

**DEPARTMENT OF FINANCE & ADMINISTRATION  
OFFICE OF CRIMINAL JUSTICE PROGRAMS  
CIVIL RIGHTS COMPLIANCE ATTESTATION**

AGENCY: Rutherford County Government	
DATE: 2/28/2017	CONTRACT(S): 26694 and 26707
PERSON COMPLETING THE FORM: Sonya Stephenson	TITLE: HR Director

INSTRUCTIONS: Answer the questions below related to compliance with all civil rights statutes and laws.

- Complete all items on the form. Those items which do not apply to the grant should be marked NA.
- Civil Rights compliance relates to the entire agency not just the funded program/project.
- Sign the form and return by email to Lee Ann Smith, OCJP Assistant Director; Monitoring [Lee.Ann.Smith@tn.gov](mailto:Lee.Ann.Smith@tn.gov)

I. POLICIES AND PROCEDURES			
<i>Compliance Requirement</i>			
	Yes	No	NA
1. The agency has developed an Affirmative Action Plan or Equal Employment Opportunity Plan (EEOP).	X		
2. Has the EEOP plan been submitted to the Office for Civil Rights, U.S. Department of Justice? <i>(Only if required)</i>			X
3. The agency has completed and submitted an EEOP Certification form to the Office of Justice Programs, Office for Civil Rights for each grant. <i>(Required by all.) Go to: <a href="http://ojp.gov/about/ocr/eeop.htm">http://ojp.gov/about/ocr/eeop.htm</a></i>	X		
4. The agency has completed an ADA Self-Evaluation? <i>[Agencies are advised to regularly evaluate programs, activities and services for ADA compliance.]( <a href="http://www.ada.gov/2010_regs.htm">http://www.ada.gov/2010_regs.htm</a> )</i>	X		
5. Has the agency completed any assurances or Title VI Self-Evaluations?	X		
6. Notices of non-discrimination, including all applicable civil rights laws, are posted in conspicuous places available to employees and applicants?	X		
7. Are agency policies and procedures relevant to Civil Rights available for review including how to file a complaint?	X		

II. TRAINING AND STAFF RESPONSIBILITIES			
<i>Compliance Requirement</i>			
	Yes	No	NA
7. Does the agency provide and document training to staff on non-discriminatory issues and Title VI compliance? Date of most recent training: 2/16/17	X		
8. The project director has completed the OCJP Title VI training or an approved equivalent. Date of most recent training: 6/16/16	X		
9. Have there been any complaints of discrimination against the agency in the last 12 months?		X	

## II. TRAINING AND STAFF RESPONSIBILITIES

10. Have there been any findings of discrimination against the agency issued by a federal or state court or federal or state administrative agency on the grounds of race, color, religion, national origin, or sex in the last 12 months?		X	
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## III. LEP AND AGENCY PRACTICES

<i>Compliance Requirement</i>			
	Yes	No	NA
12. Does the agency have a documented process in place to ensure that LEP clients are provided meaningful access to services?	X		
13. Does the agency has a process in place for reaching out to the LEP community?	X		
14. If the agency conducts religious activities as part of its programs or services, does the agency do the following:  <u>yes</u> Provide services to everyone regardless of religion or religious belief.  <u>yes</u> Ensure that it does not use federal funds to conduct inherently religious activities, such as worship, religious instruction, or proselytization, and that such activities are kept separate in time or place from federally funded activities.  <u>yes</u> Ensure that participation in religious activities is voluntary for beneficiaries of federally funded programs.	X		
15. If the agency operates an education program or activity, has the agency taken the following actions:  <u>yes</u> Adopted grievance procedures that provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Title IX of the Education Amendments of 1972, found at 28 C.F.R. Part 54, which prohibit discrimination on the basis of sex.  <u>yes</u> Designated a person to coordinate compliance with the prohibitions against sex discrimination contained in 28 C.F.R. Part 54.  <u>yes</u> Notified applicants for admission and employment, employees, students, parents, and others that the subrecipient does not discriminate on the basis of sex in its educational programs or activities.	X		
16. If the subrecipient receives \$25,000 or more in federal financial assistance from DOJ and has fifty or more employees, has the subrecipient taken the following actions:  <u>yes</u> Designated a responsible employee to coordinate compliance with Section 504 (28 C.F.R. § 42.505(d)),  <u>yes</u> Adopted grievance procedures ( <i>id.</i> § 42.505(e)), and  <u>yes</u> Notified participants, beneficiaries, applicants, employees, and unions or professional organizations with collective bargaining agreements with the subrecipient, that it does not discriminate, either in employment or in the delivery of services or benefits, based on disability ( <i>id.</i> § 42.505 (f)).	X		

<b>III. LEP AND AGENCY PRACTICES</b>			

I certify the above information is correct to the best of my knowledge.

Signature: 

Title: 2/28/17

# EEO Utilization Report

## Organization Information

Rutherford County Sheriff's Office

Murfreesboro, TN 37130

## Step 1: Introductory Information

### Policy Statement:

It is the policy of Rutherford County to ensure that no person shall be excluded from participation in or be denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance on the grounds of race, color, sex, age, disability, or national origin.

Following File has been  
uploaded:TITL EviPolicy\_1209.pdf

## **Step 4b: Narrative of Interpretation**

According to Rutherford County's Utilization Analysis Chart, we are underrepresented by females in both our sworn officials and sworn officers. The sworn officials is behind 11% and sworn officers is behind 25%, per the relevant labor market for Rutherford County. While the utilization is not significantly behind in other categories, the county's analysis does reflect a negative trend for Hispanic males and black females in the sworn officer classification. Additionally, the county's analysis does reflect a slight negative trend for black males in the sworn officials classification.

## **Step 5: Objectives and Steps**

### **1. Promotion of Females in the Sworn Officials Classification**

- a. Rutherford County must strive to train and develop more females within the administrative functions of the organization.

### **2. Promotion of Black Males within the Administration Classification**

- a. Rutherford County must continue to ensure that all black males are trained and developed the same as other male counterparts.

### **3. Recruit and Retain Hispanic Males for Sworn Officer positions**

- a. Rutherford County must continue to advertise and recruit Hispanic males for certified officer positions.

### **4. Recruit and Retain Black Female Certified Officers**

- a. Rutherford County must continue to recruit and retain black female officers for certified officer roles.

## **Step 6: Internal Dissemination**

Rutherford County will distribute the EEO Utilization Report to the Sheriff, who will share within the chain of command.

## **Step 7: External Dissemination**

The Rutherford County Sheriff's Office will post the EEO Utilization Report on their official website for public view.

**Utilization Analysis Chart**  
**Relevant Labor Market: Rutherford County, Tennessee**

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 #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	6,080/56 %	70/1%	400/4%	15/0%	260/2%	0/0%	60/1%	20/0%	3,315/31 %	94/1%	390/4%	0/0%	110/1%	0/0%	0/0%	30/0%
Utilization #/%																
<b>Professionals</b>																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	5,350/33 %	240/1%	520/3%	15/0%	255/2%	0/0%	70/0%	45/0%	8,100/50 %	245/2%	940/6%	4/0%	225/1%	0/0%	35/0%	35/0%
Utilization #/%																
<b>Technicians</b>																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	1,115/35 %	75/2%	125/4%	0/0%	85/3%	0/0%	10/0%	0/0%	1,535/48 %	20/1%	200/6%	0/0%	25/1%	0/0%	35/1%	0/0%
Utilization #/%																
<b>Protective Services: Sworn-Officials</b>																
Workforce #/%	63/89%	0/0%	2/3%	0/0%	0/0%	0/0%	0/0%	0/0%	5/7%	1/1%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
CLS #/%	1,170/64 %	30/2%	180/10%	0/0%	35/2%	0/0%	30/2%	0/0%	325/18%	0/0%	65/4%	0/0%	0/0%	0/0%	0/0%	0/0%
Utilization #/%	25%	-2%	-7%	0%	-2%	0%	-2%	0%	-11%	1%	-4%	0%	0%	0%	0%	0%
<b>Protective Services: Sworn-Patrol Officers</b>																
Workforce #/%	126/80%	2/1%	16/10%	0/0%	0/0%	0/0%	0/0%	1/1%	11/7%	0/0%	1/1%	0/0%	0/0%	0/0%	0/0%	0/0%
Civilian Labor Force #/%	5,420/40 %	965/7%	750/6%	80/1%	270/2%	0/0%	135/1%	25/0%	4,245/32 %	500/4%	865/6%	0/0%	195/1%	0/0%	4/0%	10/0%
Utilization #/%	40%	-6%	5%	-1%	-2%	0%	-1%	0%	-25%	-4%	-6%	0%	-1%	0%	-0%	-0%
<b>Protective Services: Non-sworn</b>																

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
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	15/20%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	60/80%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
Utilization #/%																
<b>Administrative Support</b>																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	8,815/31%	280/1%	1,225/4%	15/0%	250/1%	0/0%	69/0%	30/0%	14,725/52%	455/2%	1,965/7%	70/0%	295/1%	0/0%	165/1%	0/0%
Utilization #/%																
<b>Skilled Craft</b>																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	8,400/75%	1,305/12%	490/4%	0/0%	295/3%	0/0%	70/1%	0/0%	405/4%	55/0%	65/1%	0/0%	80/1%	0/0%	15/0%	0/0%
Utilization #/%																
<b>Service/Maintenance</b>																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/
CLS #/%	15,070/44%	2,140/6%	3,580/10%	0/0%	695/2%	30/0%	149/0%	10/0%	8,445/25%	1,270/4%	1,995/6%	20/0%	665/2%	0/0%	20/0%	15/0%
Utilization #/%																



### Significant Underutilization Chart

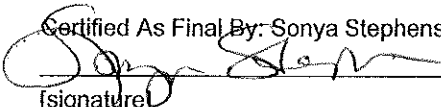
Job Categories	Male						Female									
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
Protective Services: Sworn-Officials									✓							
Protective Services: Sworn-Patrol Officers		✓							✓	✓	✓					

### Law Enforcement Category Rank Chart

Job Categories	Male						Female									
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	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>Sheriff</b>																
Workforce #/%	1/100%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Chief Deputy</b>																
Workforce #/%	1/50%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	1/50%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Deputy Chief</b>																
Workforce #/%	1/100%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Major</b>																
Workforce #/%	3/100%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Captain</b>																
Workforce #/%	5/100%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Lieutenant</b>																
Workforce #/%	12/86%	0/0%	1/7%	0/0%	0/0%	0/0%	0/0%	0/0%	1/7%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Sergeant</b>																
Workforce #/%	28/88%	0/0%	1/3%	0/0%	0/0%	0/0%	0/0%	0/0%	2/6%	1/3%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Corporal</b>																
Workforce #/%	12/92%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	1/8%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
<b>Protective Services:</b>																
<b>Sworn-Patrol Officers</b>																
Workforce #/%	126/80%	2/1%	16/10%	0/0%	0/0%	0/0%	0/0%	1/1%	1/17%	0/0%	1/1%	0/0%	0/0%	0/0%	0/0%	0/0%

I understand the regulatory obligation under 28 C.F.R. ~ 42.301-.308 to collect and maintain extensive employment data by race, national origin, and sex, even though our organization may not use all of this data in completing the 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.

 [signature]	Certified As Final By: Sonya Stephenson [title]	HR Director [title]	03-05-2017 [date]
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## Step 4a of 7

### Utilization Analysis Chart: Two or More Standard Deviations

FAQ

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In evaluating discriminatory practices in the workplace, courts have generally recognized that statistics showing underutilization of qualified employees (classified by race, national origin, or sex) by two standard deviations or more may be significant. Based on the data you provided, the utilization analysis chart below displays only the job categories with underutilization of two or more standard deviations. In the displayed job category, the chart also indicates each particular group (cross-classified by race, national origin, and sex) in which the underutilization by two or more standard deviations occurred.

For information on the use of standard deviations in ensuring equal employment opportunity, please [click here](#)

Job Category	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
Protective Services: Sworn-Officials									✓							
Protective Services: Sworn-Patrol Officers		✓							✓						✓	

**Sonya Stephenson**

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**From:** DoNotReply@ocr-eeop.ncjrs.gov  
**Sent:** Sunday, March 05, 2017 3:13 PM  
**To:** Sonya Stephenson  
**Subject:** Received Certification

Hello [sstephenson@rutherfordcountyttn.gov](mailto:sstephenson@rutherfordcountyttn.gov),

Your EEOP Certification has been submitted successfully.

Since you are recipient of a DOJ award of more \$25,000 you must also submit an EEOP Utilization Report. Please return to the EEOP online system for step-by-step guidance in preparation and submission of your Utilization Report.

Thank You.