

FINAL AUDIT REPORT



Affirmative Action Plan Audit 2019

A Report to the Audit and Finance Committee

Mayor

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Mayor-Commissioner Pro Tem

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February 5, 2020

City of
Gainesville
Office of the City
Auditor

Interim City Auditor

Leonard F. Loria, CPA

AFFIRMATIVE ACTION PLAN AUDIT 2019

EXECUTIVE SUMMARY

February 5, 2020



BACKGROUND

The City Charter requires the City Auditor to perform compliance audits on the implementation of the City's human relations and equal opportunity ordinances, policies, and programs pertaining to the activities of the City. The audit of the City's Affirmative Action Plan was included in the City Auditor's 2019 Fiscal Year Audit Plan at the request of the Office of Equal Opportunity Director.

The City Auditor's Office retained an external third-party firm to perform the engagement. The scope of the audit included all positions with an affirmative action goal during calendar years 2017 and 2018.

OBJECTIVES

The primary objectives of the engagement were to:

- Assess the reliability of information obtained for input in the Affirmative Action Plan
- Analyze General Government and Gainesville Regional Utilities hiring for positions with affirmative action goals to determine the department's general compliance with program goals
- Sample testing to determine compliance.

KEY ACTIONS THAT MANAGEMENT CAN TAKE

Based on the consultant's report, opportunities exist for management to:

- Continue leveraging the Berkshire BalanceAAP software
- Establish standard periodic review of AAP hiring goals, which are integrated as a part of HR data capture, management, and extraction
- Establish data governance practices, execution, and review to eliminate dependence on any person's institutional knowledge to accurately produce foundation data used to build the plan
- Implement regular reporting/audit practices to eliminate the need to pull these physical paper records for periodic audit review
- Review how to better align the City's new ERP with universal EEO field and tabular nomenclature to help promote standardization and eliminate human interpretation challenges.

Affirmative Action Plan Audit 2019 (Calendar Years 2017 and 2018)

September 9, 2019



September 9, 2019

Honorable Mayor and Members of the City Commission
City of Gainesville, Florida

We are pleased to present the results of our audit of the Affirmative Action Plan (AAP) as a part of the City Auditor's 2019 Annual Audit Plan.

This report summarizes our audit, various analyses and observations related to the City's development and implementation of its AAP plans and goals. The document also contains the communications required by our professional standards.

Our audit was designed to express opinions on the following items:

- 1) Assess the reliability of information obtained for input into the AAP from the Human Resource Office.
- 2) Conduct an analysis of General Government and Gainesville Regional Utilities hiring for all positions with an AAP goal during calendar years 2017 and 2018. This analysis will determine the departments' general compliance with AAP program elements. Much of this work was conducted on site since it required following up with various departments, reviewing documentation, and conducting interviews.
- 3) Random, statistical sampling was used to determine compliance.

We took into consideration that the City of Gainesville has a voluntary Affirmative Action Plan (AAP) in place using as a guide US Executive Order 11246 and its implementing instructions. We conducted the audit objectively and independently. We received the full support and assistance of the City's personnel.

At Carr, Riggs & Ingram, LLC (CRI), we are continually evaluating the quality of our professionals' work in order to deliver audit services of the highest quality that will meet or exceed your expectations. We encourage you to provide any feedback you believe is appropriate to ensure that we do not overlook a single detail as it relates to the quality of our services.

This report is intended solely for the information and use by you and the management of the City and should not be used by anyone other than these specified parties.

We appreciate this opportunity to work with you. If you have any questions or comments, please contact me at 832-333-7542 or at twoods@crisolutionsgroup.com

Very truly yours,



Timothy L. Woods
Director

BACKGROUND

The City of Gainesville, FL has a voluntary Affirmative Action Plan (AAP) in place using as a guide US Executive Order 11246 and its implementing instructions. As part of the City Auditor's 2019 Annual Audit Plan, an audit of the implementation of the AAP is to be performed. The City Auditor desired to contract with a consultant to perform the engagement. The AAP is implemented and overseen by the Office of Equal Opportunity, a Charter Officer of the City of Gainesville. As such, this shall be considered a proactive audit at the request of the client to be performed by an external entity as a matter of compliance with its present success criteria. This is a matter of due diligence and not by duress of any federal agency.

While the City and its hiring managers are committed to pursuing AAP goals, they are not to engage in hiring of an applicant based on any protected class, including race or gender. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the organization to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more qualified one.

OBJECTIVES

Conduct a performance audit of the Office of Equal Opportunity's Affirmative Action Plan, focusing on:

- 1) Assessing reliability of information obtained for input into the AAP from the Human Resource Office (reports to the City Manager);
- 2) Conducting an analysis of General Government and Gainesville Regional Utilities hiring outcomes.

WHAT WE FOUND

- Established AAP documentation development tools (i.e. Berkshire-BalanceAAP) with business unit specific plans for General Government and Gainesville Regional Utilities respectively.
- Inconsistent data extract procedures to build AAP policies.
- Highly dependent on current data manager.
- Inconsistent reporting or periodic review of AAP performance against defined goals.
- Inconsistent nomenclature between systems of record (i.e. NeoGov & CGI Advantage).
- Defined and executed collaborative process to review each job posting to review AAP goal and perform appropriate advertising actions to source best-qualified candidates.

GOVERNANCE

The Equal Opportunity Affirmative Action Manager has the overall responsibility for developing and implementing the Affirmative Action Plan. Duties of the Equal Opportunity Director include planning and coordinating affirmative action efforts, coordinating the preparation of the Affirmative Action Plan and any updates, as well as identifying problem areas and proposing solutions.

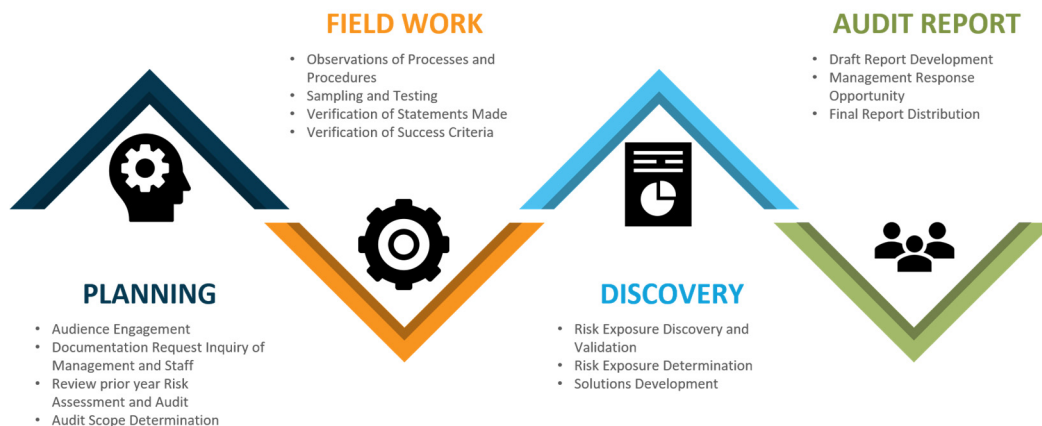
The City also has an Affirmative Action Subcommittee whose role is to advise the Equal Opportunity Director in the development and communication of the AAP. The AAP leverages governance and regulations of the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP).

The AAP analyzes workforce race and gender designations, and develops placement goals to address areas where minority or female under-utilization is determined. The AAP presents the information via the following sections:

- **Organizational Profile** – An overview of the staffing patterns used to determine whether there are areas in the workforce where minorities or women are underrepresented or concentrated.
 - Workforce Analysis Methodology – Identifies each department, lists all job titles from the lowest paid to the highest paid.
- **Job Group Analysis** – A method of combining job titles into job groups to organize the workforce into manageable size groups to facilitate analysis.
 - Job group analysis takes into account: Similarity of duties and responsibilities; Similarity of compensation; and Similarity of opportunities for advancement including training, transfers, promotions, mobility, and other career enhancements.
- **Availability Analysis** – Establishes a benchmark against which demographic composition of the City’s workforce may be compared to determine whether barriers to equal employment opportunity exists. Provides a statistical estimate of the current availability of minorities and women for each job group.
 - EEO Tabulation 2006-2010 American Community Survey data is used to provide the most current and discrete statistical data to minimize exclusion of qualified minorities and women.
- **Incumbency versus Estimated Availability** – Displays representation of minorities and women in each job group with their representation among those identified in the availability analysis as available for employment.
- **Placement Goals** – Highlights areas where actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability.

SCOPE AND METHODOLOGY

The scope of this effort is all positions with an AAP goal during calendar years 2017 and 2018. This analysis will determine the departments’ general compliance with AAP program elements. Much of this work was conducted on-site since it required following up with various departments, reviewing documentation, and conducting interviews. During the engagement, we spoke with management and key personnel and obtained and reviewed documentation submitted by management to verify implementation status.

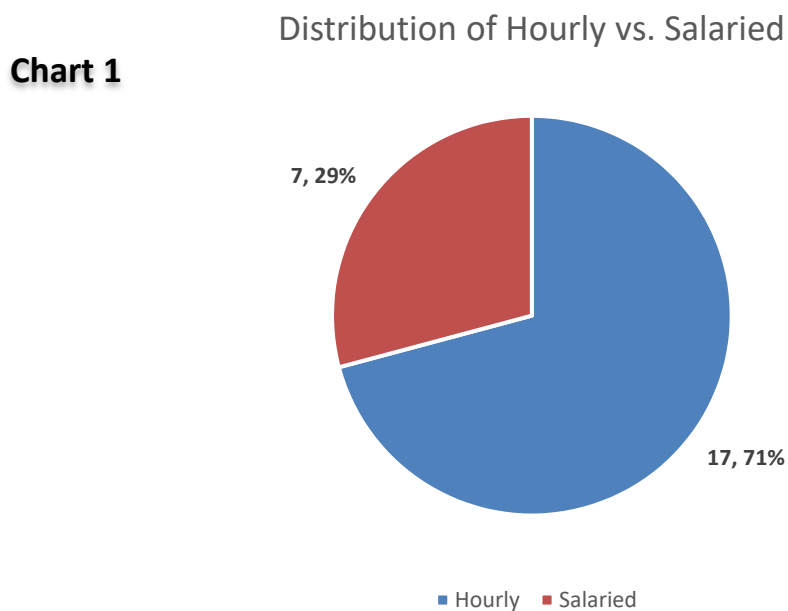


RELATED FACTS AND FIGURES

At the direction of the Interim City Auditor in July 2019, we leveraged data from NeoGov (Postings with an AAP goal) to build the agreed calculated sample size. We combined data from calendar years 2017 and 2018 postings with an AAP goal and obtained the following information:

1. Combine 2017 and 2018 posting population (156+142=298 with goals); and
2. Sample the 298 (based on ACL random sampling size calculation for 90% confidence level, 10% upper error, 0 expected error, the sample size is 24).

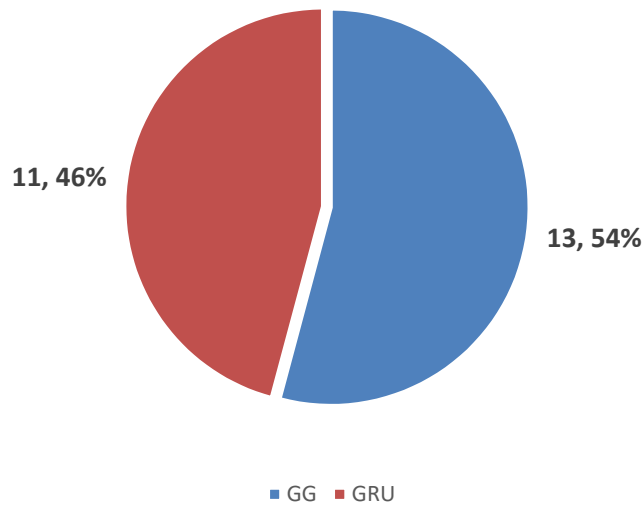
The following Charts show baseline comparative analytics for the Personnel Requisition Action Forms (PRAFs) that were sampled for AAP goal review. The data is based on physical applicant/hire records provided by Human Resources.



Within the sample set of 24 PRAFs, there were 17 positions that have classification of 'Hourly' and seven that were 'Salaried'.

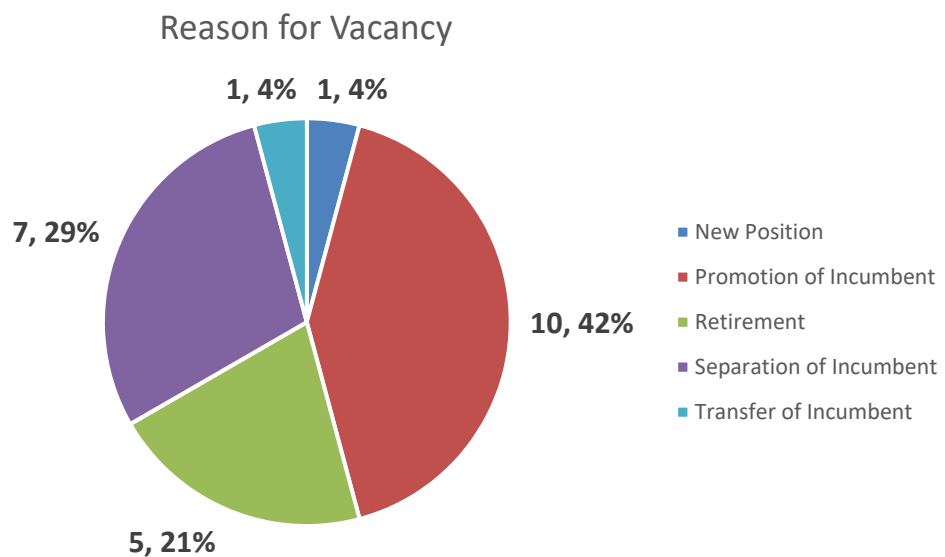
General Government (GG) vs. Gainesville Regional Utilities (GRU)

Chart 2



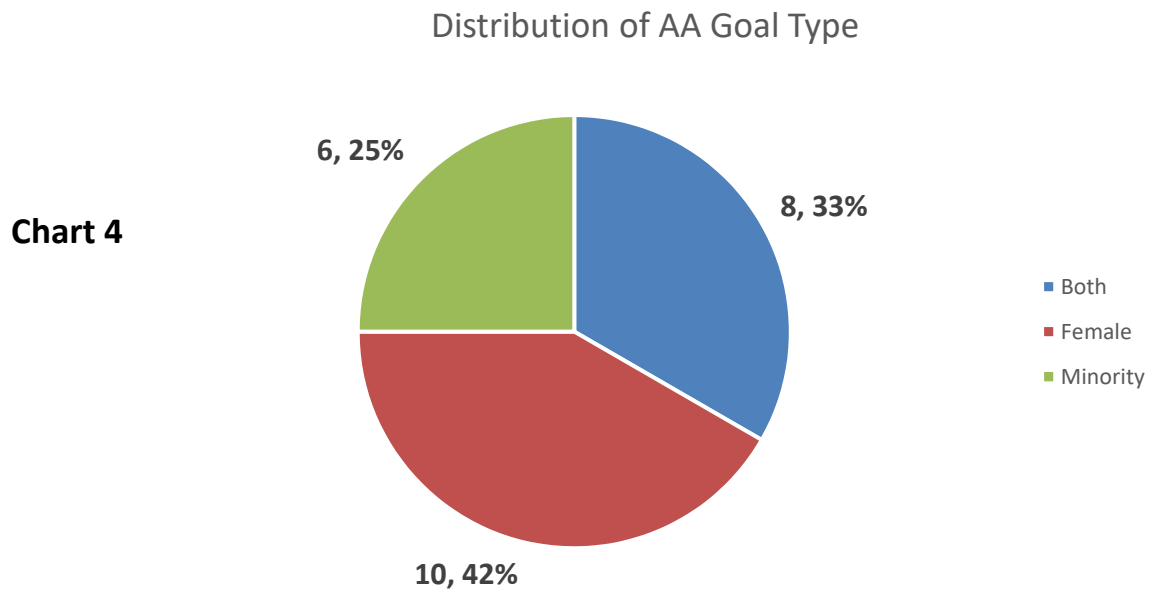
Within the sample set of 24 PRAFs, there were 11 positions that have organization designation within GRU and 13 within GG.

Chart 3



Within the sample set of 24 PRAFs, there were:

- 10 positions vacant due to 'Promotion of Incumbent';
- 7 positions vacant due to 'Separation of Incumbent';
- 5 positions vacant due to 'Retirement';
- 1 position vacant due to 'Transfer of Incumbent'; and
- 1 position available due to it being a 'New Position'.



Within the sample set of 24 PRAFs, there were:

- 10 positions have AA requirement to seek a qualified 'Female' to fill the position;
- 8 positions have AA requirement to seek a qualified 'Minority' or 'Female' to fill the position; and
- 6 positions have AA requirement to seek a qualified 'Minority' to fill the position.

Charts 5 through 8 provide a look at the success rate in meeting the defined AAP goal.

- 'Overall AAP Goal Met' shows 63% of the sample set satisfied the defined AAP goal (15 of 24 PRAFs).
- 'Success Rate when AAP Goal is Both' shows a 75% satisfaction rate when seeking a qualified Female or Minority candidate.
- 'Success Rate when AAP Goal is Female' shows a 60% satisfaction rate when seeking a qualified Female candidate.
- 'Success Rate when AAP Goal is Minority' shows a 50% satisfaction rate when seeking a qualified Minority candidate.

Chart 5

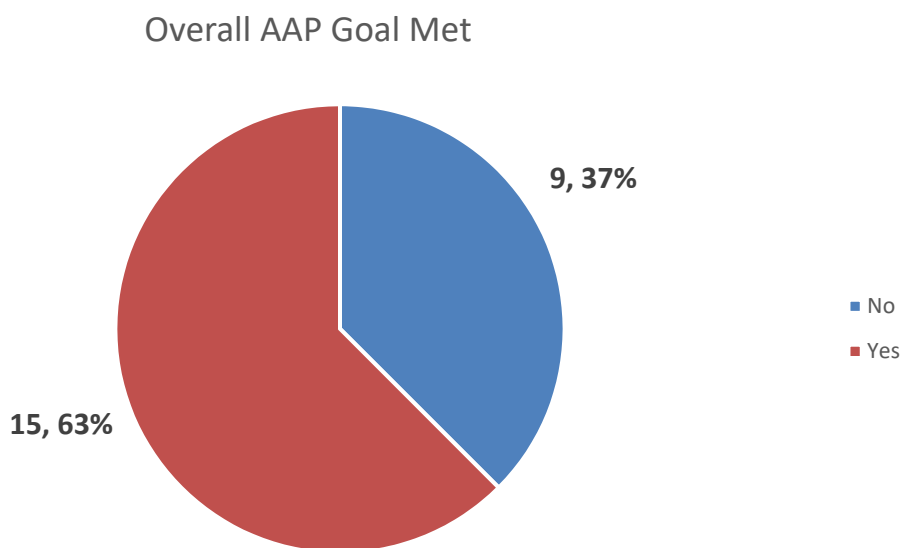
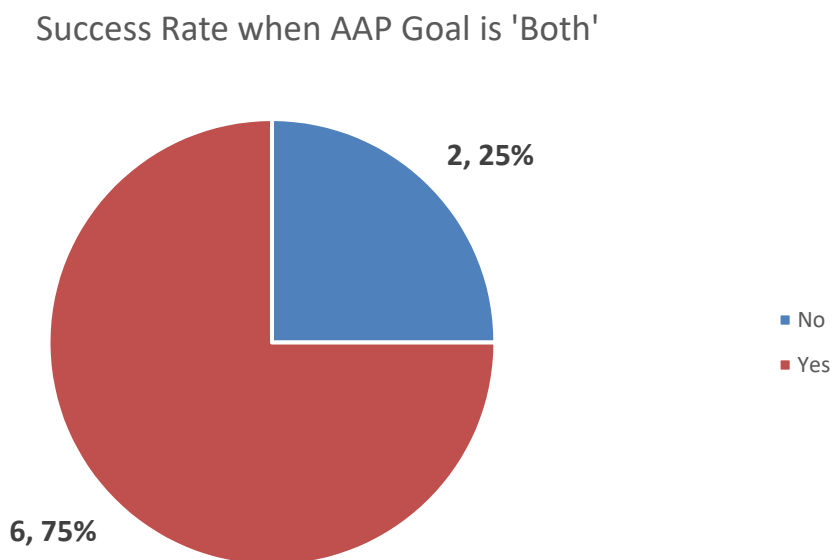
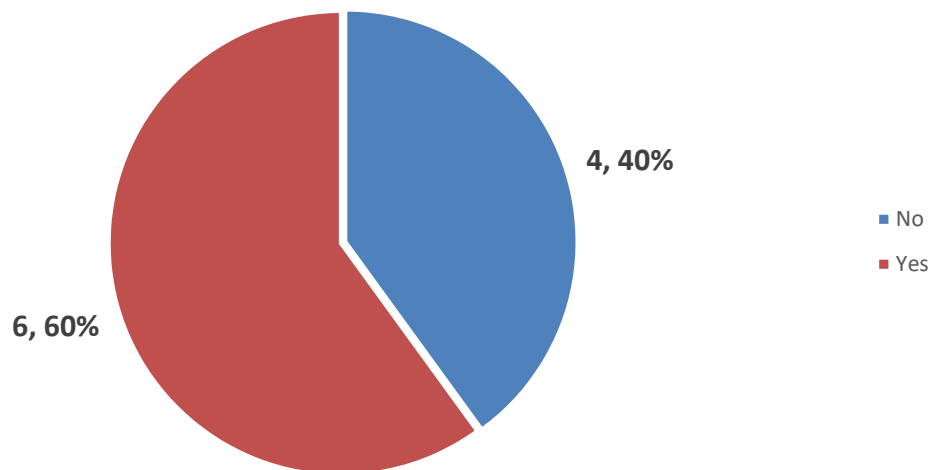


Chart 6



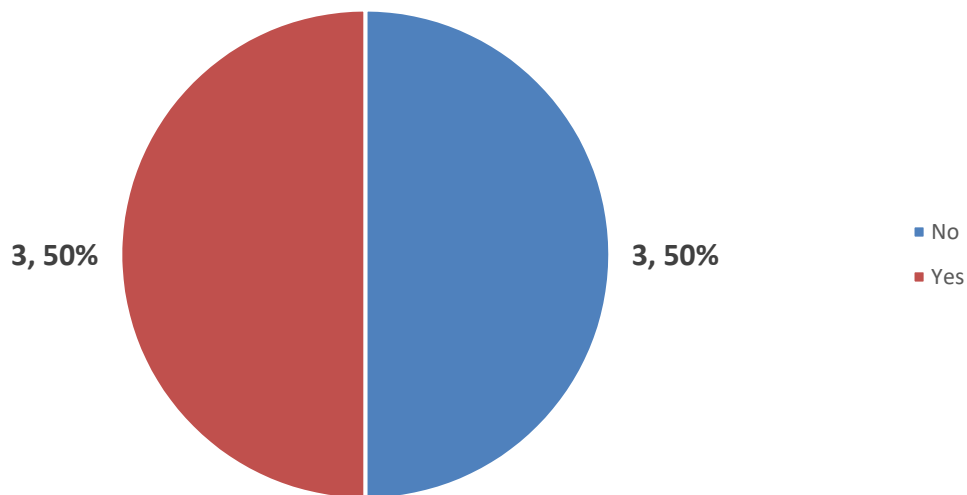
Success Rate when AAP Goal is 'Female'

Chart 7



Success Rate when AAP goal is 'Minority'

Chart 8



Sample Set Itemized Data

Table 1

The table below details the Personnel Requisition Action Form (PRAF), Exam Plan, Position, Reason for Posting, AAP Goal Type and if the Goal was met for the 24 positons, which were reviewed as a part of this study.

PRAF	EXAM #	AREA	H/S	POSITION TITLE	Reason for Posting	Status	AAP Goal	Goal Met
5377	04341C	GG	Hourly	Firefighter	Separation of Incumbent	Filled	Minority	Yes
6195	5946	GG	Hourly	Building Inspector	New Position	Filled	Both	Yes
6313	010-06313	GRU	Hourly	Energy Delivery Planner	Retirement	Filled	Female	No
6316	6316	GG	Hourly	Account Clerk II - B&C	Retirement	Filled	Female	Yes
6431	6387	GG	Salaried	Transit Fleet Supervisor	Retirement	Filled	Both	Yes
6602	6602	GG	Hourly	Fleet Mechanic 1 - RTS	Promotion of Incumbent	Filled	Female	No
6621	6523-A	GG	Hourly	Police Officer	Retirement	Filled	Minority	No
6707	6707	GG	Hourly	Staff Specialist	Promotion of Incumbent	Filled	Both	Yes
6719	6049	GG	Hourly	Records Technician	Transfer of Incumbent	Filled	Both	Yes
6734	6734	GG	Hourly	Traffic Signs and Markings Technician III	Retirement	Filled	Minority	Yes
6886	010-06886	GRU	Salaried	Utility Project / Team Leader	Promotion of Incumbent	Filled	Minority	Yes
6914	010-06908	GRU	Hourly	Accelerated Production Operator Trainee	Promotion of Incumbent	Filled	Female	No
6959	010-06959	GRU	Salaried	Work & Resource Management Manager	Promotion of Incumbent	Filled	Both	No
7016	7016	GG	Salaried	Transit Planning Assistant	Separation of Incumbent	Filled	Female	Yes
7045	010-07045	GRU	Hourly	Customer Service Representative	Promotion of Incumbent	Filled	Female	Yes
7351	010-07278	GRU	Hourly	Customer Service Representative II	Promotion of Incumbent	Filled	Female	Yes
7375	010-07224	GRU	Salaried	Infrastructure Operations Professional	Separation of Incumbent	Filled	Both	No
7557	7557	GG	Salaried	Technical Systems Analyst, Sr.	Promotion of Incumbent	Filled	Female	No
7617	7004	GG	Hourly	Technical Support Specialist III	Separation of Incumbent	Filled	Minority	No
7635	7635	GG	Hourly	Cemetery Coordinator	Separation of Incumbent	Filled	Both	Yes
7650	010-07642	GRU	Hourly	Customer Service Representative II	Separation of Incumbent	Filled	Female	Yes
7656	010-07656	GRU	Hourly	Water/Wastewater Engineering Staff Assistant	Promotion of Incumbent	Filled	Minority	No
7703	010-07703	GRU	Salaried	Chief Financial Officer, Utilities	Separation of Incumbent	Filled	Female	Yes
7732	010-07134	GRU	Hourly	Meter Reader	Promotion of Incumbent	Filled	Both	Yes

The following tables provide a view of the base demographics of the ‘hired’ population (i.e., Gender and Ethnicity) for each position within the sample set. The data used to yield the statistics below was provided by HR as direct data extract from HR Tracking Software, NeoGov. Other facts and figures are provided for additional contextual comparison. The AAP Goal is highlighted to show hiring performance against the planned AAP metric. **Green** = ‘Goal Met’. **Yellow** = ‘Goal Not Met’. If the goal was noted as ‘Both’, then either hiring a minority or female satisfies the AAP goal.

When counting ‘minority applicants’, the AAP goal determines if the count will include ethnic minorities only or Female applicants as well. For AAP goal of ‘Minority’, only ethnic minorities are counted. For AAP goal of ‘Female’, only female applicants are counted as the minority entity. For AAP Goal of ‘Both’, female and ethnic minority groups are counted as the combined minority entity.

The EEOC defines minority as the smaller part of a group. A group within a country or state that differs in race, religion or national origin from the dominant group. According to EEOC guidelines, minority is used to mean four particular groups who share a race, color or national origin. These groups are:

Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino): A person having origins in any of the peoples of Hawaii, Guam, Samoa or other Pacific Islands.

American Indian or Alaskan Native: A person having origins in any of the original peoples of North America and South America (including Central America), and who maintain tribal affiliation or community attachment.

Asian (Not Hispanic or Latino): A person having origins in any of the original people of the Far East, Southeast Asia, or the Indian Subcontinent, including, but not limited to, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.

Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

Black or African American (Not Hispanic or Latino): A person having origins in any of the black racial groups of Africa.

Of course, many more minority groups can be identified in the American population. However, they are not classified separately as minorities under EEO law. It should be noted that women are not classified as a minority. However, they have experienced the same kind of systematic exclusion from the economy as the various minorities. Thus, they are considered as having "minority status" as far as the law is concerned.

Table 2

PRAF	5377
Exam #	04341C
Exam Plan	Firefighter - Certified
Class Title	Firefighter (52 hours)
AAP Goal	Minority
Gender	Ethnicity
M	Asian (Not Hispanic or Latino)
M	Asian and White Non-Hispanic
M	Black and White Not Hispanic
M	Black or African American (Not Hispanic or Latino)
M	Other
M	Other
M	Prefer Not to Disclose
M	Prefer Not to Disclose
M	Prefer Not to Disclose
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **52** | Male: **50** | Female: **2** | Minority Applicants: **7**
Hired Minority Applicants: **4** | Hired Females: **0**
Ratio Total Hired (12) to Total Applicants (52): **23%**
Ratio of Hired Minorities (4) to Total Hired (12): **33%**

Table 3

PRAF	6195
Exam #	5946
Exam Plan	Building Inspector
Class Title	Inspector 4
AAP Goal	Both
Gender	Ethnicity
M	Other – Hispanic or Latino
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **82** | Male: **73** | Female: **9** | Minority Applicants: **19**
Hired Minority Applicants: **1** | Hired Females: **0**
Ratio Total Hired (5) to Total Applicants (82): **6%**
Ratio of Hired Minorities (1) to Total Hired (5): **20%**

Table 4

PRAF	6313
Exam #	010-06313
Exam Plan	Energy Delivery Planner
Class Title	Energy Delivery Planner
AAP Goal	Female
Gender	Ethnicity
M	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **9** | Male: **9** | Female: **0** | Minority Applicants: **0**

Hired Minority Applicants: **0** | Hired Females: **0**

Ratio Total Hired (1) to Total Applicants (9): **11%**

Ratio of Hired Minorities (0) to Total Hired (1): **0%**

Table 5

PRAF	6316
Exam #	6316
Exam Plan	Account Clerk II - B&C
Class Title	Account Clerk II
AAP Goal	Female
Gender	Ethnicity
F	Black or African American (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **87** | Male: **24** | Female: **63** | Minority Applicants: **63**

Hired Minority Applicants: **1** | Hired Females: **1**

Ratio Total Hired (1) to Total Applicants (87): **1%**

Ratio of Hired Minorities (1) to Total Hired (1): **100%**

Table 6

PRAF	6431
Exam #	6387
Exam Plan	Transit Fleet Supervisor
Class Title	Transit Fleet Supervisor
AAP Goal	Both
Gender	Ethnicity
M	American Indian Alaskan Native and White Non-Hispanic
M	Black or African American (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **43** | Male: **40** | Female: **3** | Minority Applicants: **15**

Hired Minority Applicants: **2** | Hired Females: **0**

Ratio Total Hired (2) to Total Applicants (43): **5%**

Ratio of Hired Minorities (2) to Total Hired (2): **100%**

Table 7

PRAF	6602
Exam #	6602
Exam Plan	Fleet Mechanic 1-RTS
Class Title	Fleet Mechanic I RTS
AAP Goal	Female
Gender	Ethnicity
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **16** | Male: **16** | Female: **0** | Minority Applicants: **0**

Hired Minority Applicants: **0** | Hired Females: **0**

Ratio Total Hired (2) to Total Applicants (16): **13%**

Ratio of Hired Minorities (0) to Total Hired (2): **0%**

Table 8

PRAF	6621
Exam #	6523-A
Exam Plan	Police Officer
Class Title	Police Officer
AAP Goal	Minority
Gender	Ethnicity
N/A	- There were no Hires for this posting at the time

Other Statistics:

Total Applicants: **272** | Male: **201** | Female: **71** | Minority Applicants: **102**

Hired Minority Applicants: **0** | Hired Females: **0**

Ratio Total Hired (0) to Total Applicants (272): **0%**

Ratio of Hired Minorities (0) to Total Hired (0): **0%**

Table 9

PRAF	6707
Exam #	6707
Exam Plan	Staff Specialist
Class Title	Staff Specialist
AAP Goal	Both
Gender	Ethnicity
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **83** | Male: **18** | Female: **63** | Other Gender: **2** | Minority Applicants: **74**

Hired Minority Applicants: **1** | Hired Females: **1**

Ratio Total Hired (1) to Total Applicants (83): **1%**

Ratio of Hired Minorities (1) to Total Hired (1): **100%**

Table 10

PRAF	6719
Exam #	6049
Exam Plan	Records Technician
Class Title	Records Technician
AAP Goal	Both
Gender	Ethnicity
F	Black or African American (Not Hispanic or Latino)
F	White and Hispanic

Other Statistics:

Total Applicants: **204** | Male: **53** | Female: **149** | Other Gender: **2** | Minority Applicants: **167**

Hired Minority Applicants: **2** | Hired Females: **2**

Ratio Total Hired (2) to Total Applicants (204): **1%**

Ratio of Hired Minorities (2) to Total Hired (2): **100%**

Table 11

PRAF	6734
Exam #	6734
Exam Plan	TRAFFIC SIGNS AND MARKINGS TECHNICIAN III
Class Title	Traffic Signs/Markings Technician 3
AAP Goal	Minority
Gender	Ethnicity
M	Black or African American (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **22** | Male: **21** | Female: **1** | Minority Applicants: **10**

Hired Minority Applicants: **1** | Hired Females: **0**

Ratio Total Hired (1) to Total Applicants (22): **5%**

Ratio of Hired Minorities (1) to Total Hired (1): **100%**

Table 12

PRAF	6886
Exam #	010-06886
Exam Plan	Utility Project / Team Leader
Class Title	Utility Project Team Leader III
AAP Goal	Minority
Gender	Ethnicity
M	Asian (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **21** | Male: **16** | Female: **4** | Other Gender: **1** | Minority Applicants: **4**

Hired Minority Applicants: **1** | Hired Females: **0**

Ratio Total Hired (1) to Total Applicants (21): **5%**

Ratio of Hired Minorities (1) to Total Hired (1): **100%**

Table 13

PRAF	6914
Exam #	010-06908
Exam Plan	Accelerated Production Operator Trainee
Class Title	Accelerated Production Operator Trainee
AAP Goal	Female
Gender	Ethnicity
M	Black or African American (Not Hispanic or Latino)
M	Black or African American (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)
M	White and Hispanic

Other Statistics:

Total Applicants: **178** | Male: **159** | Female: **19** | Minority Applicants: **19**

Hired Minority Applicants: **0** | Hired Females: **0**

Ratio Total Hired (5) to Total Applicants (178): **3%**

Ratio of Hired Minorities (0) to Total Hired (5): **0%**

Table 14

PRAF	6959
Exam #	010-06959
Exam Plan	Work & Resource Management Manager
Class Title	Work & Resource Management, Manager
AAP Goal	Both
Gender	Ethnicity
M	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **15** | Male: **14** | Female: **1** | Minority Applicants: **2**

Hired Minority Applicants: **0** | Hired Females: **0**

Ratio Total Hired (1) to Total Applicants (15): **7%**

Ratio of Hired Minorities (0) to Total Hired (1): **0%**

Table 15

PRAF	7016
Exam #	7016
Exam Plan	Transit Planning Assistant
Class Title	Transit Planning Assistant
AAP Goal	Female
Gender	Ethnicity
M	Black or African American (Not Hispanic or Latino)
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **37** | Male: **22** | Female: **15** | Minority Applicants: **15**

Hired Minority Applicants: **1** | Hired Females: **1**

Ratio Total Hired (2) to Total Applicants (37): **5%**

Ratio of Hired Minorities (1) to Total Hired (2): **50%**

Table 16

PRAF	7045
Exam #	010-07045
Exam Plan	Customer Service Representative II Opportunities
Class Title	Customer Service Rep 2
AAP Goal	Female
Gender	Ethnicity
M	Black or African American (Not Hispanic or Latino)
M	Black or African American (Not Hispanic or Latino)
F	Black or African American (Not Hispanic or Latino)
F	White (Not Hispanic or Latino)
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **240** | Male: **66** | Female: **172** | Other Gender: **2** | Minority Applicants: **172**

Hired Minority Applicants: **3** | Hired Females: **3**

Ratio Total Hired (5) to Total Applicants (240): **2%**

Ratio of Hired Minorities (3) to Total Hired (5): **60%**

Table 17

PRAF	7351
Exam #	010-07278
Exam Plan	Customer Service Representative II
Class Title	Customer Service Rep 2
AAP Goal	Female
Gender	Ethnicity
F	Black or African American (Not Hispanic or Latino)
F	Black or African American (Not Hispanic or Latino)
F	White (Not Hispanic or Latino)
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **169** | Male: **33** | Female: **134** | Other Gender: **2** | Minority Applicants: **134**

Hired Minority Applicants: **4** | Hired Females: **4**

Ratio Total Hired (4) to Total Applicants (169): **2%**

Ratio of Hired Minorities (4) to Total Hired (4): **100%**

Table 18

PRAF	7375
Exam #	010-07224
Exam Plan	Infrastructure Operations Professional
Class Title	IT Infrastructure Designer and Administrator Senior
AAP Goal	Both
Gender	Ethnicity
M	White (Not Hispanic or Latino)
M	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **13** | Male: **12** | Female: **1** | Minority Applicants: **3**

Hired Minority Applicants: **0** | Hired Females: **0**

Ratio Total Hired (2) to Total Applicants (13): **15%**

Ratio of Hired Minorities (0) to Total Hired (2): **0%**

Table 19

PRAF	7557
Exam #	7557
Exam Plan	Technical Systems Analyst, Sr.
Class Title	Technical Systems Analyst, Sr.
AAP Goal	Female
Gender	Ethnicity
M	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **35** | Male: **33** | Female: **2** | Minority Applicants: **2**

Hired Minority Applicants: **0** | Hired Females: **0**

Ratio Total Hired (1) to Total Applicants (35): **3%**

Ratio of Hired Minorities (0) to Total Hired (1): **0%**

Table 20

PRAF	7617
Exam #	7004
Exam Plan	Technical Support Specialist III
Class Title	Technical Support Specialist III
AAP Goal	Minority
Gender	Ethnicity
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **41** | Male: **31** | Female: **9** | Other Gender: **1** | Minority Applicants: **14**

Hired Minority Applicants: **0** | Hired Females: **1**

Ratio Total Hired (1) to Total Applicants (41): **2%**

Ratio of Hired Minorities (0) to Total Hired (1): **0%**

Table 21

PRAF	7635
Exam #	7635
Exam Plan	Cemetery Coordinator
Class Title	Cemetery Coordinator
AAP Goal	Both
Gender	Ethnicity
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **152** | Male: **61** | Female: **91** | Minority Applicants: **107**

Hired Minority Applicants: **1** | Hired Females: **1**

Ratio Total Hired (1) to Total Applicants (152): **< 1%**

Ratio of Hired Minorities (1) to Total Hired (1): **100%**

Table 22

PRAF	7650
Exam #	010-07642
Exam Plan	Customer Service Representative Opportunities
Class Title	Customer Service Rep 2
AAP Goal	Female
Gender	Ethnicity
F	Black or African American (Not Hispanic or Latino)
F	Black or African American (Not Hispanic or Latino)
M	Black or African American (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **237** | Male: **72** | Female: **162** | Other Gender: **3** | Minority Applicants: **162**

Hired Minority Applicants: **2** | Hired Females: **2**

Ratio Total Hired (3) to Total Applicants (237): **1%**

Ratio of Hired Minorities (2) to Total Hired (3): **66%**

Table 23

PRAF	7656
Exam #	010-07656
Exam Plan	Staff Assistant (Water/Wastewater Engineering)
Class Title	Staff Assistant
AAP Goal	Minority
Gender	Ethnicity
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **59** | Male: **9** | Female: **50** | Minority Applicants: **18**

Hired Minority Applicants: **0** | Hired Females: **1**

Ratio Total Hired (1) to Total Applicants (59): **2%**

Ratio of Hired Minorities (0) to Total Hired (1): **0%**

Table 24

PRAF	7703
Exam #	010-07703
Exam Plan	Chief Financial Officer, Utilities
Class Title	Chief Financial Officer, Utilities
AAP Goal	Female
Gender	Ethnicity
F	White (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **33** | Male: **21** | Female: **9** | Other Gender: **3** | Minority Applicants: **9**

Hired Minority Applicants: **1** | Hired Females: **1**

Ratio Total Hired (1) to Total Applicants (33): **3%**

Ratio of Hired Minorities (1) to Total Hired (1): **100%**

Table 25

PRAF	7732
Exam #	010-07134
Exam Plan	Meter Reader
Class Title	Meter Reader
AAP Goal	Both
Gender	Ethnicity
M	Black or African American (Not Hispanic or Latino)

Other Statistics:

Total Applicants: **206** | Male: **168** | Female: **35** | Other Gender: **3** | Minority Applicants: **102**

Hired Minority Applicants: **1** | Hired Females: **0**

Ratio Total Hired (1) to Total Applicants (206): **< 1%**

Ratio of Hired Minorities (1) to Total Hired (1): **100%**

OBSERVATIONS, CONCLUSIONS, AND OPPORTUNITIES

Per review of OEO and HR documentation and interviews of key OEO and HR representation, it is determined that the City, in conjunction with its constituency of engaged citizens, continues to operate in good faith to uphold the mission set forth by its policy statements. The will of the people by due process determined that the EO Director should be deemed a Charter Officer reporting directly to the City Commission. The following observations and conclusion are offered:

- In the original RFQ the defined scope was provided as follows: (April 2019)

Calendar year 2017, Gainesville Regional Utilities hired approximately 90 new employees, of which 45 had an Affirmative Action Plan goal in place; Total Employees: 928

Calendar year 2017, General Government of the City of Gainesville hired approximately 365 new employees, of which 110 had an Affirmative Action Plan goal in place; Total Employees: 1,342

Total Employees w/ AAP goal: 155

Total Employees: 2,270

Human Resources was not successful in reproducing the above data points during on-site visits. At the direction of the Interim City Auditor in July 2019, we leveraged data from NeoGov (Postings with an AAP goal) to build the agreed calculated sample size. We combined data from calendar years 2017 and 2018 postings with an AAP goal and obtained the following information:

1. Combine 2017 and 2018 posting population (156+142=298 with goals);
 2. Sample the 298 (based on my ACL random sampling size calculation for 90% confidence level, 10% upper error, 0 expected error, the sample size is 24)
- There were discoverable interview notes for the majority of the selected PRAFs. The process of requesting and reviewing interview information through Iron Mountain is not a sustainable performance review practice. Thought should be given to implement a regular reporting/audit practices to eliminate the need to pull these physical paper records for periodic audit review.
 - The City of Gainesville is presently undergoing a new ERP implementation. The City should now consider how to better align the new ERP with universal EEO field and tabular nomenclature to help

promote standardization and eliminate human interpretation challenges, which greatly reduce efficiency in developing annual plans.

- As an example for the above, consideration should be given to properly designate ethnicity, hourly or salaried, etc. to assure accurate representation in developing AAP Plans.
- Also, persons having responsibility of data entry within the new system should be provided with standard requirements of documentation to eliminate variability within system records.

The City should consider the following opportunities for improvement:

1. Continue to leverage Berkshire – BalanceAAP software.
 - a. BalanceAAP is a secure, web-based application that enables internal creation of your technically compliant AAP. BalanceAAP affirmative action software contains all the features needed to fully manage compliance objectives. The software is also updated with the latest regulatory and census data as it is made available. The tool has extensive capability to automatically load company data, create multiple plans, track and monitor progress, and document good faith efforts.
 - b. Berkshire also provides their consultative services to facilitate enhanced performance management
2. Establish standard periodic review of AAP hiring goals, which are integrated as a part of HR data capture, management, and extraction.
 - a. Per interviews with OEO representation it is known that in prior years there were regular ‘Post Hiring Analysis Reports’ (PHAR), which facilitated a more systematic performance review against AAP goals. The process while in place was not followed regularly and eventually was discontinued.
 - b. Any consideration to reinstate such practice should keep in mind simplicity, reasonableness, relevance, and time limited periods of review.
3. Establish data governance practices, execution, and review to eliminate dependence on any person’s institutional knowledge to accurately produce foundation data used to build the plan.
 - a. To compile annual AAP’s requires a great deal of institutional knowledge by the present EEO Affirmative Action Manager to remove erroneous records and align to Federal EEO naming conventions (i.e. data cleansing and restructuring of nomenclature).
4. Implement regular reporting/audit practices to eliminate the need to pull these physical paper records for periodic audit review.
5. Review how to better align the new ERP with universal EEO field and tabular nomenclature to help eliminate standardization and human interpretation challenges.

GOVERNMENT AUDITING STANDARDS COMPLIANCE

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our observations and conclusions based on our audit objectives.



DATE: January 8, 2020

TO: Leonard Loria, Acting City Auditor

FROM: Teneeshia L. Marshall, Equal Opportunity Director

RE: OEO Response-Audit of the Affirmative Action Plan

Please find the below response to the Audit of the Office of Equal Opportunity's Affirmative Action Plan.

Recommendation #1

Continue to leverage the Berkshire AAP software.

Response:

The Office of Equal Opportunity concurs with this recommendation. Berkshire AAP software is and has been the software used by our office and we will continue to use their services.

Proposed Completion Date: N/A

Recommendation #2

Establish standard periodic review of AAP hiring goals, which are integrated as a part of HR data capture, management and extraction.

Response:

The Office of Equal Opportunity concurs with this recommendation. The OEO will reinstate the Post Hiring Analysis to review status of affirmative action goals on a quarterly basis. The office will work with Human Resources department on the generation of this report and what relevant data is needed.

It is also important to note that the City is undergoing a new ERP system that is set to launch in March 2020, which will determine how we receive data.

Proposed Completion Date: June 2020

Recommendation #3

Establish data governance practices, execution, and review to eliminate dependence on any person's institutional knowledge to accurately produce foundation data used to build the plan.

Response:

The Office of Equal Opportunity concurs with this recommendation. The Office has experienced challenges with data. The City is currently implementing a new ERP system and the office has worked with Human Resources on data and reports that are required by our office to complete the affirmative action plan. The Office of Equal Opportunity does not house data and traditionally, an affirmative action plan is housed within the Human Resources Department and monitored for compliance through an Equal Opportunity Office. Because this is unique in a sense that our office creates the goals, sets the plan and monitors the plan, the office is exploring using a 3rd party vendor to handle the affirmative action plan.

Proposed Completion Date: June 2020

Recommendation #4

Implement regular reporting/audit practices to eliminate the need to pull these physical paper records for periodic audit review.

Response:

The Office of Equal Opportunity concurs in part with this recommendation. The OEO can establish a regular audit plan to review files on a quarterly basis, however, because the office is not the custodian of the files that need reviewing, our office cannot establish any process that would eliminate the need to pull physical paper records. The Human Resources Department houses the files required to complete the affirmative action plan.

Proposed Completion Date: June 2020

Recommendation #5

Review how to better align the new ERP with universal field and tabular nomenclature to help promote standardization and eliminate human interpretation challenges.

Response:

The Office of Equal Opportunity concurs with this recommendation. During the ERP implementation, the OEO worked with Human Resources and shared data that the OEO uses to create the affirmative action plan. The purpose in sharing this data was to make report gathering more efficient. The new ERP system is set to launch in March 2020, at which time the OEO will be able to work with Human Resources to see if the reports meet the needs of the office. If not, the office will continue to work with HR on the reports.

Proposed Completion Date: June 2020

APPENDIX A – MANAGEMENT RESPONSE AND CORRECTIVE ACTION PLAN

We believe that management is in a unique position to best understand their operations and may be able to identify more innovative and effective approaches, and we encourage them to do so when providing responses to our recommendations.

Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
<i>Recommendations for City Management:</i>		
1. Continue to leverage the Berkshire BalanceAAP software.	The Office of Equal Opportunity concurs with this recommendation. Berkshire AAP software is and has been the software used by our office and we will continue to use their services.	N/A
2. Establish standard periodic review of AAP hiring goals, which are integrated as a part of HR data capture, management, and extraction.	<p>The Office of Equal Opportunity concurs with this recommendation. The OEO will reinstate the Post Hiring Analysis to review status of affirmative action goals on a quarterly basis. The office will work with Human Resources department on the generation of this report and what relevant data is needed.</p> <p>It is also important to note that the City is undergoing a new ERP system that is set to launch in March 2020, which will determine how we receive data.</p>	June 2020
3. Establish data governance practices, execution, and review to eliminate dependence on any person's institutional knowledge to accurately produce foundation data used to build the plan.	The Office of Equal Opportunity concurs with this recommendation. The Office has experienced challenges with data. The City is currently implementing a new ERP system and the office has worked with Human Resources on data and reports that are required by our office to complete the affirmative action plan. The Office of Equal Opportunity does not house data and traditionally, an affirmative action plan is housed within the Human Resources Department and monitored for compliance through an Equal Opportunity Office. Because this is unique in a sense that our office creates the goals, sets the plan and monitors the plan, the office is exploring using a 3rd party vendor to handle the affirmative action plan.	June 2020

APPENDIX A – MANAGEMENT RESPONSE AND CORRECTIVE ACTION PLAN

Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
4. Implement regular reporting/audit practices to eliminate the need to pull these physical paper records for periodic audit review.	The Office of Equal Opportunity concurs in part with this recommendation. The OEO can establish a regular audit plan to review files on a quarterly basis, however, because the office is not the custodian of the files that need reviewing, our office cannot establish any process that would eliminate the need to pull physical paper records. The Human Resources Department houses the files required to complete the affirmative action plan.	June 2020
5. Review how to better align the new ERP with universal EEO field and tabular nomenclature to help promote standardization and eliminate human interpretation challenges.	The Office of Equal Opportunity concurs with this recommendation. During the ERP implementation, the OEO worked with Human Resources and shared data that the OEO uses to create the affirmative action plan. The purpose in sharing this data was to make report gathering more efficient. The new ERP system is set to launch in March 2020, at which time the OEO will be able to work with Human Resources to see if the reports meet the needs of the office. If not, the office will continue to work with HR on the reports.	June 2020