



October 28, 2013

Honorable Thomas J. Borris
Presiding Judge of the Orange County Superior Court
700 Civic Center Drive West
Santa Ana, CA 92701

Dear Judge Borris,

We sincerely apologize for the oversight in submitting our response to the Orange County Grand Jury report, "The Goal of Equal Employment Opportunity: NO VICTIMS". To ensure that all correspondences are received in a timely manner, we respectfully request that all communication be emailed to the undersigned in addition to the Grand Jury's regular method of disseminating information by postal mail.

Please find below our response to the Grand Jury's findings and recommendations.

Findings:

F1: Municipalities in Orange County cities are well-versed in EEO issues and maintain exemplary compliance strategies.

Response: The City of Stanton agrees with this finding.

F4: Complaint ratios between OC cities and the County of Orange are similar but differences in how previous complaints were handled in the County led to major problems.

Response: The City of Stanton agrees with this finding. However, it is good to note that although complaint ratios are generally expected to be directly proportional to the size of the city workforce, there is always the possibility of some large cities having a few (if not, none at all) number of EEO complaints (per information provided on page 11).

F5: The County and several cities do not offer or provide limited training in harassment, discrimination and retaliation, particularly for line staff. At this time, although line staff training is not required, all staff benefit from EEO training.

Response: The City of Stanton agrees with this finding (per information provided on pages 8 & 9).

F6: There are several Risk Management Joint Powers Insurance Pools (of which most cities are members) to ensure adequate coverage and sharing of liability with other member entities.
Response: The City of Stanton agrees with this finding.

Recommendations:

R1: All OC cities and County government shall include funding for training of management and supervision as required by law and ensure training for all employees every two to three years.

Response: This recommendation has been implemented. The City's annual budget provides for both professional and mandatory (required by law) training including sexual harassment and discrimination training for management, supervisory and line personnel. All managers and supervisors are required to take the AB1825 training every two years. Newly hired or promoted managers and supervisors have to take this training within the first 6 months from date of hire/appointment. All employees take an online training every two years. Training documentation record is maintained by Personnel.

R2: OC cities shall review SIR aggregate limits every five years to assess changes in risk management economies and insurance pool mix.

Response: This recommendation has been implemented. Through the City's membership in PERMA (Public Entity Risk Management Authority), coverage for employment related lawsuits such as wrongful termination and discrimination is provided through its participation in the Employment Risk Management Authority (ERMA). ERMA provides underwriting and actuarial reports to the City as well as loss control services, training, and compliance auditing to minimize claims expenses and reduce loss exposures.

R3: OC cities and the County of Orange government shall continue efforts to utilize best practices with respect to Harassment, Discrimination and Retaliation.

Response: This recommendation has been implemented. The City of Stanton has a policy and procedures in place for reporting, handling and investigating harassment, discrimination and retaliation complaints. This is included in the Personnel Handbook (Article XIX) which is given to all new employees during the New Employee Orientation.

Thank you for the opportunity to participate and provide our responses to the OC Grand Jury findings and recommendations on "The Goal of Equal Employment Opportunity: NO VICTIMS" report and we hope to be of assistance again in the future.

Respectfully yours,



James A. Box
City Manager

Cc: OC Grand Jury