office will review the composition of the applicant pool for vacancies in the Officials, Professionals, Technicians, Protective Services: Sworn - Patrol Officers, and Service/Maintenance job categories in the last fiscal year to determine whether white females were under-represented.

## Step 7a: Internal Dissemination

1. Continue to include the statement that the City of Sanford is an "Equal Opportunity Employer" on all job applications and internal job postings.

2. The Human Resources office will include a discussion of the EEOP Short Form during new employee orientation and inform employees that a copy is available for review or copy in the Human Resources office.

3. The Human Resources office will maintain a bound copy of the EEOP Short Form on display in the reception area of its office at City Hall.

4. The Human Resources office will include a written notice in the employee newsletter, explaining how employees may obtain a copy of the EEOP Short Form.

5. The Human Resources office will post a notice at each City job site, on bulletin boards that employees regularly check, explaining how employees can obtain a copy of the EEOP Short Form.

## Step 7b: External Dissemination

1. Continue to include the statement that the City of Sanford is an "Equal Opportunity Employer" on all job applications and external job advertisements.

2. Post the EEOP Short Form on the City of Sanford website.

3. Post a notice in each "Current Job Listings" book, located in the Human Resources office, explaining how applicants and members of the public may obtain a copy of the EEOP Short Form.

## Utilization Analysis Chart

***Relevant Labor Market: Lee County, North Carolina***

| 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 |
| **Officials/Administrators** | | | | | | | | | | | | | | |
| Workforce #/% | 26/81% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 5/16% | 0/0% | 1/3% | 0/0% | 0/0% | 0/0% | 0/0% |
| CLS #/% | 1,525/56% | 80/3% | 75/3% | 10/0% | 4/0% | 0/0% | 0/0% | 900/33% | 10/0% | 125/5% | 0/0% | 0/0% | 0/0% | 4/0% |
| Utilization #/% | 25% | -3% | -3% | -0% | -0% | 0% | 0% | -17% | -0% | -1% | 0% | 0% | 0% | -0% |
| **Professionals** | | | | | | | | | | | | | | |
| Workforce #/% | 15/52% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 11/38% | 0/0% | 3/10% | 0/0% | 0/0% | 0/0% | 0/0% |
| CLS #/% | 1,090/32% | 45/1% | 65/2% | 0/0% | 10/0% | 0/0% | 0/0% | 1,815/53% | 30/1% | 340/10% | 0/0% | 35/1% | 0/0% | 4/0% |
| Utilization #/% | 20% | -1% | -2% | 0% | -0% | 0% | 0% | -15% | -1% | 0% | 0% | -1% | 0% | -0% |
| **Technicians** | | | | | | | | | | | | | | |
| Workforce #/% | 7/70% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 2/20% | 0/0% | 1/10% | 0/0% | 0/0% | 0/0% | 0/0% |
| CLS #/% | 210/34% | 25/4% | 45/7% | 0/0% | 0/0% | 0/0% | 0/0% | 295/48% | 0/0% | 45/7% | 0/0% | 0/0% | 0/0% | 0/0% |
| Utilization #/% | 36% | -4% | -7% | 0% | 0% | 0% | 0% | -28% | 0% | 3% | 0% | 0% | 0% | 0% |
| **Protective Services: Sworn-Officials** | | | | | | | | | | | | | | |
| Workforce #/% | 57/78% | 2/3% | 7/10% | 2/3% | 0/0% | 0/0% | 0/0% | 5/7% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| CLS #/% | 245/81% | 0/0% | 15/5% | 4/1% | 0/0% | 0/0% | 0/0% | 25/8% | 0/0% | 15/5% | 0/0% | 0/0% | 0/0% | 0/0% |
| Utilization #/% | -3% | 3% | 5% | 1% | 0% | 0% | 0% | -1% | 0% | -5% | 0% | 0% | 0% | 0% |
| **Protective Services: Sworn-Patrol Officers** | | | | | | | | | | | | | | |
| Workforce #/% | 37/76% | 2/4% | 5/10% | 0/0% | 1/2% | 0/0% | 0/0% | 3/6% | 0/0% | 1/2% | 0/0% | 0/0% | 0/0% | 0/0% |
| Civilian Labor Force #/% | 775/35% | 180/8% | 275/12% | 10/0% | 10/0% | 0/0% | 0/0% | 555/25% | 100/4% | 330/15% | 0/0% | 0/0% | 0/0% | 0/0% |
| Utilization #/% | 41% | -4% | -2% | -0% | 2% | 0% | 0% | -19% | -4% | -13% | 0% | 0% | 0% | 0% |
| **Protective Services: Non-sworn** | | | | | | | | | | | | | | |
| Workforce #/% | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ | 0/ |
| CLS #/% | 10/33% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 20/67% | 0/0% | 0/0% | 0/0% |
| Utilization #/% | | | | | | | | | | | | | | |
| **Administrative Support** | | | | | | | | | | | | | | |

| 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 |
| Workforce #/% | 13/27% | 0/0% | 2/4% | 0/0% | 0/0% | 0/0% | 0/0% | 28/58% | 0/0% | 5/10% | 0/0% | 0/0% | 0/0% | 0/0% |
| CLS #/% | 1,150/25% | 80/2% | 145/3% | 15/0% | 0/0% | 0/0% | 0/0% | 2,770/59% | 50/1% | 460/10% | 15/0% | 0/0% | 0/0% | 0/0% |
| Utilization #/% | 3% | -2% | 1% | -0% | 0% | 0% | 0% | -1% | -1% | 1% | -0% | 0% | 0% | 0% |
| **Skilled Craft** | | | | | | | | | | | | | | |
| Workforce #/% | 45/82% | 1/2% | 7/13% | 0/0% | 0/0% | 0/0% | 0/0% | 2/4% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| CLS #/% | 2,285/66% | 410/12% | 415/12% | 25/1% | 10/0% | 0/0% | 0/0% | 240/7% | 35/1% | 40/1% | 10/0% | 0/0% | 0/0% | 4/0% |
| Utilization #/% | 16% | -10% | 1% | -1% | -0% | 0% | 0% | -3% | -1% | -1% | -0% | 0% | 0% | -0% |
| **Service/Maintenance** | | | | | | | | | | | | | | |
| Workforce #/% | 23/66% | 3/9% | 8/23% | 0/0% | 0/0% | 0/0% | 0/0% | 1/3% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| CLS #/% | 2,345/27% | 1,315/15% | 1,075/12% | 0/0% | 25/0% | 0/0% | 10/0% | 1,835/21% | 515/6% | 1,465/17% | 10/0% | 25/0% | 0/0% | 20/0% |
| Utilization #/% | 39% | -7% | 10% | 0% | -0% | 0% | -0% | -18% | -6% | -17% | -0% | -0% | 0% | -0% |

## Law Enforcement Category Rank Chart

| 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 |
| **Firefighter Inspector** | | | | | | | | | | | | | | |
| Workforce #/% | 0/0% | 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% |
| **Firefighter** | | | | | | | | | | | | | | |
| Workforce #/% | 26/74% | 1/3% | 4/11% | 1/0% | 0/0% | 0/0% | 0/0% | 3/9% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| **Police Chief** | | | | | | | | | | | | | | |
| 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% |
| **Assistant Chief of Police** | | | | | | | | | | | | | | |
| 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% |
| **Police Major** | | | | | | | | | | | | | | |
| 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% |
| **Captain** | | | | | | | | | | | | | | |
| Workforce #/% | 8/100% | 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% |
| **Sergeant** | | | | | | | | | | | | | | |
| Workforce #/% | 6/86% | 0/0% | 1/14% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| **Detective** | | | | | | | | | | | | | | |
| Workforce #/% | 8/80% | 0/0% | 1/10% | 1/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| **Narcotics Agent** | | | | | | | | | | | | | | |
| Workforce #/% | 3/75% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 1/25% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| **Reservist** | | | | | | | | | | | | | | |
| Workforce #/% | 3/60% | 0/0% | 1/20% | 0/0% | 0/0% | 0/0% | 0/0% | 1/20% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% | 0/0% |
| **Protective Services: Sworn-Patrol Officers** | | | | | | | | | | | | | | |
| Workforce #/% | 37/76% | 2/4% | 5/10% | 0/2% | 1/2% | 0/0% | 0/0% | 3/6% | 0/0% | 1/2% | 0/0% | 0/0% | 0/0% | 0/0% |

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 EEOP Short Form.

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

| [signature] | CITY MANAGER [title] | 9/2/09 [date] |
|---|---|---|