LGBT Data Task Force

Executive Summary and Recommendation to the Chair and Board of Commissioners

January, 2014


Multnomah County is committed to equitable treatment of its lesbian, gay, bisexual, transgender and queer (LGBTQ) employees and has policies and benefits in place which reflect that commitment. However, unlike other demographic data which the county collects, there is currently no mechanism in place to gather employee data about sexual orientation and gender identity. This makes it difficult to determine whether policies and benefits established to ensure equitable treatment are actually accomplishing their express purpose.

An informational board briefing on the LGBTQ Data Collection Project was held on June 11, 2013 to consider implementing employee self-reporting of sexual orientation and gender identity information. As a result of that briefing, the LGBT Data Task Force was created and charged with making a recommendation on the desirability and feasibility of collecting demographic data regarding employees' sexual orientation and gender identity for the purpose of creating a data base, which would allow analysis of trends in LGBTQ hiring, retention, promotion and other employment actions.

The Task Force is chaired by Roberta Phillip of the Office of Diversity and Equity. Members are Casey Filice, Chair Madrigal's Office; Travis Graves, Human Resources Director; Abbey Hendricks, Benefits; Chris Radzom, Labor Relations; Liz Rodriguez, Prism Employee Resource Group; Kim Toevs, Health Department; James Opoka, Department of Community Justice Human Resources; and Mary Beth Allen, DCA/DCM/Non-departmental Human Resources.  Also participating in early meetings of the Task Force were Daryl Dixon, former Director of the Office of Diversity and Equity, and Carla Gonzales, former Human Resources Manager, Central Human Resources.

Starting in June of 2013, the Task Force met once or more monthly to research issues related to data collection. The Task Force explored some of the major issues related to the practice of collecting employee data related to LGBTQ status. These issues included privacy concerns of LGBTQ employees; maintaining the confidentiality of the data; and legal and equal employment opportunity concerns.

The Task Force reached out to Prism, an Employee Resource Group focused on ensuring equity and inclusion for LGBTQ county employees, and asked group members to weigh in on the issue of data collection. Many Prism members responded to the survey. While expressing some concern about the security of the data, they endorsed the concept of data collection provided those concerns were addressed. The Task

Force also devoted considerable time to considering and exploring different wording options for the questions posed to elicit the sexual orientation and gender identity status data.

After extensive research and discussion, the Task Force concluded this Fall that collecting voluntary employee data on sexual orientation and gender identity would be extremely beneficial to Multnomah County. The data would permit the county to evaluate the success of its non-discrimination policies and benefits by measuring recruitment, retention, promotion and termination of LGBTQ workers. The establishment of business metrics to objectively evaluate non-discrimination programs is critical to maintaining effective, fully inclusive diversity programs as they relate to LGBTQ employees (and, indeed, to employees in all protected classes). The DTF decided to concentrate data collection on "LGBT" status although we understand that these are not the only data field options available (see Appendix A).

After deciding the threshold issue of whether or not the County should collect LGBTQ employee data in the affirmative, the Task Force turned to the question of how to best collect specific data on sexual orientation and gender identity.  After considering several options, the Task Force is recommending that the data be collected using SAP Option 2 (see Appendix B) via the existing SAP HRIS system, specifically through a separate form on Multco Commons. Collection of the data through SAP is the preferred approach because use of the county's enterprise system--the same system that houses all other employee data—will institutionalize and normalize the data. Additionally, access to the data could be controlled and, where appropriate, restricted to meet privacy and security concerns.

As this option will require some customization of the SAP system for data entry purposes, the Task Force defers to the county's Human Resources Director for a recommendation on a realistic timeline for set-up and roll-out of the data collection initiative, in light of the cost of customization (estimated at 243 hours of staff time) and prioritization of SAP projects. In order to maintain momentum on the project, the Task Force is recommending that implementation of collection of data on sexual orientation and gender identity begin in FY 2015.

The Task Force recommends that any analysis for purposes not described here requires approval from a stakeholder group. The request for approval will include an explanation of the purpose, description of the full data set to be used, and justification for use of personally identified data such as name or date of birth. The request will identify the specific individuals and job titles of those who will access the data and perform the analyses. The request will identify with whom the aggregate results of analyses will be communicated. The request will articulate how the analysis will meet a justifiable human resource need. Any risks or unintended consequences must be

identified. In cases in which identifiable individual records are to be linked with any other dataset, the request will also articulate the legal authorization for the linkage.

The Task Force wishes to express its appreciation to the Chair and Board for their commitment to equitable treatment of all employees, and for their consideration of this recommendation that the county implement employee data collection related to LGBTQ status.

**Appendix A**

## Self-ID Questions

1. Do you consider yourself to be (choose one):

Gay or lesbian

Straight, that is, not gay or lesbian

Bisexual

Prefer not to say

Some people identify as transgender if they have a different gender identity from their sex at birth. For example, a person born into a female body, but who identifies as male or lives as a man. This can also include people who are gender queer or gender nonconforming.

2. Do you consider yourself to be transgender?

Yes

No

Prefer not to say

**Appendix B**

## System Options for Collecting LGBTQ Data

**Initial Assumptions**
- Proposed collecting responses to two questions around LGBTQ identification
- Requires safe/private means for employees to voluntarily disclose this data
- Utilizing SAP as the system of record would be ideal
- Utilize existing SAP security roles if possible
- Implementation should be done in a way that requires the least amount of customization
- Estimates on time are rough and will need to be evaluated once requirements are finalized
- Options provided in this summary may need to be revised based on further evaluation of final requirements
- Project will require a formal IT Project Plan, Project Charter and presentation by IT Personnel/ Project Manager to the Change Advisory Board
- Timing of implementation will be dependent on other IT priorities (e.g. the settlement of the physician's first collective bargaining agreement) and staffing resources
- If implemented in SAP, subject matter experts will need to be available for testing and configuration

## Option 1

Web form on Commons for users to access and complete with data stored in an ODE Google group file only--not stored in SAP.  Assumption: ODE or Web Applications team would create form.

Advantages
- Eliminates need for any custom SAP development
- ODE has staff trained in creating web forms
- Would give ODE an opportunity to gauge level of interest in disclosing this information before "investing" in a custom SAP development
- Much quicker completion timeframe
- Easier to make form changes

Disadvantages/Challenges/Considerations
- SAP team cannot vouch for the security/privacy of the data

- Will make reporting more involved because it will have to be pulled separately from any SAP data/SAP reporting method that may be needed as part of the reporting needs

**Estimated time to complete: 16 hours**

## Option 2

Web form on Commons for users to access and complete (ODE or Web Applications team would create form) with custom-developed programs to extract and load into SAP. Also assume ODE would take lead on working with Web Applications Team.

Advantages
- Eliminates need for a custom ESS web service and a specialized SAP portal/web developer
- Utilize current SAP infotype Additional Personal Data (see Example A) with custom include for required fields (similar to grievance tracking – see Example B)
- Slightly less custom development time than creating a custom infotype which is best practice where possible/feasible.
- May use SAP Ad Hoc Query for reporting
- Utilize existing SAP security for Additional Personal Data Role which would include view and reporting by ODE, HR, Payroll and Benefits (would require role clean-up)

Disadvantages /Challenges/Considerations
- Requires SAP development time to create fields in SAP and custom programs to load into SAP--one by Web Team to place data on database and one by SAP to pull and load data into SAP
- May require additional SAP development resources depending on workload
- Cannot vouch for the security/privacy of the data on the web applications database
- Any changes to the web form would impact extract and load programs and must be coordinated with Web Team and SAP Team to ensure appropriate updates to programs

**Estimated time to complete: 243 hours**

## Option 3

New custom portal service similar to Personal Information Form that would accommodate responses to these questions and update SAP once submitted

Advantages
- Similar to Option 1 except utilizing SAP portal to gather the data
- Employee would be able to disclose privately and update their own records similar to address updates and W4 withholding changes

Disadvantages/Challenges/Considerations
- Requires custom development portal development
- Larger project which may have impact on other priority work
- SAP Team is trying to move away from custom portal services to SAP delivered where possible, but SAP does not deliver a self service profile or infotype to collect this type of data

**Estimated time to complete:  333 hours**


## **Option 4**

Rewrite current custom Personal Information Form (name change and/or address change) service updating to current programming language standards and modify to collect additional pieces of data

Advantages
- Employee would be able to disclose privately and update their own records like address updates and W4 withholding
- Leverage an existing service so that employees are going to one form instead of multiple forms

Disadvantages/Challenges/Considerations
- Currently Personal Information Form updates are saved in a "staging" table that department HR Maintainers must review and release (they edit/abbreviate addresses where necessary)
- Some departments are better than others in attending to and releasing these updates
- SAP IT is trying to move away from custom portal services to SAP delivered where possible and adding to this service would impose restrictions in moving toward SAP-delivered model
- Additional hours and questions about staging this data versus directly updating SAP

**Estimated time to complete:  390 hours**

## Example A

**Create Additional Personal Data (0077)**

Personnel No
EE group
Org. Unit
Start _____ To 12/31/9999

**Additional Personal Data**

Ethnic origin [☑] ▼
Military status [ ]
☐ Medicare
☐ EEO Exempt

| Veteran Status | Disability |
|---|---|
| ☐ Special disabled veteran | ☐ Disability |
| ☐ Vietnam-era veteran | Disability Date [____] |
| ☐ Other veteran | Date Learned [____] |
| ☑ Non-veteran | |

## Example B



**Display Grievances/Discipline (0102)**

| Personnel No | | Empl./a | | Class Seniority | |
|---|---|---|---|---|---|
| EE group | 1 Reg - Represented | | EE subgroup | 01 Full Time Hourly | Active |
| Org. Unit | | | | | |
| Start | 10/30/2013 to 12/31/9999 | Chng | | | |

**Grievance data**

| Subtype | 1 | Grievance |
|---|---|---|
| Reason | 52 | Personnel Records |
| Date entered | 10/26/2013 | |

**Status**

| Stage | 01 | Step 1 | |
|---|---|---|---|
| Result | 00 | GR-Pending | Date settled |

**Additional fields**

Customer Include for County Specific Data/Fields

| Case No. | 0 |
|---|---|
| Other Reason | 000 |
| LR Manager | |
| Status | 01 Case was dismissed |