



**The Honorable Maryellen O'Shaughnessy**  
**Franklin County Clerk of Courts**

Human Resources & Training  
373 South High Street, 23<sup>rd</sup> Floor  
Columbus, Ohio 43215  
614.525.3600

**Franklin County Clerk of Courts**  
**Equal Employment Opportunity Plan**

**1. PURPOSE**

The purpose of this plan is to assist the Franklin County Clerk of Courts in identifying possible barriers to opportunities within our employment practices, and, provides an outline for methods to remove identified barriers if any exist. The EEOP is the Clerk's continued commitment to welcoming diversity in the workplace and finding innovative methods to ensure equality within the work environment for our employees, applicants, and members of the public so that our employees reflect the community we serve.

**2. EQUAL EMPLOYMENT OPPORTUNITY STATEMENT**

The Franklin County Clerk of Courts is an equal opportunity employer and does not make employment decisions in a discriminatory manner based on race, color, religion, sex, national origin, age, sexual orientation, gender identity, disability that can be reasonably accommodated, veteran status, or genetic information. The Clerk complies with all applicable federal and state laws, rules, and regulations.

This policy prohibits discrimination based on any of the above-listed protected characteristics, and, retaliation against a person who opposes or complains about prohibited conduct, or participates in any way in the complaint, investigation, or reasonable accommodation processes.

This policy also prohibits the denial of reasonable accommodations that do not create undue hardship for disabilities and for religious beliefs.

The Clerk may discipline conduct that violates this policy even if the conduct does not violate a law prohibiting discrimination.

In addition, job applicants may review a copy of the EEOP for the Clerk and may contact the Department of Human Resources & Training if clarification is needed.

**3. COMPLAINT PROCEDURE**

Human Resources & Training has full authority over the administration of the EEOP. A job applicant or employee who believes they have been discriminated against with regard to prospective or ongoing employment may contact their supervisor or Human Resources & Training. In order for a timely and accurate review of the circumstances, complaints should be made within thirty (30) calendar days from the date of the occurrence of the alleged discriminatory act. After filing, every reasonable attempt will be



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made to ensure the complaint process is conducted without undue delay. Complainants will be notified of the outcome of the review. Nothing herein shall be construed as implied or actual circumvention of any collective bargaining agreement or employee rights.

Job applicants, employees, or members of the public who would like additional information regarding this plan and/or would like to file a complaint of discrimination may do so by contacting Human Resources & Training at:

Phone: 614.525.2722  
Fax: 614.525.2724  
Address: Franklin County Clerk of Courts  
ATTN: Human Resources & Training  
373 S. High Street 23<sup>rd</sup> floor  
Columbus, OH 43215  
Email: [clct\\_hrt@franklincountyohio.gov](mailto:clct_hrt@franklincountyohio.gov)

#### 4. DESIGNATION OF RESPONSIBILITIES

##### Human Resources & Training:

- Evaluate all aspects of the employment process to identify areas where unequal impact on protected classes may exist and recommend appropriate action to Clerk Administration;
- Propose changes in programs and procedures designed to eliminate discriminatory practices regarding employment with the Clerk;
- Maintain essential EEO data;
- Ensure personnel involved in recruitment and hiring activities for the Clerk are issued copies of this plan and are annually trained and tested on the plan;
- Identify problem areas, construct proposals for solutions and methods of implementing corrective action with regard to area of responsibility;
- Keep abreast of changing federal, state and local laws and court decisions that occur in the field of equal employment opportunity;
- Act as liaison between the Clerk and organizations concerned with Equal Employment Opportunity;
- Provide information to aggrieved employees or applicants for employment who believe they have been discriminated against;
- Provide the receipt and summary of investigation to individual complaints of discrimination;



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- Attempt to resolve discrimination complaints informally if possible;
- Disseminate and post pertinent EEO materials;
- Coordinate employee training on EEO; and,
- Prepare reports on EEO progress for Clerk Administration.

### **Supervisors and Managers**

- Analyze policies, practices, and procedures within their area of responsibility for the purpose of reporting identified violations of Franklin County Clerk of Court's Employee Handbook and this plan to the Human Resources & Training;
- Disseminate any pertinent EEO materials to Franklin County Clerk of Court employees as directed; and
- Attend EEO training sessions and meetings as scheduled

### **Franklin County Clerk of Courts Employees**

- All employees are expected to treat others respectfully and equally as defined by federal and state law, regardless of the protected class status of an employee, applicant, or member of the public. In particular, they are required to adhere to the Franklin County Clerk of Court's Employee Handbook; and,
- All employees are expected to embrace diversity and inclusiveness in order to reflect the communities we serve and ensure that diversity contributes to the development of our mission and the common good in a changing society.

Employees covered by a bargaining unit may grieve an act of discrimination pursuant to the grievance procedure of the applicable collective bargaining agreement.

### **Discipline for Discriminatory Acts**

Violations of the Clerk's Employee Handbook, applicable rules, laws, or policies prohibiting discriminatory conduct may be addressed through disciplinary action, up to and including termination of employment. Any investigations and/or disciplinary action shall be completed in accordance with applicable collective bargaining agreement(s).



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### 5. RECRUITMENT

It is the goal of the Franklin County Clerk of Courts to recruit and hire qualified individuals. Human Resources & Training will ensure that all applicants have equal access to employment opportunities. This applies to all aspects of employment, such as hiring, promotions, terminations, discipline, performance evaluations, and interviews. Human Resources & Training will exercise due diligence to ensure prospective employees have the proper disposition, knowledge, capabilities, skills and abilities to accomplish the essential functions of the positions. Human Resources & Training will have appropriate mechanisms in place in order to achieve this goal. Further, Human Resources & Training shall ensure pre-employment requirements are job-related to the skills and abilities necessary for the position to be filled. Franklin County Clerk of Courts will continually strive for the creation and retention of a diverse workforce that reflects the community it serves.

A qualified individual with a disability may make a request for a reasonable accommodation at any point in the hiring process or during their employment by contacting Human Resources & Training.

#### Recruitment Plan

Job advertisements that show a preference for or discourage someone from applying for an position with the Clerk because of race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age (40 or older), disability, or genetic information are prohibited. Human Resources & Training will provide career opportunity awareness for qualified applicants using the following means:

- Using a variety of media options targeted to the community the Franklin County Clerk of Courts serves. These may include radio, newspapers, websites, or social media;
- Create and utilize recruitment programs targeting high school and college students (both traditional and non-traditional) interested in positions for employment with Franklin County Clerk of Courts;
- Job Fairs and Community Events/Meetings
- Form community partnerships to create avenues of recruitment;
- Ensure recruitment materials are available to accommodate ESL (English Second Language) groups; and,
- Other means of recruiting as opportunities arise.



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### **HIRING AND SELECTION**

The Franklin County Clerk of Courts prohibits any practice in hiring or selection that considers stereotypes and/or assumptions about an applicant's race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age (40 or older), disability, or genetic information. Pre-employment requirements will be necessary and job-related to the position for which the applicant applied. Interview questions will be pre-screened, applicant responses, and hiring/rejection decisions will be documented to ensure qualified applicants are treated equitably.

Where a qualified applicant or employee with a disability has made a request for an accommodation in the hiring process or position, Human Resources & Training will engage the applicant or employee in the interactive process to determine whether there is a reasonable accommodation.

### **Application Process**

In order to be considered for employment an application with the Franklin County Clerk of Courts must be filed. Applicants may be considered for similar or other positions they are qualified for based on a filed application. Human Resources & Training will review applications for completeness and to determine whether the applicant has the required knowledge, skills, experience or education required for the position to be filled.

Human Resources & Training will maintain voluntarily submitted answers to EEO questions during the application process separate from the application for employment. If provided, such information is not connected to the submitted application for employment. Such information will be used to analyze applicant pools and attrition through the hiring process and will enable Human Resources & Training to assess and measure the effectiveness of its recruitment plan and compliance with policies, regulations, and the federal and state laws that pertain to equal employment opportunities; and to make changes, when necessary to comply with policies, regulations, local, state, and federal laws.

### **Selection Process**

The selection process may include pre-employment tests, interviews, job-related demonstrations, and/or examinations to determine fitness for duty. Background investigations will be conducted on each employee prior to being hired. When necessary to comply with federal, state or local laws or rules, the facts and circumstances surrounding an applicant's background will be taken into account considering the job duties and responsibilities.



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Franklin County Clerk of Courts prohibits the exclusion of any applicant based on an applicant's lawfully defined protected class status.

**7. ANNUAL REVIEW**

Human Resources & Training and others as directed by the Chief Deputy, will conduct a continuing program of self-evaluation to ascertain whether any of our recruitment, employee selection or promotional policies (or lack thereof) directly or indirectly have the effect of denying equal employment opportunities.

This review shall include demographic-based data for applicants and new hires, applicant dynamics such as effectiveness of advertising, and new hire retention. Where areas for improvement are identified, the Human Resources & Training will create benchmarks for measuring success. This EEOP will be reviewed and updated periodically as needed to maintain compliance with federal, state or local laws or internal policies, rules and regulations.

Employees involved in recruitment and hiring activities will be required to review and demonstrate knowledge and understanding of the EEOP on an annual basis.

**8. RECORDKEEPING**

The Franklin County Clerk of Court’s Equal Employment Opportunity Plan and all records used in its preparation shall be kept on file and retained by Human Resources & Training for subsequent audit.

Plan Approved by:

*Ellen E. French*

11/13/2024

Ellen E. French, Director of Human Resources & Training  
Franklin County Clerk of Courts

Date

# EEO Utilization Report

## Organization Information

Name: Franklin County Clerk of Courts

City: Columbus

State: OH

Zip: 43215

Type: County/Municipal Government

Thu 11-07-2024 16:13:25 EST

## **Section 1: EEO Policy Statement**

### **Policy Statement:**

See Attachment.



## **Section 5: Narrative Interpretation of Data**

The Utilization Analysis Chart suggests the Clerk's Office has a statistically significant underrepresentation of White Males, specifically within the broad job category of Administrative Support (-13%). The analysis compared the Clerk's Office with the relevant labor market in Franklin County, Ohio. However, U.S. Census Bureau data shows that between 2010 and 2022, the Black (non-Hispanic) population had the most growth in Franklin County, increasing by 72,692. Conversely, the White (non-Hispanic) population grew at a much slower rate, increasing by only 7,341. This may partially explain why the relatively high underrepresentation of White Males may be occurring. In keeping with the Franklin County Clerk's Office's commitment to having a workforce that reflects the community it serves, we will examine our recruiting and hiring strategies to determine ways we can attract white males in the Administrative Support job category.

## **Section 6: Objectives and Steps**

- 1. Encourage White males to apply for vacancies in the Administrative Support job category.**
  - a. Human Resources & Training will begin to collect gender and race/national origin data voluntarily from applicants. With this data, Human Resources will determine if the issue begins at the recruiting or selection stage of hiring.
  - b. If Human Resources determines the deficiency to be in external white male applicants, it will make recommendations of ways to target this demographic in postings, job fairs, and other recruitment measures.
  - c. If Human Resources determines the deficiency in white male representation begins at the selection stage, it will create an education plan for all hiring managers on understanding and overcoming implicit bias.

## **Section 7: Dissemination Strategy: Internal**

1. Franklin County Clerk of Courts will post the EEO Utilization Report in the organization's central repository for documents relevant to all staff - the company documents section of the Human Resources Information System (HRIS).
2. Franklin County Clerk of Courts will post the EEO Utilization Report on its organizational intranet, in an area accessible to all staff.

## **Section 7: Dissemination Strategy: External**

1. Franklin County Clerk of Courts will place a link on the Clerk's website to the EEO Utilization Report.

**Utilization Analysis Chart**  
**Relevant Labor Market: Franklin County**  
**, Ohio**

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/Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races/Other
<b>Officials/Administrators</b>														
Workforce #/%	5/36%	0/0%	1/7%	0/0%	0/0%	0/0%	0/0%	6/43%	0/0%	2/14%	0/0%	0/0%	0/0%	0/0%
CLS #/%	55,850/47%	2,170/2%	5,775/5%	45/0%	2,515/2%	4/0%	910/1%	40,550/34%	1,160/1%	7,640/6%	100/0%	1,725/1%	4/0%	840/1%
Utilization #/%	-11%	-2%	2%	-0%	-2%	-0%	-1%	9%	-1%	8%	-0%	-1%	-0%	-1%
<b>Professionals</b>														
Workforce #/%	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN
CLS #/%	61,605/34%	2,030/1%	6,640/4%	60/0%	8,400/5%	20/0%	1,660/1%	79,660/44%	2,475/1%	10,090/6%	175/0%	5,375/3%	65/0%	2,050/1%
Utilization #/%	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN
<b>Technicians</b>														
Workforce #/%	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN
CLS #/%	18,530/35%	1,705/3%	5,155/10%	20/0%	1,440/3%	25/0%	525/1%	16,735/31%	1,155/2%	5,950/11%	40/0%	1,335/3%	0/0%	595/1%
Utilization #/%	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN
<b>Protective Services: Sworn</b>														
Workforce #/%	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN
CLS #/%	8,270/61%	130/1%	2,295/17%	10/0%	80/1%	0/0%	305/2%	1,425/11%	60/0%	850/6%	0/0%	45/0%	0/0%	90/1%
Utilization #/%	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN
<b>Protective Services: Non-sworn</b>														
Workforce #/%	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN
CLS #/%	320/37%	4/0%	40/5%	0/0%	0/0%	0/0%	95/11%	375/44%	0/0%	20/2%	0/0%	0/0%	0/0%	0/0%
Utilization #/%	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN
<b>Administrative Support</b>														
Workforce #/%	33/17%	1/1%	13/7%	0/0%	2/1%	0/0%	3/2%	79/41%	8/4%	47/25%	0/0%	2/1%	1/1%	2/1%
CLS #/%	52,350/30%	1,930/1%	11,070/6%	40/0%	2,235/1%	0/0%	1,750/1%	76,790/44%	3,145/2%	20,805/12%	90/0%	2,335/1%	25/0%	2,930/2%

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/Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races/Other
	%	%	%	%	%	%	%	%	%	%	%	%	%	%
Utilization #/%	-13%	-1%	0%	-0%	-0%	0%	1%	-2%	2%	13%	-0%	-0%	1%	-1%
<b>Skilled Craft</b>														
Workforce #/%	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN
CLS #/%	33,285/75%	3,430/8%	2,875/6%	90/0%	500/1%	0/0%	995/2%	2,305/5%	190/0%	595/1%	0/0%	300/1%	0/0%	110/0%
Utilization #/%	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN
<b>Service/Maintenance</b>														
Workforce #/%	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN	0/NaN
CLS #/%	60,820/36%	6,735/4%	23,875/14%	275/0%	2,790/2%	0/0%	3,275/2%	42,760/25%	4,735/3%	19,560/11%	55/0%	3,230/2%	15/0%	2,500/1%
Utilization #/%	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN	NaN

### Significant Underutilization 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/Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races/Other
<b>Administrative Support</b>	✓													

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 EEO Utilization Report.

I have reviewed the foregoing EEO Utilization Report and certify the accuracy of the reported workforce data and our organization's employment policies.

Ellen E. Jarama Director of HR+Training 11/7/2024  
[signature] [title] [date]

## EMPLOYMENT

### **NON-DISCRIMINATION AND ANTI-HARRASSMENT POLICY**

#### NON-DISCRIMINATION

The Clerk's Office is an equal opportunity employer and does not make employment decisions in a discriminatory manner based on race, color, religion, sex, national origin, age, sexual orientation, gender identity, disability that can be reasonably accommodated, veteran status, or genetic information. The Clerk's Office complies with all applicable federal and state laws, rules, and regulations.

This policy prohibits both discriminations based on any of the above-listed protected characteristics and also prohibits retaliation against a person who opposes or complains about prohibited conduct or who participates in any way in the complaint, investigation, or reasonable accommodation processes.

This policy also prohibits the denial of reasonable accommodations that do not create undue hardship for disabilities and for religious beliefs.

Employees may face discipline for conduct that violates this policy even if the conduct does not rise to the level of a legal violation.

#### ANTI-HARRASSMENT

The Clerk has a strict policy against any form of unlawful discriminatory harassment and prohibits such harassment by or against all employees, applicants, vendors, clients and visitors. It is the policy of the Clerk to provide a working atmosphere free from discriminatory insult, intimidation, and other forms of harassment.

#### DISCRIMINATORY HARASSMENT

Harassment based on age (40 years or older); sex (including sexual harassment, sexual orientation, and gender identity); color; race; national origin; ancestry; religious persuasion; pregnancy; a disability that can be reasonably accommodated; genetic information; veteran status; military status; or any other status protected by applicable law, is a violation of this policy. Harassment may be overt or subtle, but whatever form it takes – verbal, nonverbal, or physical – harassment is insulting and demeaning to the recipient and will not be tolerated in the workplace. Examples of harassment include but are not limited to verbal abuse; epithets, slurs, or jokes; graffiti (remarks written or drawn on walls or other structures); obscene gestures; and hazing.

## SEXUAL HARASSMENT

The Clerk maintains a strict policy prohibiting sexual harassment and prohibits such harassment in any form, including verbal and physical sexual harassment. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, or any other visual, verbal, or physical conduct of a sexual nature when:

- Submission to such conduct is made an explicit or implicit term or condition of employment;
- Submission or rejection of such conduct by an individual is used as a basis for an employment decision affecting such individual; or,
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

## RESPONSIBILITY OF MANAGERS AND SUPERVISORS

All members of management, which includes all managers, assistant managers and supervisors as well as senior staff, are responsible for ensuring that no discrimination or harassment occurs within the office. Upon receiving a complaint of discrimination or harassment or otherwise becoming aware of possible discrimination or harassment, all members of management must immediately report it to Human Resources & Training. Failure by management to report complaints may result in discipline up to and including termination.

## EMPLOYEE RECOURSE

If any employee believes that they or another person has been discriminated against or has been harassed in any form (sexual or other), they are urged to promptly notify their supervisor or manager or the Director of Human Resources & Training. If the accused discriminator or harasser is in your chain of command, contact the Director of Human Resources & Training directly. Individuals are strongly urged to put any complaints of discrimination or harassment in writing within 5-10 working days of the alleged discrimination or harassment in order to begin the investigation more quickly.

## INVESTIGATION PROCEDURE

The Director of Human Resources & Training will promptly initiate an impartial investigation. Any complaint or report received cannot be kept strictly confidential; however, information concerning allegations shall be managed discretely and communicated to others only as is necessary to investigate and take appropriate disciplinary action based upon the outcome of the investigation.

The Director of Human Resources & Training will notify the parties to the complaint of the determination and their options.

If a party to the complaint is dissatisfied with the outcome, they may submit a written appeal to the Chief Deputy Clerk within fourteen (14) calendar days of receipt of the determination.

Once the Chief Deputy Clerk receives an appeal, they will review the entire record of the complaint and make a final determination in ten (10) working days of receiving an appeal.

### POTENTIAL DISCIPLINE

An employee who is found to have engaged in discrimination or harassment will be subject to disciplinary action, up to and including termination. No adverse action will be taken against an employee who reports or complains of discrimination or harassment; however, reports made in bad faith may lead to disciplinary action, up to and including termination.

### QUESTIONS REGARDING HARASSMENT POLICY

If you have any questions concerning this policy, please contact Human Resources & Training.

## **APPOINTMENTS**

The proper authorities in the Clerk's Office will make an appointment to one of the types of positions as defined below:

- 1) Full-time Appointment:  
A full-time appointment may be granted contingent upon satisfactory job performance.
- 2) Temporary Full-time Appointment:  
This type of appointment rarely exceeds one year and does not include any benefits to the employee. Temporary full-time employees are only paid for actual hours worked. The appointment is made to fill a temporary position or a full-time position that is temporarily vacant. If an employee is full-time and works 1,560 hours in a twelve-month period, the employee should be offered healthcare pursuant to the Affordable Care Act.
- 3) Part-time Appointment:  
This type of appointment is made for a position that requires less than 60 work hours per pay period. Benefits are not included. Part-time employees are only paid for actual hours worked.

### CLASSIFICATION CHANGES

A classification change is an alteration in an employee's classification title which results in a promotion, demotion, or transfer. A promotion is a move to a position that is in a higher classification and higher pay range. Transfer is a lateral move in the same classification and the same pay range. Demotion is a move to a position that is in a lower classification and lower salary range. Lateral Classification Change is a move from one classification to another classification that