

AFFIRMATIVE ACTION PROGRAM
FOR PROTECTED
VETERANS

City of Portland

Portland, OR

January 1, 2023 through December 31, 2023

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Preface

The City of Portland, (also referred to as the City), is committed to the concept and practice of equal opportunity and affirmative action. In the preparation of this affirmative action program (AAP), we have been guided by the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002 (38 U.S.C. § 4212), and its implementing OFCCP regulations (41 C.F.R. Part 60-300). Nothing contained in this AAP or its supporting data should be construed as an admission by the City, in whole or in part, that it has contravened any federal, state, or local employment practice laws, or to sanction the discriminatory treatment of any person.

While the City firmly believes in dissemination of its affirmative action policies and equal employment opportunity practices and makes the non-data components of this AAP available for review to employees and applicants upon request, the AAP remains a proprietary document of the City. Moreover, the data on which the City has relied in preparing this AAP are confidential and sensitive, and the City believes release of the data would subject the City to commercial harm. Reports that require specific data, such as names of employees and salary information, are not an official part of this AAP. This information is on file at the City as Documentation and Supporting Data for AAP Reports, and is available for review only as required by law.

If this AAP or any supporting data or documentation are submitted to the Office of Federal Contract Compliance Programs (OFCCP) pursuant to the Executive Order, the Rehabilitation Act, the Vietnam Era Veterans' Readjustment Assistance Act and/or any implementing regulations (as any or all have been or may be amended), the Equal Employment Opportunity Commission, any local or state fair employment practice agency, or any other federal, state or local government agency, those documents and the information they contain are to be considered confidential and not subject to disclosure without notifying the City of the agency's decision to disclose and providing the City with ample time to contest the disclosure. Advance notice of disclosure should be sent to Affirmative Action Officer, Tiffani Penson. The City requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552.

No information contained in the AAP or any supporting data or documentation is to be copied, removed from the premises, or released to other individuals without a prior notification to and permission from the City.

This AAP does not constitute an express or implied contract between the City and its employees, job applicants, or other persons, nor does it change in any way the basic at will employment relationship all City employees have with the City. Nothing in this AAP creates a private right of action on behalf of any individual or group against the City.

Equal Employment Opportunity & Affirmative Action Statement of Policy

To further its goal of equal employment opportunity for all employees and prospective employees without regard to race, color, religion, sex, age, disability, sexual orientation, gender identity, veteran status, national origin, or any other characteristic protected by applicable law, the City of Portland states as its policy the following:

It is the policy of the City of Portland not to discriminate or allow the harassment of employees or applicants on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law with regard to any employment practices, including recruitment, advertising, job application procedures, hiring, upgrading, training, promotion, transfer, compensation, job assignments, benefits, and/or other terms, conditions, or privileges of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job. This policy applies to all jobs at the City. The City will continue to ensure that individuals are employed, and that employees are treated during employment, without regard to their sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law in all employment practices as follows:

Employment decisions at the City are based on legitimate job related criteria. All personnel actions or programs that affect qualified individuals, such as employment, upgrading, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination because of any basis protected by law. Employees may choose to voluntarily disclose their sex, race, national origin, disability and protected veteran status at any time by contacting Human Resources. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities and disabled veterans are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The City makes, and will continue to make, reasonable accommodations to the known physical or mental limitations of an otherwise qualified applicant or employee to promote the employment of qualified individuals with disabilities and disabled veterans, unless such accommodations would impose an undue hardship on the operations of the City's business.

The City of Portland, and our Mayor are fully committed to principals of equal employment opportunity and affirmative action. As Chief Human Resources Officer, I support the successful implementation of the City's Affirmative Action Programs. I have appointed the People & Culture Strategist as the Affirmative Action Officer for the City, with responsibility for implementation of the City's affirmative action activities. The Affirmative Action Officer has the full support of top management and the staff necessary to fully implement this Program. All managers and supervisors will take an active part in the City's AAP to ensure all qualified employees and prospective employees are considered and treated in a nondiscriminatory manner with respect to all employment decisions. Furthermore, the City of Portland will solicit the cooperation and support of all employees for the City's Equal Employment Opportunity and Affirmative Action Policy.

Our Affirmative Action Programs include an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of our Programs. The Affirmative Action Officer has been assigned responsibility for periodically reviewing progress in the compliance

and implementation of the policy of affirmative action. In accordance with public law, the City's program of affirmative action for qualified individuals with disabilities and the program of affirmative action for protected veterans are available for inspection in the Bureau of Human Resources, Monday through Friday, from 9:00 a.m. to 5:00 p.m. upon request.

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review or hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) of 1974, Executive Order 11246, all as amended, and/or any other federal, state, or local law or regulation regarding Equal Employment Opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations. The City of Portland will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

Cathy L. Bless
Cathy Bless, Chief Human Resources Officer

Definitions

41 C.F.R. 60-300.2

“DISABLED VETERAN” is (1) A veteran of the U.S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) A person who was discharged or released from active duty because of a service connected disability.

“QUALIFIED DISABLED VETERAN” means a disabled veteran as defined above who has the ability to perform the essential functions of the employment position at issue with or without reasonable accommodation.

“RECENTLY SEPARATED VETERAN” means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval or air service.

“ARMED FORCES SERVICE MEDAL VETERAN” is any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

“ACTIVE DUTY WARTIME OR CAMPAIGN BADGE VETERAN” means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

“PROTECTED VETERANS” means Disabled Veterans, Recently Separated Veterans, Armed Forces Service Medal Veterans, and Active Duty Wartime or Campaign Badge Veterans.

Responsibility for Implementation

41 C.F.R. 60-300.44(i)

The City of Portland has assigned primary management responsibility and accountability for ensuring full compliance with the Affirmative Action Program to Affirmative Action Officer, Tiffani Penson. The Affirmative Action Officer has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The identity of the Affirmative Action Officer appears on internal and external communications regarding the City's equal employment opportunity and affirmative action policies.

The duties of the Affirmative Action Officer and designees include:

- Developing policy statements, AAPs, and internal and external modes of communication
- Overseeing regular discussions with local managers, supervisors, and employees to ensure the City's policies are being followed
- Training personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the City's Affirmative Action Program are implemented
- Advising managers and supervisors the City is obligated to prevent discrimination and harassment of applicants and employees on any basis protected by law
- Identifying any problem areas in implementing the AAP, and developing solutions
- Ensuring policies are in place to identify any barriers to employment for protected veterans, including those with known disabilities, and assisting managers in developing reasonable accommodations to ensure disabled veterans benefit from equal employment opportunities
- Designing and implementing an internal audit and reporting system to measure the effectiveness of the City's Program, indicate the need for remedial action, determine the degree to which the City's objectives have been attained, determine whether employees who are protected veterans have had the opportunity to participate in City-sponsored educational, training, recreational, and social activities, and ensure each City location is in compliance with applicable laws and regulations
- Serving as liaison between the City and enforcement agencies, and between the City and organizations of and for protected veterans
- Encouraging active involvement by City representatives in the community service programs of local organizations of and for protected veterans
- Ensuring posters and notices are properly displayed or disseminated in ways that are accessible and understandable to applicants and employees and
- Keeping management informed of developments in the affirmative action area.

Request for Self-Identification

41 C.F.R. 60-300.42

In order to notify applicants and employees of the existence of and the opportunity to participate in this Affirmative Action Program and to provide sufficient data to allow the City of Portland to measure and improve, if necessary, the effectiveness of the City's affirmative action efforts, the City invites applicants and employees to voluntarily self-identify as a protected veteran as follows:

- When an applicant applies or is considered for employment, the City provides the applicant with an opportunity to voluntarily self-identify protected veteran status. This opportunity is offered at the same time the City invites the applicant to self-identify race, ethnicity, sex, and disability status.
- Following an offer of employment but before an individual begins working, the City provides an additional opportunity to voluntarily self-identify protected veteran status.
- The invitation to self-identify will state the City is a federal contractor required to take affirmative action to employ and advance in employment protected veterans, and summarize the relevant portions of the applicable law and the City's Affirmative Action Program.
- The invitation to self-identify will state the information is being requested on a voluntary basis, it will be kept confidential, refusal to provide the requested information will not subject the applicant to any adverse treatment, and the information will not be used in a manner that is inconsistent with applicable law.
- The City will keep all self-identification information confidential and maintains it in a data analysis file rather than in individual employee personnel or medical files.

Review of Personnel Processes

41 C.F.R. 60-300.44(b)

The City of Portland periodically reviews its personnel procedures to determine whether they ensure the careful, thorough, and systematic consideration of the job qualifications of employees or applicants who are protected veterans for jobs filled either by hiring or promotion and for educational or training opportunities.

Vacancies are advertised, and applications are accepted from any interested person. The City's employment materials, including items such as its employment application, the careers section of its website, and job advertisements, will include a non-discrimination statement to further inform applicants of the City's policy of equal employment opportunity. All non-executive positions lasting three days or more not expected to be filled from within will be referred to the appropriate state employment service delivery system. In addition, to ensure protected veterans are aware of job openings, the City will send vacancy announcements to the employment sources listed in this Affirmative Action Program.

The City ensures its personnel processes do not limit, segregate, or classify an employee or applicant in a way that adversely affects employment opportunities or status because of status as a protected veteran. The City makes sure when a protected veteran is considered for an employment opportunity, the City relies only on that portion of the individual's military record, including military discharge papers, relevant to the requirements of the opportunity at issue.

The City periodically reviews any physical and mental job qualifications to ensure they do not tend to screen out disabled veterans for reasons that are not job related or consistent with business necessity, or do not relate to ensuring the safe performance of the essential functions of the job. The City reviews its personnel processes to ensure protected veterans are not stereotyped in a manner that limits their access to jobs for which they are qualified. The City also ensures applicants and employees who are protected veterans and who meet job qualifications have equal access to its personnel processes, including those implemented through information and communication technologies, and provides necessary reasonable accommodation to ensure applicants and employees who are disabled veterans receive equal opportunity in the operation of personnel processes.

The Bureau of Human Resources supports and maintains the ADA accommodations request process. There is an accommodations section in all job postings. Recruiters receive requests for accommodations and pass the information along to Human Resources Business Partners who then follow up on the accommodation request and help make the determination and ensure the accommodation is provided. In the future, the Bureau of Human Resources plans to revamp its Bias Awareness Training for interview panelists to ensure it includes bias regarding veterans and people with disabilities.

Review of Physical and Mental Job Requirements

41 C.F.R. 60-300.44(c)

The City of Portland reviews physical and mental job qualification requirements as job qualification requirements are established or revised to ensure qualification requirements do not screen out qualified individuals with disabilities or qualified disabled veterans for reasons that are not job related or consistent with business necessity and the safe performance of the essential functions of the job. This review occurs at regular intervals throughout each calendar year, such as when a job may be advertised or filled through hiring or promotion, when the duties of a position are significantly revised, and when considering requests for reasonable accommodation related to the performance of the functions of the position.

The City also regularly reviews its personnel processes to ensure any medical exams or inquiries are conducted in accordance with the Section 503 regulations. Information regarding the medical condition or history of an individual obtained as a result of any such inquiry or exam is collected and maintained on separate forms and in separate medical files and treated as a confidential medical record.

To the extent any physical or mental job qualification measurements are found to potentially screen out qualified individuals with disabilities or qualified disabled veterans in the selection of employees or applicants for employment or in other changes in employment status such as promotion or training, the City will ensure the requirements are related to the specific job(s) for which the individual is being considered and are consistent with business necessity and the safe performance of the job.

The City of Portland organizes its work through a classification and compensation structure. The classification and compensation structure provides a consistent tool for categorizing and leveling the work performed on behalf of the City. The work performed within a specific classification is detailed in the class specification. This includes a summary statement, distinguishing characteristics between levels, general duties and responsibilities performed, and minimum qualifications to perform the work. Class specifications are reviewed on an ongoing basis to ensure the work is accurately outlined to include the required qualifications.

Most recently, the City conducted a citywide study of all of our non-represented classifications, which included a thorough review and redesign. The work of the City is further outlined in individual job specific descriptions by position. The position description provides a more detailed description of work performed by an individual employee.

The process for creating, classifying, or reclassifying positions within our structure requires a submission to our Classification and Compensation team. Analysts within that team review the detailed position description against our class specifications to determine the appropriate classification within the structure. With this process in place, we are able to thoroughly review work and ensure job requirements are appropriately described and consistent with the organizational need.

Reasonable Accommodations

41 C.F.R. 60-300.44(d)

The City of Portland has made and will continue to make reasonable accommodation to the known physical and mental limitations of otherwise qualified employees and job applicants who are disabled veterans unless such accommodation would impose an undue hardship.

If a veteran has a disability, the City encourages the individual to request reasonable accommodation to enable the individual to perform a job safely. Such accommodations may include special equipment, changes in the physical layout of the job, modification of job duties, or other reasonable accommodations. The City will inform employees and applicants of the process for requesting reasonable accommodation.

Where an employee who is known to be a veteran with a disability is having significant difficulty performing job duties and the City reasonably concludes the performance issues may be related to a known disability, the City may notify the employee of the performance problem and confidentially inquire whether the problem is related to the employee's disability. If the employee indicates a disability is impacting performance, the City will engage in confidential discussions with the employee about the performance problem and the need for reasonable accommodation.

Compensation

41 C.F.R. 60-300.21(i)

In offering employment or promotions, the City of Portland does not reduce the amount of compensation offered to protected veterans because of any disability income, pension, or other benefit the employee receives from another source. Similarly, the City does not reduce the amount of compensation offered to an employee or applicant because of the actual or anticipated cost of a reasonable accommodation needed, requested, or anticipated.

Harassment

41 C.F.R. 60-300.44(e)

The City of Portland has developed and implemented policies and procedures to ensure employees who are protected veterans are not harassed because of their veteran status.

A copy of the City's Equal Employment Opportunity and Affirmative Action Statement of Policy, which forbids harassment against individuals based on protected characteristics, is included in this AAP.

Training

41 C.F.R. 60-300.44(j)

The City of Portland trains personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the City's AAP are implemented.

All managers and supervisors are required to complete the following courses:

1. HR Administrative Rule 2.02 - Prohibition against workplace harassment, discrimination, and retaliation. Must be completed within 90 days of employment with a mandatory refresher every 3 years.
2. Administering the Discipline Process

The following classes are optional but highly recommended for all managers and supervisors:

1. Employee Lifecycle Training - Evaluates and addresses the role and impact of managers and supervisors in each stage of the employee lifecycle and includes a section on recruitment and selection data and covers AAP reporting
2. Reasonable Employment Accommodations Training

Internal Dissemination of Policy

41 C.F.R. 60-300.44(g)

The City of Portland recognizes that, however strong its outreach program, internal support from supervisory management and other employees is necessary to ensure maximum effectiveness of its AAP for protected veterans. The City may utilize the following procedures to enhance the internal implementation and dissemination of its Equal Employment Opportunity and Affirmative Action Statement of Policy, as appropriate:

- The City's Equal Employment Opportunity and Affirmative Action Statement of Policy will be made available to applicants and employees. The policy includes a statement that employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation under the Rehabilitation Act of 1973, as amended.
- An invitation to participate in the City's Affirmative Action Program by voluntarily self-identifying as a protected veteran will be disseminated to all applicants, as well as to all employees once the City has extended a job offer, but before beginning employment duties.
- The City will publicize the policy in City publications.
- The City will hold meetings with executive, management and supervisory personnel to explain the City's policy of affirmative action and to make clear the Mayor, City of Portland's support for the policy.
- The City will inform applicants and employees of its commitment to engage in affirmative action, including by discussing the policy in various employee and manager training sessions.
- When employees are featured in employee handbooks or similar publications, efforts will be made to include protected veterans.
- City publications will include articles on accomplishments of all employees, including protected veterans.

If the City has or becomes party to collective bargaining agreements, union officials will be informed the City is bound by the terms of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and is committed to take affirmative action to employ and advance in employment protected veterans, and the City will not discriminate against protected veterans. For those sites not subject to a collective bargaining agreement, no notification of union officials is necessary.

Outreach, Positive Recruitment and External Dissemination of Policy

41 C.F.R. 60-300.44(f)

The City of Portland has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment protected veterans. While the City believes there are no deficiencies in its current employment practices with respect to applicants and employees who are protected veterans, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing affirmative action efforts. The City engages in or has made plans to implement the activities outlined in this AAP, as appropriate.

The City will inform recruiting sources of the City of Portland's policy of affirmative action for protected veterans. Recruiting sources will be requested to actively recruit and refer qualified protected veterans for all positions.

The City will make the Equal Employment Opportunity Clause part of contracts and purchase orders.

The City will inform vendors and suppliers of its Equal Employment Opportunity and Affirmative Action Statement of Policy.

The City will post all job vacancies (other than some executive and senior management positions or positions lasting three days or less) for which it considers external applicants with the local employment delivery system where the opening occurs. These postings will occur before or concurrently with the use of other recruitment efforts to fill the job and will be provided in the manner and format specified by the relevant agency that will allow the agency to provide priority referral of protected veterans.

The City will notify the state employment service delivery system that it desires priority referrals of protected veterans for job openings. The City also will provide the employment service delivery system with the contact information for an employee who can answer questions about job listings. The notice also will include the names and contact information for job search organizations the City uses to assist in hiring, if any. If any of the information in this disclosure changes, the City will send an update with the next relevant job listing.

The City will identify local organizations and/or community agencies specializing in placing and/or developing training programs for protected veterans and send them notices of vacant positions. Examples of these outreach efforts include contacting the following:

- Local Veterans' Employment representatives in the Employment One-Stop CareerCenters near the facilities covered in this AAP, including WorkSource Oregon
- Department of Veterans Affairs offices close to the facilities covered in this AAP
- Placement or career offices of educational institutions specializing in the placement of protected veterans
- Private recruitment sources, such as professional organizations or employmentplacement services specializing in the placement of protected veterans, including Hiring our Heroes
- Local veterans' groups and veterans' service centers near the facilities covered in this AAP
- Department of Defense Transition Assistance Program (TAP) at Joint Base Lewis-McChord

Recruitment efforts at educational institutions may incorporate special efforts to reach students who are protected veterans.

Efforts will be made to have employees who are protected veterans serve as company representatives during career days, job fairs, and related recruitment efforts.

Advertisements or solicitations for prospective employees will indicate the City is an equal opportunity employer.

Assessment of Outreach and Recruitment Efforts

41 C.F.R. 60-300.44(f)(3)

The City of Portland evaluates available data regarding the effectiveness of its outreach and recruitment efforts on an annual basis. For areas where the City concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, the City will identify and implement alternative efforts.

The City will continue to monitor and review outreach sources to evaluate the effectiveness of outreach and recruitment efforts.

Criteria used to evaluate the effectiveness of outreach efforts may include:

- Results of hiring benchmark analysis for protected veterans
- Available data related to applicant and hires
- Whether the activity increased the City's ability to include protected veterans in its workforce
- Whether the activity attracted qualified protected veterans
- Whether the activity resulted in the selection of qualified protected veterans

The City of Portland participated in the following outreach programs from January 1, 2022 to December 21, 2022: Portland Veterans Hiring Fair and Stand Down event, Mt. Hood Community College Veterans Career Fair, Western Oregon University Veterans Career Fair.

The city will continue to monitor and review outreach sources to evaluate the effectiveness of outreach and recruitment efforts.

Audit and Reporting Systems

41 C.F.R. 60-300.44(h)

It is the responsibility of the City's Affirmative Action Officer to monitor employment and personnel practices to ensure compliance with applicable regulations and adherence to the City's Equal Employment Opportunity and Affirmative Action Statement of Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of the City of Portland's AAP.

The City's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the AAP
- Identify any need for remedial action
- Determine the degree to which the City's objectives are being attained
- Determine whether individuals who are known protected veterans have had the full opportunity to participate in all City sponsored educational, training, recreational and social activities
- Measure the City's compliance with the AAP's specific obligations, and
- Document the actions taken to monitor the City's compliance with the AAP's specific obligations.

To measure the effectiveness of the AAP, the City may take the following actions:

- Audit the City's voluntary self-identification process to monitor the number of protected veterans who choose to self-identify and evaluate whether changes could be made to the self-identification process to encourage greater voluntary self-identification by protected veterans
- Monitor records of applicant flow, referrals, placements, training, transfers, promotions, terminations, and compensation decisions to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained
- Report on the organization's progress towards equal employment opportunity and any identified problem areas so appropriate steps can be taken to resolve any issues
- Examine available utilization and benchmark data regarding protected individuals and develop action-oriented programs to address any areas of underutilization
- Review available data computations and analyses regarding applicants and hires
- Publish analytics on a quarterly basis depicting the demographics of qualified applicants and hires to increase transparency and accountability in hiring outcomes
- Review the effectiveness of the City's recruitment and outreach activities
- Use a schedule to regularly assess any mental and physical qualifications to ensure they are job-related and consistent with business necessity
- Regularly assess the City's personnel processes to ensure protected veterans have equal opportunity in employment
- Audit communications with vendors and subcontractors to ensure such communications reflect the City's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit communications with vendors to ensure such communications reflect the City's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit job listings to ensure the postings reflect the City's commitment to equal employment opportunity and affirmative action for protected veterans

- Audit personnel policies to ensure such policies reflect the City's commitment to equal employment opportunity and affirmative action for protected veterans

Where the Affirmative Action Program is found to be deficient, the City shall endeavor to undertake necessary action to improve the Program.

Data Collection Analysis

41 C.F.R. 60-300.44(k)

The City of Portland documents computations or comparisons pertaining to applicants and hires on an annual basis and maintains the documentation for a period of three years.

Hiring Benchmarks

41 C.F.R. 60-300.45

The City of Portland will establish a benchmark for hiring protected veterans. In establishing a hiring benchmark, the following principles apply:

- The purpose of establishing a hiring benchmark is to provide the City with a quantifiable method by which it can measure its progress toward achieving equal employment opportunity for protected veterans.
- The hiring benchmark is not a quota that must be met, nor is it a ceiling that limits or restricts the employment of protected veterans.
- In all employment decisions, the City makes selections in a nondiscriminatory manner. Hiring benchmarks do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, because of that individual's veteran status.
- Hiring benchmarks do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Hiring benchmarks are not used to supersede merit selection principles, nor do they require the City 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.
- A finding that the hiring benchmark has not been attained does not constitute a finding nor admission of discrimination.

The City of Portland has established its benchmark in accordance with the national percentage of veterans in the civilian labor force as published on the OFCCP website. As of January 01, 2023, this benchmark percentage is 5.5 percent.

Reports

Veterans Data Collection Analysis
For Period: 1/1/2022 to 12/31/2022

	Total
Number of Job Openings	2738
Number of Jobs Filled	2738
Number of Protected Veteran Applicants	833
Number of Applicants	19366
Number of Protected Veteran Hires	78
Number of Hired Applicants	1965

Confidential - Not subject to inspection by employees or applicants under 41 CFR Section 60-300.41.

Veterans Benchmarks for Hiring Analysis

For Period: 1/1/2022 to 12/31/2022

Hiring %	3.97
Benchmark %	5.60
Benchmark met?	No

Confidential - Not subject to Inspection by employees or applicants under 41 CFR Section 60-300.41.