



CITY OF TOLEDO GENDER EQUITY ANALYSIS

Draft Report

Prepared for:

City of Toledo
One Government Center
Toledo OH 43604

Draft Report
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**KEEN
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RESEARCH**

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GENDER EQUITY ACTION PLAN

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SUMMARY REPORT — Executive Summary

The City of Toledo seeks to strengthen and build upon its existing efforts to become a more equitable city.

Study Background and Overview

The City of Toledo retained Keen Independent Research (Keen Independent) to analyze its current approach to gender equity in City policies, programs, practices and compensation. Using information gathered during the study, Keen Independent developed a Gender Equity Action Plan for the City to use alongside the Summary Report. The study began in September 2024 and was completed in October 2025.

City staff shared valuable insights regarding the City’s policies, programs, practices and compensation. Keen Independent collected input from more than 750 City employees as part of this study. For the purposes of anonymity and privacy, all comments are reported in aggregate and without identifying any of the participants.

Study Approach

The study team collected and analyzed information gathered through the following:

- An internal citywide survey;
- Analyses of the City’s policies, programs and procedures;
- Comparative analysis of case study cities;
- In-depth interviews and focus groups with City leadership;
- Analyses of the City’s workforce composition;
- Analyses of the City’s compensation; and
- Other relevant research.

Findings are summarized in greater detail in the supporting appendices of the Summary Report.



SUMMARY REPORT — Executive Summary

Overview of Gender Equity Action Plan and Next Steps

Keen Independent developed a Gender Equity Action Plan spanning five years based on study findings. The Gender Equity Action Plan contains three high level recommendations, each with several actionable sub-recommendations, operational strategies and examples of key performance indicators.

Figure ES-1 below summarizes these recommendations.

Keen Independent presents further information in the Gender Equity Action Plan, which is designed to be a standalone document and ongoing resource for City leadership.

ES-1. Gender Equity Action Plan summary of recommendations and actions

City of Toledo Gender Equity Action Plan: Recommendations and Actions	
Recommendation	Action
1. Equity in employment practices	
1-1. Develop and maintain clear and accessible policy language	a. Review and revise policies to ensure clarity and accessibility
1-2. Standardize performance criteria and promotion procedures	a. Develop and standardize performance evaluation templates b. Develop and standardize promotion guidelines
1-3. Clearly communicate career advancement pathways	a. Create materials outlining career pathways and progression opportunities b. Establish regular communication and engagement around career growth
1-4. Establish and implement structured onboarding and offboarding procedures	a. Formalize offboarding procedures, included equity-focused interviews b. Formalize onboarding procedures, including review of employment policies and procedures
2. Decision-making and communications	
2-1. Increase transparency by Leadership in all decision-making processes	a. Communicate existing and upcoming revisions to all policies b. Communicate updates on equity initiatives and strategic goals
2-2. Create feedback loops to inform decision-making	a. Formalize mechanisms for collecting, tracking and reviewing employee feedback b. Communicate feedback outcomes and integrate input into decision-making
3. Data systems	
3-1. Strengthen and maintain more comprehensive Human Resources (HR) data systems and employee data tracking	a. Implement HR data system improvements b. Train staff to use data systems
3-2. Use employee data to support equity initiatives	a. Integrate equity metrics into workforce planning and decision-making b. Apply data findings to inform equity-related policies, procedures and programs

SUMMARY REPORT — Executive Summary

Next Steps for City's Consideration

City leaders may consider the following next steps:

1. Review all aspects of the recommendations identified in this Gender Equity Action Plan.
2. Review the Equity Checklist for usability across City decision-making processes.
3. Obtain approval and align leadership on Gender Equity Plan recommendations and Equity Checklist.
4. Position leadership to embed elements of the recommendations and Equity Checklist into other organizational processes and plans.
5. Assign equity-related responsibilities to parties and ensure an understanding of duties.
6. Collaborate between departments to determine equity benchmarks.
7. Plan and allocate necessary resources (e.g., staff time and required budget).
8. Schedule check-ins with members of City leadership at regular intervals to assess progress.
9. Develop a strategy and plan for sharing recommendations and outcomes with stakeholders and reaffirm City leadership's commitment to the Gender Equity plan's success.

SUMMARY REPORT — Introduction

The City of Toledo seeks to continue to advance gender equity throughout all operations. The City engaged Keen Independent to assess its current approach to gender equity, and to develop a Gender Equity Action Plan to guide the organization as it continues its efforts to become more equitable.

In 2022, the City enacted Chapter 184, the local CEDAW (Convention of the Elimination of All Forms of Discrimination Against Women) Ordinance to address discrimination against women, girls and other minoritized genders.^{1,2} This ordinance serves as the guiding framework for this study and informs the City's ongoing commitment to equity.

Research Approach

This study concluded in October 2025 and used information from:

- Comparative analysis of other cities;
- Analysis of the City's policies and procedures;
- Pay equity analysis;
- Examination of City workforce hiring, promotions and separations;
- Interviews with City leadership and staff;
- Review of prior reports and recommendations; and
- Climate survey with City employees.

The City provided data and documentation of policies and procedures. Keen Independent obtained input from nearly 750 City employees through these efforts. The study team contacted City leadership and staff for individual interviews and listening sessions.

¹ American Legal Publishing (2022). Chapter 184, Local implementation of United Nations Convention of the Elimination of all forms of Discrimination Against Women (CEDAW). Retrieved on August 21, 2025, from https://codelibrary.amlegal.com/codes/toledo/latest/toledo_oh/0-0-0-161437.

² City of Toledo website. Gender Equity. Retrieved on August 21, 2025, from <https://toledo.oh.gov/departments/diversity-equity-and-inclusion/gender-equity>.

SUMMARY REPORT — Introduction

Methods. Keen Independent examined past City studies, reviewed policies and procedures, performed comparative analysis of other cities and examined best practices as a part of this effort. All full-time City employees were asked for input that informs us of our recommendations. A member of the Keen Independent study team presented study results in person to the City Council of Toledo's Community & Administrative Services Committee on January 22, 2026, during a meeting that was open to the public.

Limitations. Keen Independent gathered data from a variety of internal and external sources to provide information that is useful for reviewing the City's policies and data as of mid-year 2024. Organizational conditions constantly change and this analysis is based on data available at the time without knowledge of future conditions.

Keen Independent cannot express or imply representation or warranty on all the data sources and resulting analyses in this report, which draw on a combination of primary and secondary research. We take precautions to ensure the accuracy of all primary research data and to evaluate the reliability of secondary sources to the extent possible.

Organization of the Report

We first present brief summaries and analysis of data collected that informed our recommendations. Topics covered are:

- Employment;
- Workplace culture;
- Gender equity and fairness; and
- Gender Equity Action Plan overview.

Following this information, we present our recommendation and implementation models.

Our recommendations are supported by additional research documented in appendices. Listed below is each appendix.

- A. Provides a comparative analysis of gender equity-related efforts of other CEDAW cities;
- B. Summarizes and evaluates City policies and procedures through an equity lens;
- C. Presents results of the employee climate survey;
- D. Summarizes results of workforce data analysis;
- E. Summarizes results of City pay analysis; and
- F. Presents qualitative insights of in-depth interviews.

SUMMARY REPORT — Introduction

Comparative Analysis

Keen Independent performed a comparative analysis of three cities that passed a Convention on the Elimination of All Forms of Discrimination (CEDAW) ordinance or adopted a resolution to do so.

CEDAW background. CEDAW is an international treaty adopted by the United Nations in 1979 with the goal of ending discrimination against women and promoting gender equality. It outlines various measures that governments should implement to ensure women's rights, including equal access to education, employment, and political participation. CEDAW provides a framework for addressing and challenging gender-based discrimination across different sectors of society.

In the United States, more than 14 ordinances and 40 resolutions have been approved, with over 50 local coalitions actively pursuing CEDAW initiatives.³ The City of Toledo enacted Chapter 184, the Local CEDAW Ordinance in 2022 to address discrimination against women, girls and other minoritized genders.^{4,5}

Framework. CEDAW provides the City with a practical framework to assess how its policies and practices advance gender equity. By focusing on equal access to opportunity, fair compensation, representation in decision-making and supportive workplace structures. CEDAW helps

translate broad principles into measurable local action. This analysis draws directly from these principles to evaluate where the City is making progress and where improvements can be made.⁶

Case studies. The study team evaluated the gender equity-related practices and initiatives of Cincinnati, Kansas City MO and Pittsburg (see Appendix A) .Commonalities among each of the three cities include:

- City elected officials play a pivotal role in advancing gender equity initiatives.
- Regular reporting on workforce data is important for driving systemic change through informed decision-making.
- Partnerships with local organizations can be key to guiding equity initiatives where internal capacity is not yet in place.
- Equity initiatives can be adapted to types of city departments. For example, police and fire departments have specialized efforts to further open job opportunities for women, in part due to the extreme historic disparities for women in public safety jobs.
- CEDAW principles help guide a city in achieving gender equity.

³ Cities for CEDAW (2024). Cities for CEDAW. Retrieved on December 2, 2024, from <https://citiesforcedaw.org/>.

⁴ American Legal Publishing (2022). Chapter 184, Local implementation of United Nations Convention of the Elimination of all forms of Discrimination Against Women (CEDAW). Retrieved on August 21, 2025, from https://codelibrary.amlegal.com/codes/toledo/latest/toledo_oh/0-0-0-161437.

⁵ City of Toledo website. Gender Equity. Retrieved on August 21, 2025, from <https://toledo.oh.gov/departments/diversity-equity-and-inclusion/gender-equity>.

⁶ United Nations. (1979). Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), General Assembly resolution 34/180, adopted December 1979, enacted September 1981. Retrieved September 3, 2025 from <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>.

SUMMARY REPORT — Employment

Keen Independent examined workforce composition, policies and procedures, employee compensation and City employee input.

Disparity Methodology

In the following tables that compare certain outcomes for City employees (e.g., demographics, hiring, promotions, separations), Keen Independent displays the outcome, a benchmark and a “disparity index.” The study team calculated each disparity index by dividing the observed outcome by the group’s benchmark and multiplying by 100. A value of “100” represents parity for that outcome for that group. Indices below 80 indicate a substantial disparity, meaning the group’s representation or outcome is notably lower than expected.

For separation data, indices above 120 also reflect substantial disparity, as values higher than 100 suggest higher-than-expected separations for that group. Percentages are rounded to the nearest tenth, while calculations use unrounded figures.

Demographic Characteristics of City Employees

More than 2,500 employees comprise City full-time staff. Keen Independent compared the representation of gender and racial groups in City jobs to what might be expected from the local labor pool for those jobs. We performed this by job category (standard “EEO-4” job categories established by the federal government). For example, women hold 23.6 percent of City jobs, lower than the 20.7 percent expected from analysis of the local labor pool for similar jobs.

Across EEO-4 job categories, overall representation of women was substantially below what would be expected based on labor pool availability. However, these disparities were only evident for white women. The share of City jobs held by women of color exceeded what might be expected from examining the local labor pool.

When examining overall workforce, the share of City jobs held by Asian American workers was less than what would be expected (disparity index of 73), and there was a substantial underrepresentation of American Indian workers (1.2%) compared to what might be expected given the composition of the labor force (2.8%).

Appendix D contains more details about these analyses.

1. Workers in City’s workforce (all EEO-4 job categories), 2021-2024

	(a)	(b)	(c)	(d)
All EEO groups	Employees	Percent of employees	Availability	Disparity index (b/c)
Race/ethnicity				
African American	1,933	20.2 %	5.2 %	389
Asian American	81	0.8	1.2	73
Hispanic American	618	6.5	5.4	119
American Indian	110	1.2	2.8	41
Total people of color	2,742	28.7 %	14.6 %	197
Non-Hispanic white	6,819	71.3	85.4	83
Total	9,561	100.0 %	100.0 %	
Gender				
Women	2,254	23.6 %	30.7 %	77
Minority female	754	7.9	5.9	133
White female	1,500	15.7	24.7	64
Men	7,307	76.4 %	69.3	110
Minority male	1,988	20.8	8.6	241
White male	5,319	55.6	60.7	92

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

SUMMARY REPORT — Employment

Hiring

Keen Independent reviewed existing policies and procedures related to hiring, examined hiring and current employment data for disparities and conducted an employee climate survey to collect staff input regarding their experience in the workforce.

Figure 2 examines whether there are disparities in hiring for City from 2021 through 2024.

- Other than for American Indian workers, the percentage of hires who were people of color was above what might be expected given the availability in the local marketplace.
- The number of women hired by the City from 2021 through 2024 matched what might be expected from the availability analysis (26.5% of the hires compared with 27.1% availability for those positions in the local workforce). Most of those hires were women of color. Hiring of white women was below what might be expected given availability of workers in the local area.

2. City hiring of workers, 2021-2024

	(a)	(b)	(c)	(d)
All EEO groups	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	320	27.3 %	5.7 %	480
Asian American	18	1.5	1.1	136
Hispanic American	98	8.4	5.6	148
American Indian	13	1.1	3.1	36
Total people of color	449	38.3 %	15.5 %	247
Non-Hispanic white	724	61.7	84.5	73
Total	1,173	100.0 %	100.0 %	
Gender				
Women	311	26.5 %	27.1 %	98
Minority female	120	10.2	5.8	178
White female	191	16.3	21.4	76
Men	862	73.5 %	72.9 %	101
Minority male	329	28.0	9.8	287
White male	533	45.4	63.1	72

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

SUMMARY REPORT — Employment

Employee Perceptions of Hiring Practices at the City

Keen Independent collected and analyzed qualitative input from in-depth interviews and an employee climate survey regarding employees' perceptions of equity in hiring and promotions policies at the City.

Insights from in-depth interviews with employees. Several interviewees reported that the City maintains scoring guides for interviews, however they are not used consistently when interviews are conducted informally. Some employees indicated that hiring decisions were influenced by personal relationships with existing City employees. Examples of quotes are shown to the right.

Gender is not a factor. Who you are friends with is what matters here.

African American male employee

The City thrives on the buddy system. They have rigged the hiring process and typically they have already informed the person who they will hire to apply for the position.

Employee

I've seen where some employees received jobs because they are friends with staff members vs others who are good because they are male, female or African American.

African American male employee

SUMMARY REPORT — Employment

Insights from employee climate survey. Keen Independent created a customized climate survey to obtain employee insights on employment practices, workplace climate and equity. The survey was electronically distributed to all City employees with an email address, and flyers with survey QR code and link were also utilized. There were 739 employees who participated in the internal survey, with 437 completed responses. See Appendix C for more information on the climate survey.

As shown in Figure 3, more than 80 percent of climate survey participants indicated that the City was doing well or very well (selected a rating of 5 or higher) in efforts to eliminate gender discrimination in hiring practices, while 8 percent of employees reported the City was not achieving the goal (chose a rating of 3 or lower).

Examples of comments from employees who indicated that the City was doing very well (selected a rating of 7) are shown below.

I can't say I see any gender bias in the selection process across the divisions of the City.

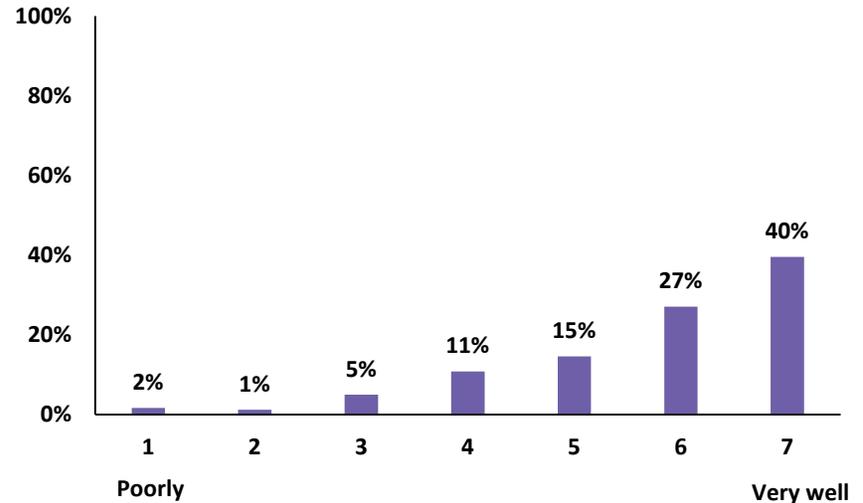
White male employee

I have not seen any discrimination.

African American female employee

See Appendix F for more information about the in-depth interviews.

3. Participants' opinion of how well the City is doing at eliminating gender discrimination in hiring



Note: N = 240.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Employment

Promotions

Keen Independent analyzed the demographic characteristics of City employees promoted from 2021 through 2024, after controlling for job category. Results of the analysis showed the following:

- The promotion of people of color (0.134 promotions per worker during this time period) was about what Keen Independent calculated as the expected rate (0.141). (Keen Independent calculated benchmarks that reflected the different mix of City jobs held by different groups of employees, as some positions had higher average rates of promotions than others.)
- The promotion rate of Asian Americans and American Indians workers was substantially lower than the estimated rate, but this could be explained by random chance in promotions given the relatively small number of Asian American and American Indian employees at the City.
- There was no overall disparity in rates of promotion of women after controlling for the wide range of job titles held by women (disparity index of 106). Promotion rates for women of color and white women were the same.

Appendix D contains more details about these analyses.

4. Promotions for City workers in all EEO-4 jobs, 2021–2024

	(a)	(b)	(c)	(d)	(e)
All EEO groups	Promotions	Average number of employees	Promotions per employee (a/b)	Benchmark	Disparity index (c/d)
Race/ethnicity					
African American	69	483	0.143	0.141	101
Asian American	2	20	0.099	0.142	70
Hispanic American	18	155	0.117	0.141	83
American Indian	3	28	0.109	0.140	78
Total people of color	92	686	0.134	0.141	95
Non-Hispanic white	244	1705	0.143	0.140	102
Total	336	2390	0.141		
Gender					
Women	84	564	0.149	0.141	106
Minority female	28	189	0.149	0.141	105
White female	56	375	0.149	0.141	106
Men	252	1827	0.138	0.141	98
Minority male	64	497	0.129	0.141	91
White male	188	1330	0.141	0.140	101

Note: Column (e) scores below 80 (highlighted) are substantial disparities.

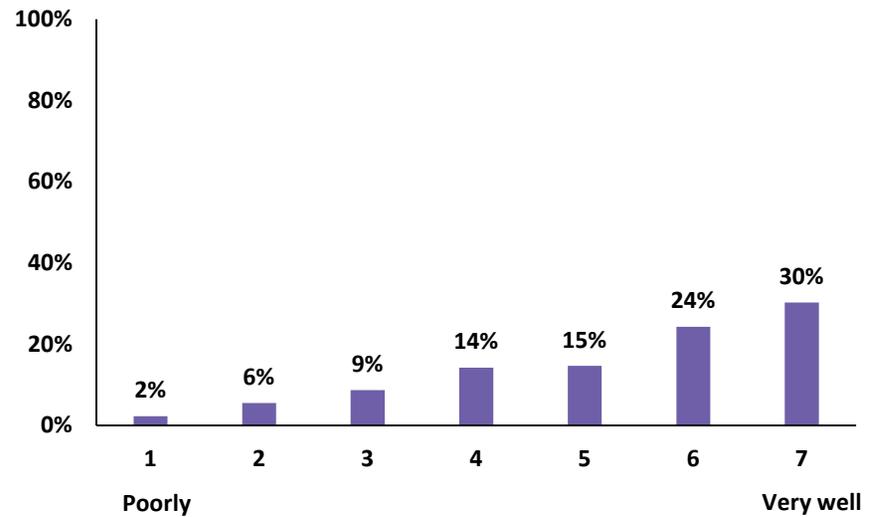
Source: City employee data, Census ACS 2019–2023 data for availability analysis.

SUMMARY REPORT — Employment

Insights from employee climate survey. Employees were asked about their perceptions of the City’s efforts to eliminate gender discrimination in its promotion practices in the Climate Survey (see Appendix C), with about 69 percent of employees providing a positive rating (response of 5, 6 or 7), while 17 percent indicated a negative rating (response of 1, 2 or 3). See Figure 5.

Further analysis of results revealed differences in perceptions between male and female employees. Among female employees who responded to this question, 21 percent chose a value of 3 or less. Very few male employees (8%) chose a value of 3 or less. Similarly, about 63 percent of women reported that the City is doing well (chose a value of 5 or greater), considerably less than the 81 percent of men who responded.

5. Participants’ opinion of the City’s efforts in eliminating gender discrimination in promotions



Note: N = 218.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Employment

Insights from in-depth interviews with employees. Some employees indicated that favoritism or preferential treatment may impact promotions. Many also reported that the City lacks a consistent system or defined metrics for performance evaluations, and that any employee review or feedback is left up to managers' discretion. Some interviewees indicated that this practice diminishes consistency and may indicate that promotions are not always based on merit (see Appendices C and F).

Sample quotes are shown to the right.

We don't do performance evaluations Because we don't give that feedback, it is a barrier. Some employees [feel held back].

Leadership

It is difficult, as a director, not having a formal and consistent [performance evaluation] that I can use for all employees.

Leadership

I've seen people not get promoted, just reclassified into management positions, not having any of the merit that another person has been asked to have There's no consistency insofar as anything that goes on promotionally within the City of Toledo.

Staff

The City claims to pay its employees off of experience and merits, but never once has done any sort of performance review. No evaluation of merits at all in fact.

White female employee

SUMMARY REPORT — Employment

Separations

Keen Independent reviewed separation trends from 2021 through 2024 to identify any disparities in employee retention by gender and job category. Figure 6 examines whether there are disparities in separations from the City and substantial disparities were found for:

- African American workers (0.151 separations per employee compared to the expected rate of 0.125 separations per employee for this group); and
- White women (0.149 separations per employee compared to an expected rate of 0.122 for this group).

More than one-half of the women separating from the City were in Administrative Support positions, which is also the job category where women were most highly represented.

6. Separations for City workers in all EEO-4 jobs, 2021–2024

All EEO groups	(a) Separations	(b) Average number of employees	(c) Separations per employee (a/b)	(d) Benchmark	(e) Disparity index (c/d)
Race/ethnicity					
African American	73	483	0.151	0.125	121
Asian American	0	20	0.000	0.120	0
Hispanic American	15	155	0.097	0.123	79
American Indian	4	28	0.145	0.123	119
Total people of color	92	686	0.134	0.124	108
Non-Hispanic white	201	1705	0.118	0.122	97
Total	293	2390	0.123		
Gender					
Women	81	564	0.144	0.123	117
Minority female	25	189	0.133	0.123	108
White female	56	375	0.149	0.122	122
Men	212	1827	0.116	0.123	95
Minority male	67	497	0.135	0.125	108
White male	145	1330	0.109	0.122	90

Note: Separations exclude death, retirement and departure due to health reasons. Column (d) scores of 120 or higher (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

SUMMARY REPORT — Employment

Employment Policies and Procedures

Written policies and procedures establish the foundation for workplace gender equity.

Review and assessment. Keen Independent reviewed administrative policies and procedures that apply to the City workforce (detailed summaries appear in Appendix B). Categories of documents we reviewed include:

- Discrimination, violence and retaliation in workplace policies;
- Employment policies; and
- Insurance, medical and related leave policies.

Overall, the City's policy and procedure documents establish organizational expectations, but greater clarity and accessibility would strengthen their effectiveness. The effectiveness of any policy depends on employees' awareness and understanding of it, making perceptions of communication and enforcement especially important.

Employees were also asked about policies in the Climate Survey (Appendix C) and both staff and City Leadership mentioned their impressions of the policies (Appendix F).

SUMMARY REPORT — Employment

Employee perceptions of City policies and procedures. As shown in Figure 7, approximately 61 percent of City employees who completed the Climate Survey believed that City policies support fair treatment of employees (selected a rating of 5 or greater) and 17 percent disagreed (selected a rating of 3 or less). Women of color were more likely to provide a lower score compared to other employees.

Inconsistency and enforcement of policies were mentioned in in-depth interviews and in qualitative findings. Examples of comments are shown below.

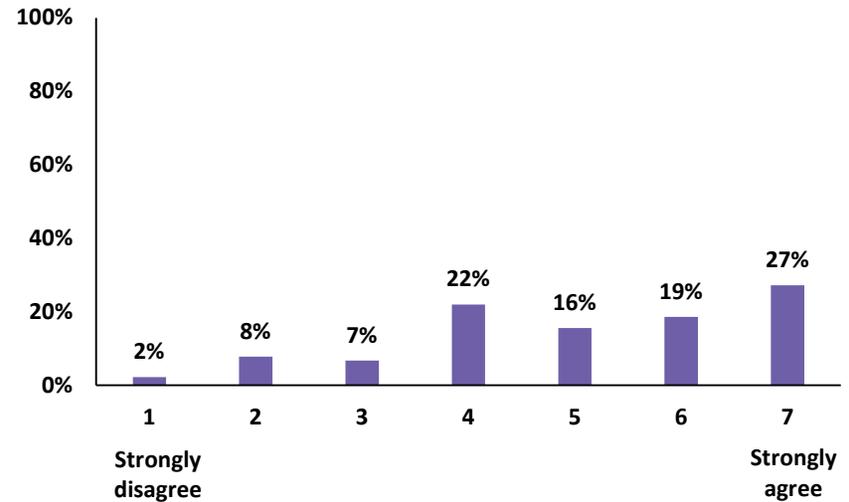
There is room for improvement. Even though workplace policies are established, a Director can send an email and change what's allowed on some policies Therefore, departments have different rules under the same policy.

African American female employee

Perhaps if the policies were enforced the same on everyone, sure they support fair treatment then. In reality, that is not what happens.

White female employee

7. Participants' opinion of whether the City's policies support fair treatment of employees



Note: N = 360.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Employment

Employee perceptions of City pay policies. Approximately 20 percent of respondents believe that the City’s policies and practices do not promote fair pay (chose a value of 3 or less). Whereas almost two-thirds believe that the City’s policies do promote fair pay. Women were more likely than men to disagree that policies promote fair pay compared to men. See Figure 8.

Employee awareness of City policies and procedures. When employees were asked if they learned about City policies during the onboarding process, staff were unaware if this happened and several staff members shared the following.

I don't think that they necessarily go through the City policies and really get into the weeds of how those are supposed to be applied.

Staff

I don't even think with the onboarding now that they even go over the administrative policies with the new hires.

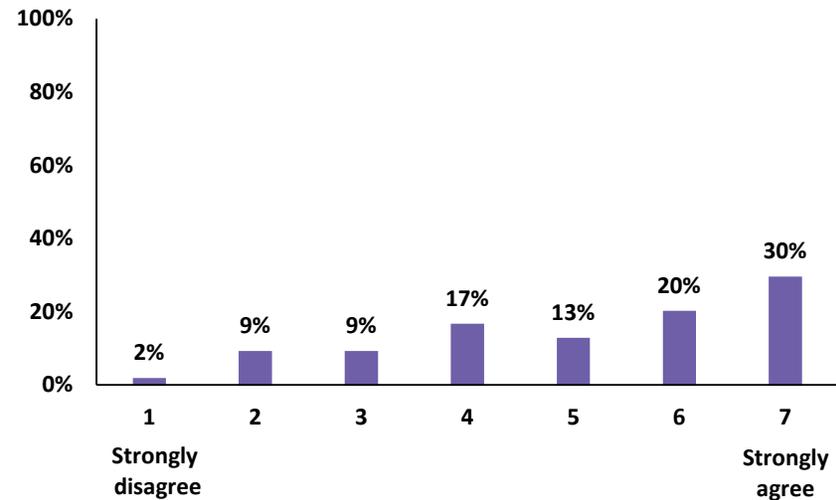
Staff

While no City leadership explicitly stated that the policies are reviewed during the onboarding process, one participant did share that discrimination laws are covered:

... our onboarding process ... does include a pretty robust component about the basic discrimination laws and ... In our DEI department, you know how to bring a complaint if you have one.

Leadership

8. Respondents’ belief that the City has effective policies to promote fair pay



Note: N = 311.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Workplace culture

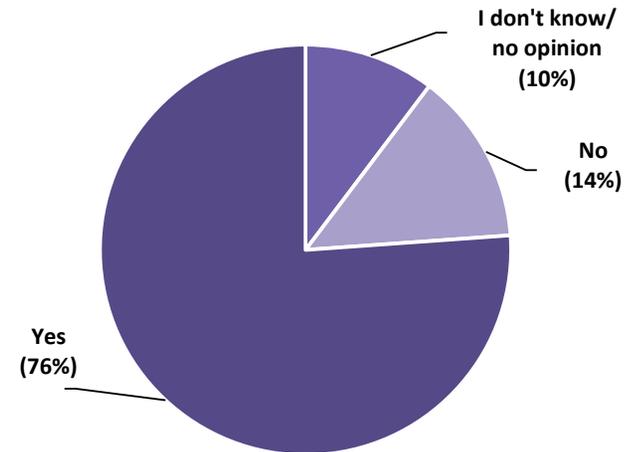
Workplace culture reflects how employees experience their environment, encompassing perceptions of safety, fairness and organizational support that together shape overall satisfaction and trust in the workplace.

Employee Impressions

Keen Independent sought employee impressions of workplace culture through the climate survey (see Appendix C) and qualitative insights (see Appendix F).

Workplace safety. Approximately 76 percent of employee respondents indicated that they feel safe in the workplace and 14 percent reported they did not feel safe (see Figure 9). Employees of color were less likely than white employees to report feeling safe in the workplace. There were no notable differences found between male and female employees in their perceptions of workplace safety.

9. Participants' responses to whether they feel safe in the workplace



Note: N = 486.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Workplace culture

Several employees reported feeling safe and mentioned recent trainings. Sample quotes are shown below.

For the most part, I feel safe. But this is from our group training and being accountable for ourselves.

White male employee

I work in a secure area. I attended the training last fall in which we were offered good information about keeping safe should there be a safety breach.

White female employee

Even though employees mentioned this recent training, some employees still reported more could be done by the City to feel safe in their workplace. Sample quotes are presented below.

Safety needs to be a higher priority. It is not taken seriously. Management needs to grasp safety better and implement stronger standards and procedures.

Male employee

We had a safety in the workplace seminar, but no additional trainings or items brought up in the meeting were ever implemented. As usual, it's all talk and no changes.

Employee

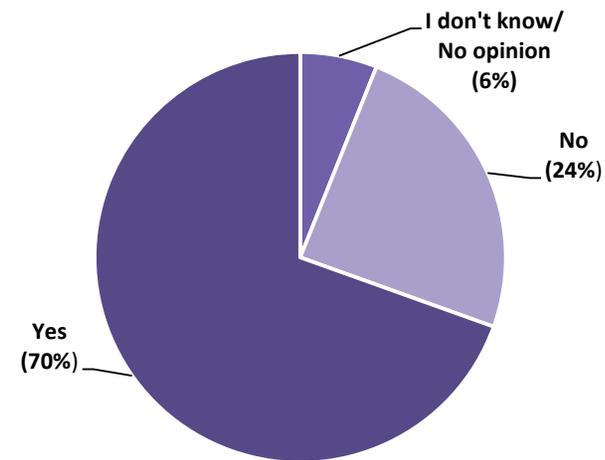
SUMMARY REPORT — Workplace culture

Workplace complaints. The City provides employees with a dedicated avenue for filing equity-related complaints via the Department of Diversity, Equity and Inclusion (DEI). Under its “Investigations” function, DEI receives and investigates complaints of discrimination or harassment in employment.⁷ Specifically, in the “Complaint Procedure” section of the City’s Policy Against Discrimination and Harassment, employees are instructed to report concerns through DEI or contact a Human Resources representative or supervisor.⁸

As shown in Figure 10, about 70 percent of employees reported that they would know where to go within the City to file a workplace complaint should they need to. However, about a quarter of employees reported not being aware of how to file a complaint. Men and women reported similar levels of awareness about where to file a workplace complaint.

Employees were specifically asked if they would know how to file a complaint or union complaint related to bullying, sexual harassment, discrimination, workplace violence and safety. “Discrimination” was the topic where the most employees (30%) said they did not know how to file a complaint or grievance.

10. Whether participants reported knowing where to go within the City to file a workplace complaint



Note: N = 479.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

⁷ City of Toledo website. Retrieved on November 7, 2025, from <https://toledo.oh.gov/employee-resources/discrimination-harassment-complaint>.

⁸ City of Toledo website. Retrieved on November 7, 2025, from <https://cdn.toledo.oh.gov/uploads/documents/Human-Resources/Administrative-Policies/AP-071-Policy-against-Discrimination-and-Harassment.pdf>

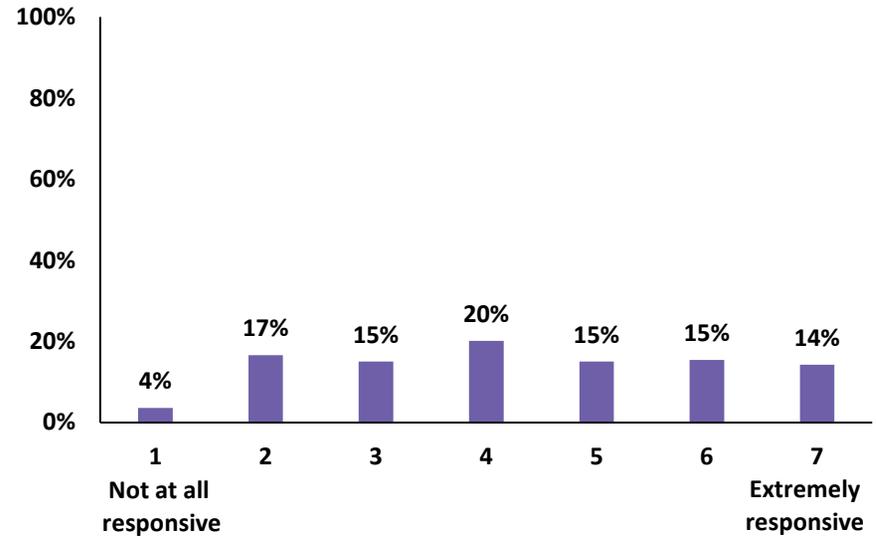
SUMMARY REPORT — Workplace culture

Responsiveness to complaints. As shown in Figure 11, among employees who gave answers to how responsive the City is to complaints, 36 percent indicated that the City is not very responsive (selected a rating of 3 or lower). Female employees were more likely to give lower scores regarding City responsiveness than male employees. More than half (53%) of male participants reported that the City is responsive to complaints (selected a rating of 5 or higher) compared to 40 percent of female participants.

Employees gave suggestions for the City to address instances of discrimination, bullying or sexual harassment that included:

- Education and training;
- Fear of retaliation is a barrier to sharing;
- Unbiased and timely investigations;
- Accountability of leadership; and
- Improvement of reporting practices.

11. Participants' ratings of how responsive the City is to employee complaints



Note: N = 253.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

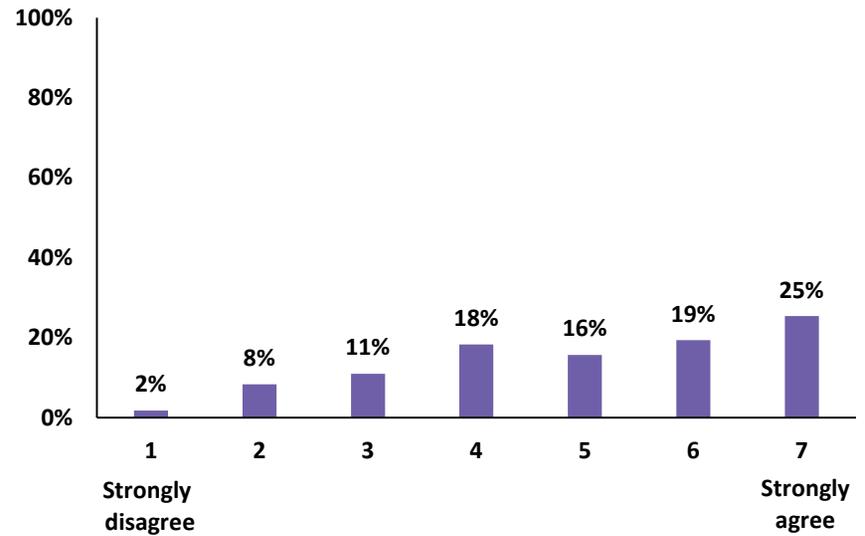
SUMMARY REPORT — Workplace culture

Support and resources. About 60 percent of employees agreed or strongly agreed that they receive the support needed to succeed in their respective jobs. About 21 percent of employees did not feel they received the support and resources needed, as shown in Figure 12. Men and women reported similar perceptions regarding availability of workplace support and resources.

Employees noted the following as reasons for not feeling supported in their current role:

- Outdated resources and equipment;
- Lack of sufficient training;
- Need for more support from managers; and
- Increased workload without adequate compensation.

12. Employees' perception that they receive needed support to succeed in their current job



Note: N = 382.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Gender equity and fairness

Employee perspectives and pay data were analyzed to assess how gender equity and fairness are reflected in both perceptions and outcomes.

Gender Discrimination

Two-thirds of employees (66%) reported that the City is achieving its goal of working to eliminate gender discrimination in the workplace. About 15 percent indicated that the City is poorly achieving this goal.

Male employees were more likely to positively respond that the City was achieving this goal (77%) compared to female respondents (66%). Almost a quarter (22%) of employees of color reported that the City was not doing well achieving this goal in comparison to the 8 percent of employees who identified as white.

Some participants indicated that there is no gender discrimination at the City. Examples are shown on the top right side of the page.

Other interviewees reported that gender discrimination continues to be an issue at the City. Examples of comments are shown on the bottom right side of the page.

I feel both genders are given equal opportunities.

White female employee

Gender is not a factor. Who you are friends with is what matters here.

African American male employee

There is no discrimination. If anything, females are provided greater opportunity.

Employee

Men are treated differently from women. Men can say or do something and get away with it. Women can say or do the exact same thing and get disciplined for it because it is unprofessional. Like saying a swear word or slamming a door.

White female employee

Women are treated differently and poorly.

African American female employee

I'm not sure if we're doing anything for gender discrimination. Or I am not aware of anything.

Employee

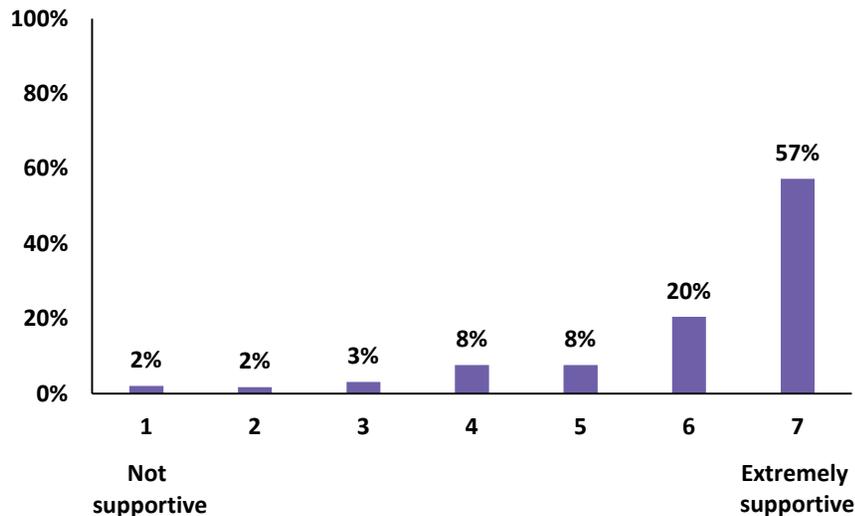
SUMMARY REPORT — Gender equity and fairness

Direct Supervisor Role

As shown in Figure 13, a large portion of employees (85%) indicated that their direct supervisor is supportive of the City’s goal of eliminating gender discrimination (selected a rating of 5 or higher). Only 7 percent of respondents indicated that their supervisor was unsupportive of this goal (chose a rating of 3 or lower).

Women of color were the least likely of all groups to report perceiving their supervisors as supportive of the goal (63%, compared to 85% of all respondents) and 19 percent reported that their supervisors were not supportive.

13. Participants’ ratings of how supportive their direct supervisor is in the City’s goal of eliminating gender discrimination



Note: N = 288.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

Employee suggestions for supervisors included the following:

- Increased fairness and equity in hiring and promotion practices;
- Leadership and people-skills training; and
- Increased support from senior leaders to supervisors.

Examples of comments are shown below.

Create and support development opportunities, provide evaluations, and be transparent about potential opportunities.

Female employee

Obtaining some training on how to be a leader.

African American female employee

They cannot impact gender discrimination. It comes from higher up.

Employee

SUMMARY REPORT — Gender equity and fairness

Nondiscrimination Training

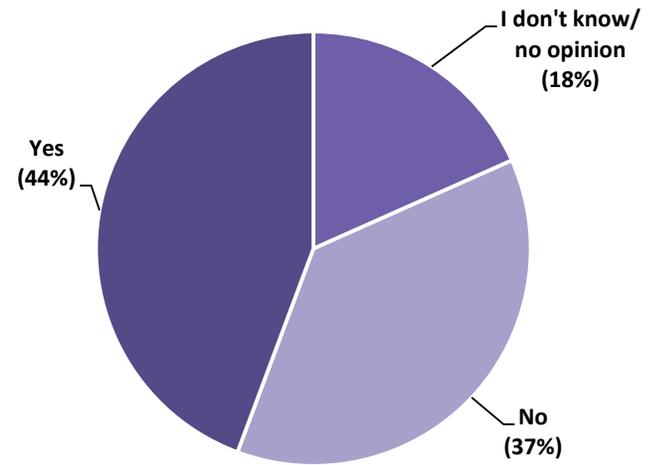
Approximately 44 percent of employees responded that they had attended a nondiscrimination training provided by the City, as shown in Figure 14. There were no notable differences between male and female employees in reported participation.

Employees indicated that they noticed little or nothing following the City's trainings while some indicated that they hope that the City continues the trainings.

Useful info but not upheld by all higher administrators.

White male employee

14. Whether respondents had attended nondiscrimination trainings with the City of Toledo



Note: N = 431.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Gender equity and fairness

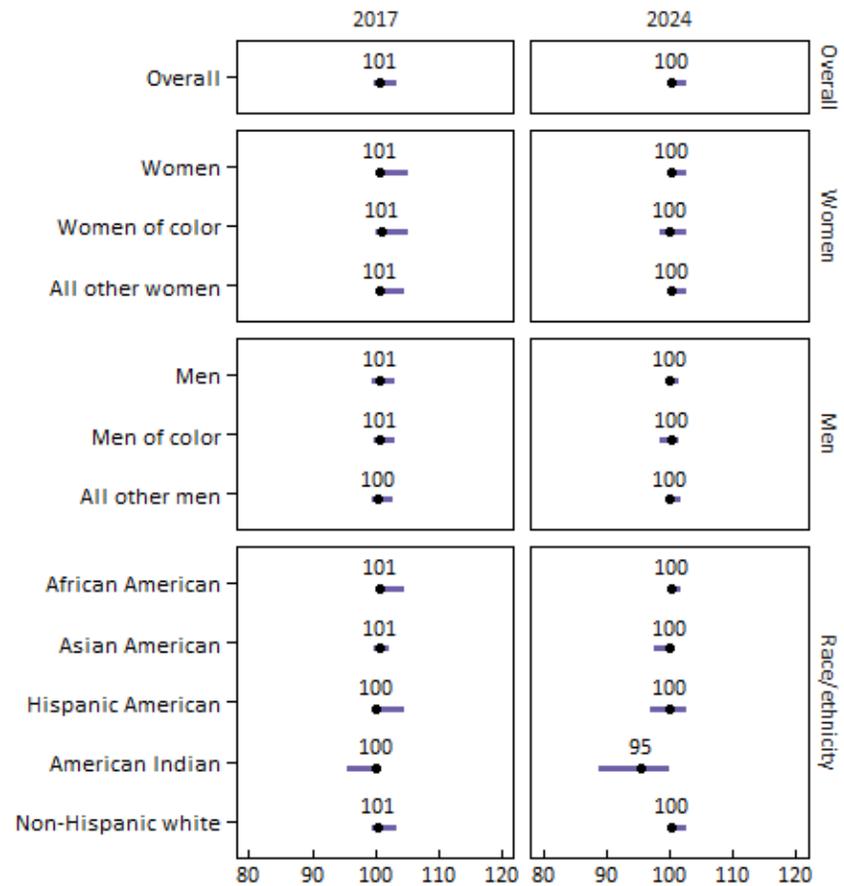
Pay Equity Analysis

Keen Independent analyzed the City’s employment data from 2017 through 2024 to determine whether there were wage disparities between demographic groups (see Appendix E). The analyses assessed overall wage differences, opportunities for advancement and wage growth, and patterns in hiring and pay over time.

Pay disparity analysis. A disparity score was developed to examine differences in hourly wages after accounting for the year of wage data and the employee’s job title and occupation code. A score of 100 indicates that a City employee made the same as white men did (on average) in the same job title in the same year.

Figure 15 shows the score median and interquartile range for each demographic group, by gender and race. Focusing on the medians (mostly “100” or “101”), the analysis did not indicate a pattern of disparities in pay between women and men with the same job title. Median disparity scores were almost near parity, with some notable exceptions, including somewhat lower than anticipated median wages for American Indian employees for their job titles using data for 2024.

15. Average pay disparity score by gender and race, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group. A wider range means more variation in wages compared to similar workers for that group (positive, negative or both). A narrower range indicates more consistency in results for that group.

Source: City employee data, 2017–2024.

SUMMARY REPORT — Gender equity and fairness

Regression analysis. The disparity score described above was also used to assess whether gender or race has a significant effect on the occupation-adjusted pay disparity index. The regression analyses estimate the correlation between immutable employee characteristics (such as gender, race and ethnicity) and the disparity score. The study team statistically controlled for explanatory variables (see Appendix E).

No evidence of lower average pay for women relative to men in the same job title was found. Results did find statistical significance differences in disparity scores for African American men and Asian men. However, the magnitude of these coefficients were relatively small. African American men are estimated to make about 1 percent less than white men in the same job title and Asian American men are estimated to make about 2 percent less. There could be explanations other than race for these disparities that were not revealed in the regression models.

Wage growth analysis. Keen Independent examined how employees' pay progressed over the course of their City careers, measuring changes from their starting hourly rate to compare wage growth across demographic groups.

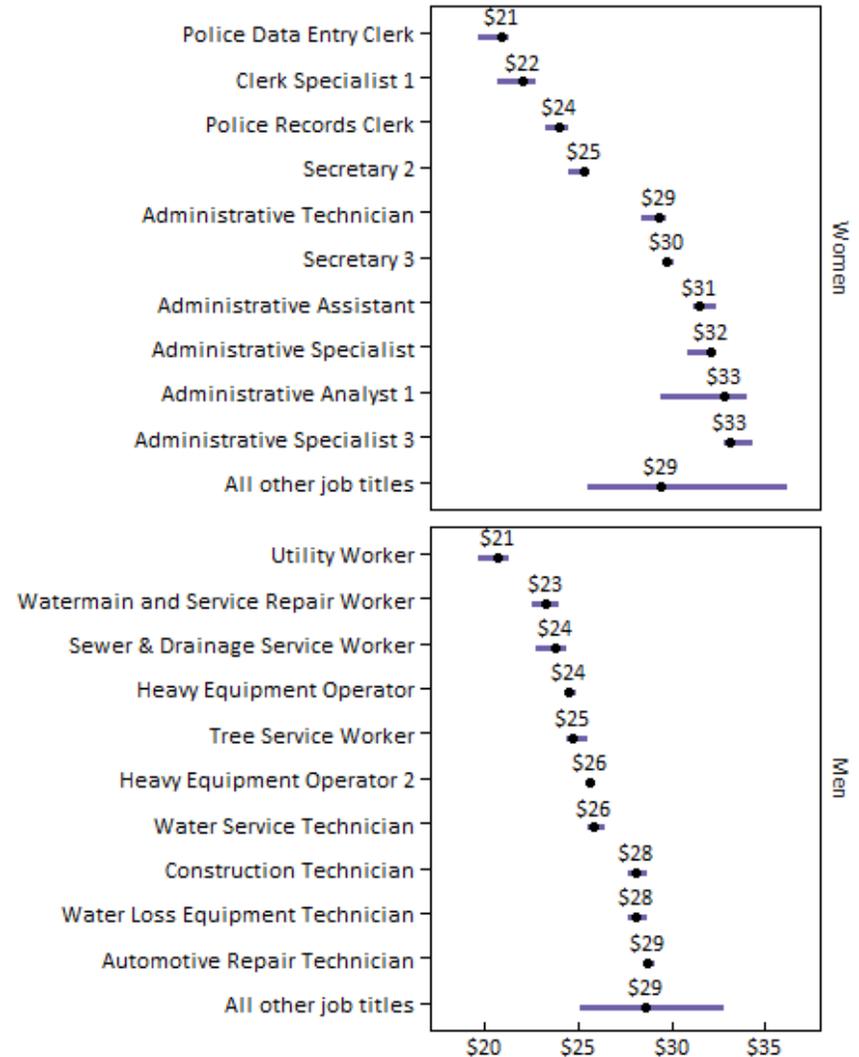
The analysis showed that women and men experienced similar rates of wage growth over their tenure with the City, with no gender disparities identified.

SUMMARY REPORT — Gender equity and fairness

Gender concentration analysis. Keen Independent analyzed whether job titles predominantly held by women paid less than those held mostly by men. Using City wage data adjusted for inflation, women working in female-concentrated roles earned a median hourly wage of \$25.70, about 4 percent lower than the \$26.80 median hourly wage for men in male-concentrated roles.

Figure 16 shows the median hourly wages (adjusted for inflation) for the most female-concentrated and male-concentrated job titles at the City. There is no overall pattern that the most women-concentrated positions paid less than male-concentrated positions.

16. Median and interquartile range of inflation-adjusted hourly rate for gender-concentrated job titles, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group.

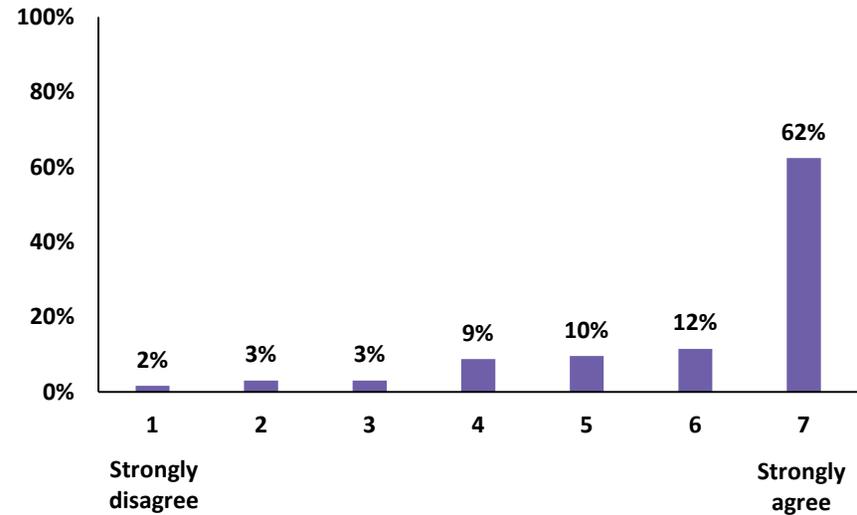
Source: City employee data, 2017–2024.

SUMMARY REPORT — Gender equity and fairness

Employee perceptions of pay equity. Employees were asked in the climate survey (Appendix C) if they believe that the City pays employees equally for the same job title and description. About 84 percent of employees indicated that they do believe the City provides fair compensation, as shown in Figure 17.

Although most women responded positively to the wage equity question, female employees (12%) were four times more likely than male employees (3%) to report that they disagreed that City employees received equal pay for same job and title.

17. Participants' belief that the City pays employees equally for the same job title and description



Note: N = 364.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

SUMMARY REPORT — Gender equity and fairness

Results from other survey questions confirm this generally favorable assessment of wage equity. Most employees viewed City efforts to eliminate gender-based pay discrimination positively. About 79 percent of survey respondents indicated that the City was doing well or very well in efforts to eliminate gender discrimination in pay.

However, not all employees shared this perception. About 10 percent of respondents believed their pay was impacted by their gender. This was higher for female employees at about 15 percent compared with only 4 percent for males.

The following quotes provide examples of feedback from female employees who perceived that gender influenced their pay (or ability to be reclassified).

I know that there are men who make more than me in the same role and I've been here longer and have a larger role than them.

African American female employee

Promotions, not pay directly.

White female employee

I believe that if I was a male, my previous boss would have reclassified me a long time ago.

White female employee

The fact is that there are more males with higher positions than females. Also, females still are paid less than male counterparts even though their work is the same or similar.

White female employee

SUMMARY REPORT — Gender Equity Action Plan overview

Conclusions

Based on the qualitative and quantitative information collected and analyzed, City leadership might consider taking specific actions to further advance gender equity throughout City operations.

Keen Independent developed the following conclusions that informed our development of recommendations included in the City of Toledo Gender Equity Action Plan.

- Although City managers have the option to give feedback to staff at their discretion, the City does not currently appear to follow a consistent and structured performance evaluation process across all staff.
- While the City now shares information regarding promotions to potential applicants who are already employed by the City, study results indicated some lack of awareness of career pathways and opportunities for advancement for current employees.
- Study data demonstrated that key employment and workplace expectations are shared with new hires during onboarding, though it is not consistent across departments.
- The City offers staff the opportunity to share feedback through an exit interview at the time of resignation. However, information collected by the study team indicated that feedback is not consistently considered or addressed to promote City equity initiatives.
- Data from the employee climate survey and staff interviews (see Appendices C and F) highlighted some gaps in communication between leadership and staff, especially regarding the City's efforts to advance gender equity throughout organizational practices.
- While the City has established an Employee Engagement Committee to give staff the opportunity to share issues and other feedback, the City does not consistently collect employee feedback through other mechanisms.
- The City is currently in the process of implementing a new employee data tracking system, as it does not have a comprehensive system in place. This will help the City perform its own analyses in the future that mirror those presented in the report.
- Study findings show the need for the City to collect and maintain accurate demographic data for all employees. With better information in the future, the City can assess long-term impacts of its workforce equity initiatives.

SUMMARY REPORT — Gender Equity Action Plan overview

Based on the information discussed in this Summary Report and the supporting appendices as well through discussions with City staff, Keen Independent developed a Gender Equity Action Plan.

Plan Overview

The study team developed high-level recommendations that include the following:

- Equity goals;
- Operational strategies (actions);
- Operational strategies (resources);
- Examples of key performance indicators; and
- Timeline for implementation.

To support the recommendations, Keen Independent created an Equity Checklist consisting of seven steps to guide City leadership in decision-making, and to provide short- and long-term support to the City.

Figure 18 on the right summarizes these recommendations. Additional detail and the complete proposed actions are presented in in Figure ES-1 at the beginning of this report and in the Gender Equity Action Plan.

18. Gender Equity Action Plan summary of recommendations

Recommendations

1. Equity in employment practices

- 1-1. Develop and maintain clear and accessible policy language
- 1-2. Standardize performance criteria and promotion procedures
- 1-3. Clearly communicate career advancement pathways
- 1-4. Establish and implement structured onboarding and offboarding procedures

2. Decision-making and communications

- 2-1. Increase transparency by Leadership in all decision-making processes
- 2-2. Create feedback loops to inform decision-making

3. Data systems

- 3-1. Strengthen and maintain more comprehensive Human Resources (HR) data systems and employee data tracking
 - 3-2. Use employee data to support equity initiatives
-

GENDER EQUITY ACTION PLAN — Executive Summary

The City of Toledo engaged Keen Independent Research in September 2024 to conduct a gender equity analysis of the City’s workplace practices and procedures and provide recommendations on how to improve. The assessment was completed by October 2025.

Study Overview

The purpose of the study was to provide the City with customized recommendations for supporting gender equity internally within the workplace. Major objectives included:

- Highlighting the City’s areas of strength;
- Identifying areas where challenges and barriers exist; and
- Identify resources needed to implement changes.

Methods. Keen Independent examined past City studies, reviewed policies and procedures, performed comparative analysis of other cities and examined best practices as a part of this effort. Nearly 2,500 City employees were asked for input that informs us of our recommendations.

Limitations. Keen Independent gathered data from a variety of internal and external sources to provide information that is useful for reviewing the City’s policies and data as of mid-year 2024. Organizational conditions constantly change and this analysis is based on data available at the time without knowledge of future conditions.

Keen Independent cannot express or imply representation or warranty on all the data sources and resulting analyses in this report, which draw on a combination of primary and secondary research. We take precautions to ensure the accuracy of all primary research data and to evaluate the reliability of secondary sources to the extent possible.

Summary of Recommendations

The following recommendations outline strategies for the City to enhance gender equity. The action plan discusses each recommendation in greater detail and practical next steps.

1. Equity in employment practices:

- Develop and maintain clear and accessible policy language.
- Standardize performance criteria and promotion procedures.
- Clearly communicate career advancement pathways.
- Establish and implement structured onboarding and offboarding procedures.

2. Decision-making and communications:

- Increase transparency by Leadership in all decision-making processes.
- Create feedback loops to inform decision-making.

3. Data systems:

- Strengthen and maintain more comprehensive Human Resources (HR) data systems and employee data tracking.
- Use employee data to support equity initiatives.

GENDER EQUITY ACTION PLAN — Introduction

The City of Toledo engaged Keen Independent in the development of a Gender Equity Action Plan spanning five years to guide the City in its efforts to continue to advance gender equity throughout all City operations.

Gender Equity Action Plan

The Gender Equity Action Plan was built on input from City staff and leadership. Keen Independent designed the plan to guide the City as it continues its efforts to increase gender equity throughout all City operations. This plan should be considered a living document that is designed to evolve to meet the needs of City staff and leadership. This plan is organized into the following sections:

- Introduction;
- Overview of recommendations and equity goals;
- Equity checklist;
- Recommendations; and
- Next steps.



GENDER EQUITY ACTION PLAN — Introduction

Alignment with Organizational Values

The City of Toledo Gender Equity Action Plan is designed in alignment with the City's eight values, defined below.

1. **Service mindset:** Understanding the needs of our colleagues and community and responding with high-quality solutions.
2. **Belonging:** Feeling valued through positive connections with others.
3. **Sense of purpose:** Committed to the outcome and knowing our direction and duty.
4. **Accountability:** Behaving the same way no matter who is present (or when no one is present).
5. **Respect:** Recognition and appreciation of other people's value regardless of their status, views, or any other differences.
6. **Efficiency:** Prioritizing quality service while minimizing time, effort and expense.
7. **Transparency:** Open and honest sharing of information and knowledge.
8. **Growth and Development:** Creating a growth-oriented atmosphere that empowers employees to develop knowledge and skills to advance in one's career.⁹

⁹ <https://toledo.oh.gov/eec/values>

Using the Gender Equity Action Plan

The Gender Equity Plan includes suggested operational strategies, including actions and required resources, key performance indicators and other evaluation factors. With time and as resources change, priorities also evolve.

This plan identifies high-level recommendations, equity goals, operational strategies, and key performance indicators for progress monitoring. Keen Independent also developed an Equity Checklist for City leadership to reference prior to adjusting or implementing any new policies, initiatives, programs or budgets.

At the time of preparing this document, many of the goals, strategies and actions may already be underway within City. This plan can be used to strengthen current initiatives and build new efforts that fill any gaps in promoting equitable processes and practices.



GENDER EQUITY ACTION PLAN — Overview of recommendations and equity goals

Recommendations Aligned with CEDAW Principles

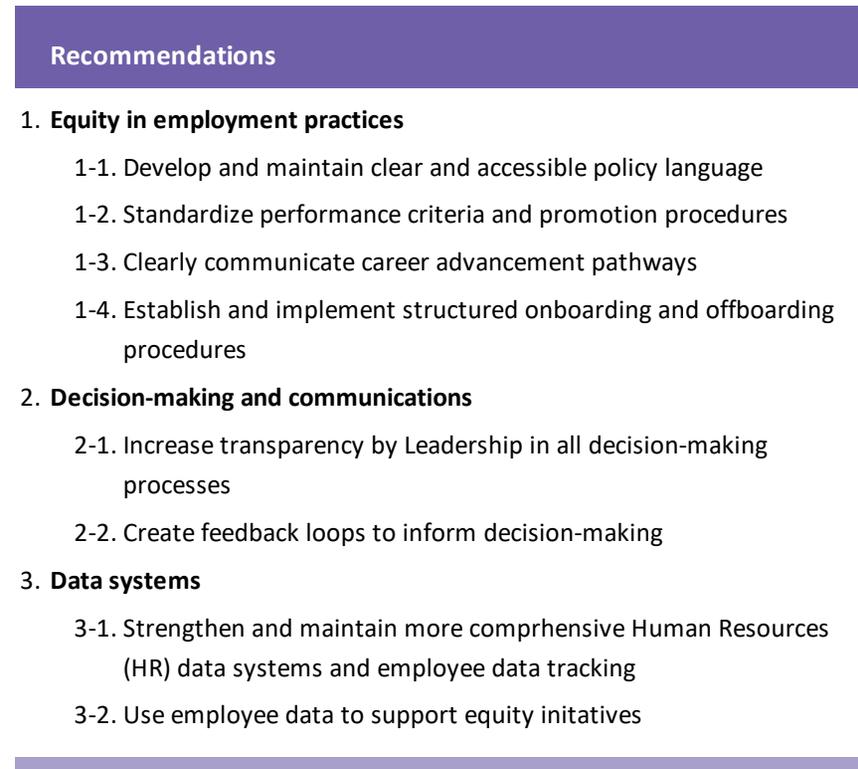
The following recommendations are designed to strengthen the City’s efforts to advance gender equity and are guided by the principles of the United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). In 2022, the City formally adopted CEDAW through Ordinance 95-22, establishing Chapter 184 of the Toledo Municipal Code to implement its principles locally.¹⁰

This ordinance underscores the City’s commitment to addressing discrimination against women in areas such as employment, economic development, political representation, education, healthcare and gender-based violence.

These recommendations build on global standards while responding to the City’s local context, providing a roadmap for practical steps that promote fairness, transparency and inclusivity in policies and practices.

See Figure 1 on the right for more detail.

Figure 1. Primary action steps



¹⁰ City of Toledo. (2022). Chapter 184: Local Implementation of United Nations CEDAW. Toledo Municipal Code. https://codelibrary.amlegal.com/codes/toledo/latest/toledo_oh/0-0-0-161437.

GENDER EQUITY ACTION PLAN — Equity checklist

Equity Checklist

To ensure lasting impact, the City should adopt an iterative process when implementing any new policies, programs and practices within the organization. The following seven steps can guide leadership as they continue to prioritize equity at the City.

Figure 2. Equity checklist

City of Toledo Equity Checklist	
Step 1	Identify the problem
Step 2	Assess the problem through an equity lens
Step 3	Understand the problem and its causes
Step 4	Identify outcomes to increase equity
Step 5	Identify necessary input
Step 6	Determine sustainable implementation and metrics
Step 7	Report back and adjust efforts as necessary

1. Identify the problem. The City leaders should begin the decision-making process by clearly identifying and defining the problem.

2. Assess the problem through an equity lens. After clearly identifying the problem, and before developing and implementing a new policy, initiative, program or budget, the City leadership should thoroughly assess the problem through an equity lens and in alignment with the City’s organizational values and pillars of equity.

The problem can be assessed through a structured framework or through other means, such as formal discussions between members of the City leadership team.

3. Understand the problem and its causes. After a problem is identified, assessed and determined to be equity-related, City leaders should work to understand: (a) the issue, (b) related underlying problems that contribute to the issue, and (c) additional causes. Step 3 can be performed in a variety of ways, including the following:

- Engaging with staff at various levels through employee surveys and other means for collecting feedback.
- Performing comparative research to understand how other agencies have approached similar issues.
- Facilitating discussions with or guidance from outside experts.

City leadership should analyze all feedback and work to identify common themes and findings. Data and findings should be retained for future evaluation to measure on-going successes and identify areas for improvement described in Steps 6 and 7.

GENDER EQUITY ACTION PLAN — Equity checklist

4. Identify outcomes to increase equity. Following Step 3, City leaders should work to determine the organization’s desired outcomes of the proposed policy, initiative, program or budget adjustment, as they relate to gender equity. The City might also consider outlining both short- and long-term goals. The outcomes identified in Step 4 should be consistent with the City’s values and its position as a CEDAW city.

As part of this step, the City leaders should identify what groups will benefit from the proposed policy, initiative, program or budget adjustment.

5. Identify necessary input. The City leaders should determine the necessary inputs (e.g., strategies, resources and efforts) to maximize the equity impact and to minimize any potential barriers or disadvantages.

6. Determine sustainable implementation and metrics. The necessary inputs identified in Step 5 should be implemented in a sustainable and accountable way by City leadership. All responsible parties should track the progress of the policy, initiative, program or budget using appropriate progress monitoring metrics and results should be shared with City leadership at regular intervals.

Efforts are sustainable when adequate staff, budget and consideration are applied through the duration of the policy, initiative, program or budget. Therefore, Step 6 necessitates tracking of elements to maintain equity in operations.

7. Report back and adjust efforts as necessary. As appropriate, City leaders should share feedback and results of this process as well as any new or unresolved equity issues with other leaders and any other groups.



GENDER EQUITY ACTION PLAN — Recommendations

Recommendation 1. Equity in Employment Practices

Advancing gender equity requires employment practices that are supported by clear policies and procedures that promote clarity, fairness and transparency throughout the entire employee lifecycle. By addressing pathways to advancement, criteria for promotion and accessibility of policies, the City may reduce barriers that contribute to unequal outcomes.

Develop and maintain clear and accessible policy language.

Policies written in straightforward language support equity by eliminating ambiguity. They also reflect CEDAW's principles that include clear measures to eliminate discrimination.¹¹

The City may consider the following actions to develop and maintain clear and accessible policy language:

- Implement procedures to ensure employees understand where to access City policies (at onboarding, for example).
- Implement an equity lens review process to assess policy language for potential bias, exclusionary terms or unintended inequities.
- Pilot new or revised policy documents with small group of employees to gather feedback on clarity and usability.



¹¹ Convention on the Elimination of All Forms of Discrimination Against Women (1979). United Nations General Assembly resolution 34/180. Article 2. Retrieved on September 5, 2025, from <https://www.ohchr.org/en/instruments->

[mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women](https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women).

GENDER EQUITY ACTION PLAN — Recommendations

Standardize performance criteria and promotion procedures.

Transparent performance benchmarks and promotion processes reduce bias and create equal opportunities for advancement, aligning with CEDAW's principle of equality in employment evaluation.¹²

A clear, formal performance evaluation process provides measurable criteria to assess employee contributions and ensures consistency across the organization. Interviews with staff and findings from the City's previous 2018 internal study identified the absence of a formal performance evaluation process as a limitation in current workplace practices.¹³ Without a consistent system for evaluating employee performance, it is difficult to ensure transparency in decisions related to promotions and compensation.

The City might consider taking the following actions to standardize performance evaluations:

- Define measurable performance criteria tied to competencies, goals and organizational objectives.
- Implement regular evaluation cycles, including self-assessments, supervisor reviews and documented feedback.
- Provide guidance and training for supervisors to ensure consistent and equitable application of performance standards.
- Incorporate an equity review to identify and address potential disparities in evaluation outcomes.

Suggestions to standardize promotion procedures may include:

- Define eligibility requirements and criteria for advancement, including experience, performance benchmarks and professional development.
- Establish a clear, documented promotion process that includes employee application, supervisory recommendations and review by designated panel or HR.
- Ensure transparent communication of promotional decisions and rationale to all employees.
- Periodically review promotion procedures to confirm consistency, fairness and alignment with equity goals.

Implementing a Citywide evaluation and promotion framework ensures that performance expectations are clear, advancement opportunities are equitable, and supervisors can make consistent, well-documented decisions. This approach supports employees' understanding of career pathways, reduces inconsistencies across departments and strengthens the City's ability to monitor and address potential disparities in advancement.

¹² Ibid., Article 11 (c) and (d).

¹³ City of Toledo Employee Survey (2018), provided by the City.

GENDER EQUITY ACTION PLAN — Recommendations

Clearly communicate career advancement pathways.

Open communication about career pathways strengthens employee access to advancement and reflects CEDAW's emphasis on equal opportunities for promotion.¹⁴

The City could assist career advancement pathways with clearly defined and consistent communication with all employees. Transparent processes help employees understand the criteria for promotion, eligibility requirements and steps needed to progress in their careers. The City may consider the following actions to establish clear communications:

- Document and publish promotion criteria and procedures in an accessible format.
- Provide regular information sessions or training on career development and advancement opportunities.
- Equip managers and supervisors to communicate pathways consistently and support employees in career planning.
- Establish feedback channels for employees to ask questions or seek guidance on advancement processes.

Clear communication of career advancement pathways supports an equitable and motivated workforce by helping employees understand how to grow and succeed within the organization.

¹⁴ Convention on the Elimination of All Forms of Discrimination Against Women (1979). United Nations General Assembly resolution 34/180. Article 11 (b) and (c). Retrieved on September 5, 2025, from <https://www.ohchr.org/en/instruments->

[mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women](https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women).

GENDER EQUITY ACTION PLAN — Recommendations

Establish and implement structured onboarding and offboarding procedures. Robust onboarding and exit processes strengthen support throughout the employment journey and advance CEDAW’s call for fair and equitable working conditions.¹⁵ In addition, consistent and transparent communication during onboarding and beyond provides employees with equitable access to organizational knowledge and resources, reinforcing the principles of fairness and inclusion outlines in CEDAW.¹⁶

Onboarding. The City could embed equity into the onboarding process to ensure all new employees start with the same knowledge, access and opportunities. The City may consider the following actions to achieve this goal:

- Standardize onboarding materials and processes that clearly communicate the City’s equity commitments, policies, procedures and advancement pathways.
- Structure new hire orientation activities that provide equitable access to resources, mentorship and support networks for all employees.
- Equity checkpoints to verify that all departments are consistently applying onboarding practices, preventing disparities in information and access.
- Establish a communication process so that department supervisors are informed of onboarding procedures, timelines and content.
- Feedback mechanisms during onboarding to capture early insights into employee experience and identify potential gaps in equity and inclusion.

¹⁵ Ibid., Article 11.

¹⁶ Ibid., Article 11.

GENDER EQUITY ACTION PLAN — Recommendations

Offboarding. The City could structure exit interviews to collect data on equity-related experiences, helping the City identify systemic barriers and inform improvements to policies and practices. To be most effective, this should be a formalized process with consistent documentation and regular review, creating a feedback loop between departing employees and organizational learning. The City may consider the following:

- Instruct HR to conduct exit interviews to ensure consistency, confidentiality and candid responses across departments.
- Update the City's offboarding policy to include standardized procedures for conducting and documenting exit interviews, clarifying roles, timelines and data management expectations.
- Update exit interview protocols to include prompts about fairness, compensation and opportunities for career advancement to identify potential systemic barriers and equity-related concerns.
- Clearly communicate how employee feedback will be used, emphasizing confidentiality, data protection and City's commitment to non-retaliation.
- Establish a formal mechanism for analyzing exit interview data on a regular basis. Summarize findings to identify patterns and report themes to leadership. Use this information to inform workplace planning, policy revision and equity strategies.

Figures 3 and 4 on the following pages summarize Recommendation 1 and include operational resources, strategies and examples of key performance indicators for the City's consideration.

GENDER EQUITY ACTION PLAN — Recommendations

Figure 3. Recommendation 1: Equity in employment practices

Equity goal	Operational strategies: Actions	Operational strategies: Resources	Examples of key performance indicators	Timeline
1-1. Develop and maintain clear and accessible policy language	Review and revise policies to ensure clarity and accessibility	<ul style="list-style-type: none"> a. Staff time b. Survey 	<ul style="list-style-type: none"> a. Updated policies available to all employees b. Feedback from employees 	Year 1
1-2. Standardize performance criteria and promotion procedures	Develop and standardize performance evaluation templates	Staff time	<ul style="list-style-type: none"> a. Developed performance evaluation template with measurable criteria b. Supervisor training c. Calibration sessions to ensure inter-departmental consistency d. Feedback from employees 	Year 1
	Develop and standardize promotion guidelines	Staff time	<ul style="list-style-type: none"> a. Developed promotion criteria tied to competencies b. Documentation outlining promotion steps and eligibility requirements c. Feedback from employees d. Annual review linked to performance criteria 	Year 2

GENDER EQUITY ACTION PLAN — Recommendations

Figure 4. Recommendation 1: Equity in employment practices (cont.)

Equity goal	Operational strategies: Actions	Operational strategies: Resources	Examples of key performance indicators	Timeline
1-3. Clearly communicate career advancement pathways	Create materials outlining career pathways and progression opportunities	Staff time	Career pathway materials developed	Year 2
	Establish regular communication and engagement around career growth	Staff time	<ul style="list-style-type: none"> a. Outreach efforts b. Development of structured engagement initiative (e.g., mentoring, coaching, peer learning or professional development series) 	Year 3
1-4. Establish and implement structured onboarding and offboarding procedures	Formalize offboarding procedures, including equity-focused interviews	Staff time	<ul style="list-style-type: none"> a. Revised offboarding procedures b. Percentage of exit interviews completed c. Number of equity-related insights captured 	Year 1
	Formalize onboarding procedures, including review of employment policies and procedures	Staff time	<ul style="list-style-type: none"> a. Revised onboarding procedures b. Feedback from employees c. Number of departments engaging in onboarding processes 	Year 1

GENDER EQUITY ACTION PLAN — Recommendations

Recommendation 2. Decision-making and Communications

Clear and consistent communication is central to fostering an equitable workplace. Establishing open channels for information-sharing and feedback allows employees to better understand organizational expectations while also contributing their perspectives to decision-making.

Increase transparency by leadership in all decision-making processes. Enhancing transparency in leadership decision-making fosters accountability, builds trust and aligns with CEDAW’s principles of non-discrimination and substantive equality.¹⁷ By consistently communicating existing and upcoming revisions to policies and sharing updates on equity initiatives and strategic goals, the City can support employees in being informed and supporting fairness and inclusion in the workplace.

The City could implement the following to increase transparency in leadership decision-making:

- Regular leadership updates through quarterly newsletters to share updates.
- Open forums or town hall meetings where leaders share and discuss updates.
- Maintain an internal online dashboard that includes all relevant communications and updates.
- Include departmental debriefings as a part of regular team meetings to support consistent communication.

¹⁷ Ibid., Article 11.

GENDER EQUITY ACTION PLAN — Recommendations

Create feedback loops to inform decision-making.

Structured feedback channels give employees a voice in shaping organizational policies and practices, supporting CEDAW’s principle of equal participation in decision-making.¹⁸

Establishing structured feedback loops allows the City to collect input from employees, identify areas for improvement and make data-informed decisions. Feedback mechanisms ensure that employee perspectives are heard, support continuous improvement and promote a culture of transparency and accountability.

To create feedback loops, the City may consider the following:

- Administer a regular employee survey, such as the City’s Climate Survey (Appendix C) to gather insights into workplace experiences, policies and processes. Results should be analyzed and shared with employees.
- Conduct focus groups or listening sessions to collect qualitative feedback on specific programs or initiatives.
- Provide dedicated channels for ongoing input, such as online portal or scheduled “office hours” with HR or leadership.
- Implement transparent follow-up processes so employees understand how their feedback is considered and applied.
- Review feedback across departments to identify trends, gaps and opportunities for consistent improvement.

Figure 5 on the following page summarizes Recommendation 2 and includes operational resources, strategies and examples of key performance indicators for the City’s consideration.

¹⁸ Ibid., Article 7 (b).

GENDER EQUITY ACTION PLAN — Recommendations

Figure 5. Recommendation 2: Decision-making and communications

Equity goal	Operational strategies: Actions	Operational strategies: Resources	Examples of key performance indicators	Timeline
2-1. Increase transparency by Leadership in all decision-making processes	Communicate existing and upcoming revisions to all policies	<ul style="list-style-type: none"> a. Communications platforms b. Staff time 	Track employee attitudes toward policies through various feedback mechanisms	Year 2
	Communicate updates on equity initiatives and strategic goals	<ul style="list-style-type: none"> a. Communications platforms b. Staff time 	<ul style="list-style-type: none"> a. Frequency of communication updates b. Employee feedback 	Year 2
2-2. Create feedback loops to inform decision-making	Formalize mechanisms for collecting, tracking and reviewing employee feedback	<ul style="list-style-type: none"> a. Communications platforms b. Staff time 	<ul style="list-style-type: none"> a. Feedback mechanisms implemented (e.g., surveys, portals) b. Number of employees submitting feedback c. Frequency of feedback review by leadership/HR 	Year 3
	Communicate feedback outcomes and integrate input into decision-making	<ul style="list-style-type: none"> a. Communications platforms b. Staff time 	<ul style="list-style-type: none"> a. Number of feedback summaries shared with employees b. Percentage of actional feedback items addressed c. Employee perception of feedback influences on decisions 	Year 3

GENDER EQUITY ACTION PLAN — Recommendations

Recommendation 3. Data Systems

Strong organizational infrastructure sets the foundation for sustained progress toward equity. Investing in reliable systems, consistent processes and comprehensive data collection helps the City monitor progress, support employees at all stages of employment and build accountability into organizational practices.

Strengthen and maintain more comprehensive HR data systems and employee data tracking. Comprehensive HR data systems provide insight into equity outcomes and make it possible to identify and address gaps, in keeping with CEDAW’s requirement for effective measures to eliminate discrimination.^{19,20}

While new HR data systems are in development, the City should also prioritize maintaining data accuracy by incorporating quality control procedures. Consistency through regular updates, staff training and cross-departmental coordination is suggested.

Use employee data to support equity initiatives. Robust and well-maintained employee data systems enable the City to monitor workforce trends and identify inequities. Using this information to make informed decisions supports fair and inclusive practices, reflecting CEDAW’s principles of promoting equal opportunities and eliminating discrimination in employment.²¹

To use employee data to support equity initiatives the City could consider the following:

- Integrate equity-related measures in workforce planning.
- Use data to assess impact of current policies and programs.
- Continue to analyze employee pay promotions, and retention patterns to identify disparities.
- Share insights with departments to encourage accountability and informed decision-making.

Figure 6 on the following page summarizes Recommendation 3 and includes operational resources, strategies and examples of key performance indicators for the City’s consideration.

¹⁹ Ibid., Article 2.

²⁰ Convention on the Elimination of All Forms of Discrimination Against Women (1989). United Nations General Assembly resolution, General Recommendation No. 9 Statistical data concerning the situation of women. Retrieved on September 5, 2025, from

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/TBSearch.aspx?Lang=en&TreatyID=3&DocTypeID=11.

²¹ Ibid., Article 11.

GENDER EQUITY ACTION PLAN — Recommendations

Figure 6. Recommendation 3: Data systems

Equity goal	Operational strategies: Actions	Operational strategies: Resources	Examples of key performance indicators	Timeline
3-1. Strengthen and maintain more comprehensive HR data systems and employee data tracking	Implement HR data system improvements	<ul style="list-style-type: none"> a. HR data system b. Staff time 	<ul style="list-style-type: none"> a. HR system updates b. Employee records verified in new system c. Number of data accuracy or reporting issues identified and resolved 	Year 1
	Train staff to use data systems	<ul style="list-style-type: none"> a. Staff time b. Post-training evaluation 	<ul style="list-style-type: none"> a. Percentage of HR and management staff trained on system b. Post-training evaluation to gauge staff knowledge 	Year 1
3-2. Use employee data to support equity initiatives	Integrate equity metrics into workforce planning and decision-making	<ul style="list-style-type: none"> a. HR data system b. Staff time 	<ul style="list-style-type: none"> a. Inclusion of equity metrics in annual workforce planning reports b. Frequency of data reviews 	Year 4
	Apply data findings to inform equity-related policies, procedures and programs	<ul style="list-style-type: none"> a. HR data system b. Staff time 	<ul style="list-style-type: none"> a. Number of actionable recommendations b. Percentage of recommendations implemented 	Year 4

GENDER EQUITY ACTION PLAN — Next steps

Next Steps

With the set of recommendations, key metrics and equity checklist identified in this Gender Equity Action Plan, City leaders should consider the following steps:

1. Review all aspects of the recommendations identified in this Gender Equity Action Plan.
2. Review the Equity Checklist for usability across City decision-making processes.
3. Obtain approval and align leadership on the Gender Equity Action Plan recommendations and Equity Checklist.
4. Position leadership to embed elements of the recommendations and Equity Checklist into other organizational processes and plans.
5. Assign equity-related responsibilities to parties and ensure an understanding of duties.
6. Collaborate between departments to determine equity benchmarks.
7. Plan and allocate necessary resources (e.g., staff time and required budget).
8. Schedule check-ins with members of City leadership at regular intervals to assess progress.
9. Develop a strategy and plan for sharing recommendations and outcomes with stakeholders and reaffirm City leadership's commitment to the Gender Equity plan's success.



APPENDIX A. Comparative Analysis — Introduction

Keen Independent performed a comparative analysis of three cities that have passed a Convention on the Elimination of All Forms of Discrimination (CEDAW) ordinance or adopted a resolution. Appendix A provides an overview of the initiatives these cities have taken to increase gender equity.

Appendix A begins with background information related to CEDAW and selection criteria for the comparative analysis and detailed information about the gender equity-related initiatives taken by each city.

Background

CEDAW is an international treaty adopted by the United Nations in 1979 with the goal of ending discrimination against women and promoting gender equality. It outlines various measures that governments should implement to ensure women's rights, including equal access to education, employment, and political participation. CEDAW provides a framework for addressing and challenging gender-based discrimination across different sectors of society.

In the United States, more than 14 ordinances and 40 resolutions have been approved, with over 50 local coalitions actively pursuing CEDAW initiatives.²²

Selection criteria. The Keen Independent study team began by reviewing the demographic characteristics and historical context of the cities and counties that have passed CEDAW ordinances or have adopted resolutions.²³ Specific demographic factors, such as population, median household income, employment rate and educational attainment, were considered to ensure a comprehensive analysis of each location's unique context.

The study team evaluated the gender equity-related practices and initiatives of the following three cities:

- Cincinnati, Ohio;
- Kansas City, Missouri; and
- Pittsburgh, Pennsylvania.

Appendix A examines each of these city's current and planned efforts to address gender-related inequities.

²² Cities for CEDAW (2024). Cities for CEDAW. Retrieved on December 2, 2024, from <https://citiesforcedaw.org/>.

²³ Women's Intercultural Network (2023). CEDAW 2022-2023 Annual Report. Retrieved on November 27, 2024, from https://citiesforcedaw.org/wp-content/uploads/2023/09/CEDAW-22_23-Annual-Report-Final.pdf.

A. Comparative Analysis — Overview

Research. Keen Independent consulted publicly available resources such as city websites, policy documents and reports on gender equity initiatives.

- Current efforts;
- Oversight of efforts;
- Equal pay and salary transparency ordinances;
- Family and medical leave policies;
- Diversity and inclusion policies and committees; and
- Equity outcomes.

The study team also reached out to representatives from each city to gain further insight into each city’s gender equity-related initiatives. Insights from that outreach are included throughout this appendix.

Organization of the Appendix

This appendix is organized by city according to the following topics:

- Community profile;
- Citywide equity initiatives;
- Department-level initiatives; and
- Equity-related policies and procedures.

This appendix is not meant to provide an exhaustive list of gender equity efforts, programs and policies in each city, but rather to provide insight into how other CEDAW cities have addressed issues related to gender equity.

A. Comparative Analysis — Cincinnati, Ohio

Keen Independent examined internal equity efforts made by the City of Cincinnati, Ohio.

Community Profile

Key demographic characteristics of Cincinnati are listed below.

- Population: 311,097.²⁴
- Employment rate: 62 percent.²⁵
- Educational attainment (bachelor’s degree or higher): 40 percent.²⁶
- Median household income: \$49,191.²⁷
- CEDAW ordinance: Cincinnati became the seventh city in the U.S.²⁸ and the first in Ohio to pass a CEDAW-related ordinance in 2015.²⁹

A-1. View of Cincinnati, OH skyline from Mt. Adams



Source: Wikimedia Commons.

²⁴ U.S. Census Bureau 2023 QuickFacts. Cincinnati, Ohio. Retrieved November 27, 2024, from <https://www.census.gov/quickfacts/fact/table/cincinnati-city-ohio/HSD410222>.

²⁵ U.S. Census Bureau 2023 ACS 1-year estimates. Retrieved November 27, 2024, from https://data.census.gov/profile/Cincinnati_city,_Ohio?g=160XX00US3915000.

²⁶ U.S. Census Bureau 2018-2022 Educational Attainment ACS 5-Year Estimates. Retrieved November 27, 2024, from <https://www.census.gov/quickfacts/fact/table/cincinnati-city-ohio/HSD410222>.

²⁷ U.S. Census Bureau 2018-2022 Median Household Income ACS 5-Year Estimates. Retrieved on November 27, 2024, from <https://www.census.gov/quickfacts/fact/table/cincinnati-city-ohio/HSD410222>.

²⁸ City of Cincinnati (2024). Equity in Cincinnati. Retrieved on November 27, 2024, from <https://www.cincinnati-oh.gov/cityofcincinnati/equity-in-cincinnati/>.

²⁹ City of Cincinnati (2015). Equity in Cincinnati. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/cityofcincinnati/equity-in-cincinnati/resolution-making-cincinnati-a-cedaw-city-may-2015>.

A. Comparative Analysis — Cincinnati, Ohio

Citywide Equity Initiatives

Keen Independent examined the City of Cincinnati’s efforts as they relate to gender equity and other equity-related initiatives and plans. The City has taken numerous steps over the years to improve oversight and assess gender equity.

The Women’s Fund of the Greater Cincinnati Foundation.

The Women’s Fund has more than two decades of involvement in addressing women’s issues in the Cincinnati area.³⁰ Their work has influenced local policy, primarily through their PULSE studies, which explore a variety of gender equity topics. Their original PULSE study, released in 2005, helped precipitate the formation of the Gender Equality Task Force in 2017.

A-2. Women’s Fund logo



Source: <https://www.gcfndn.org/womensfund/>.

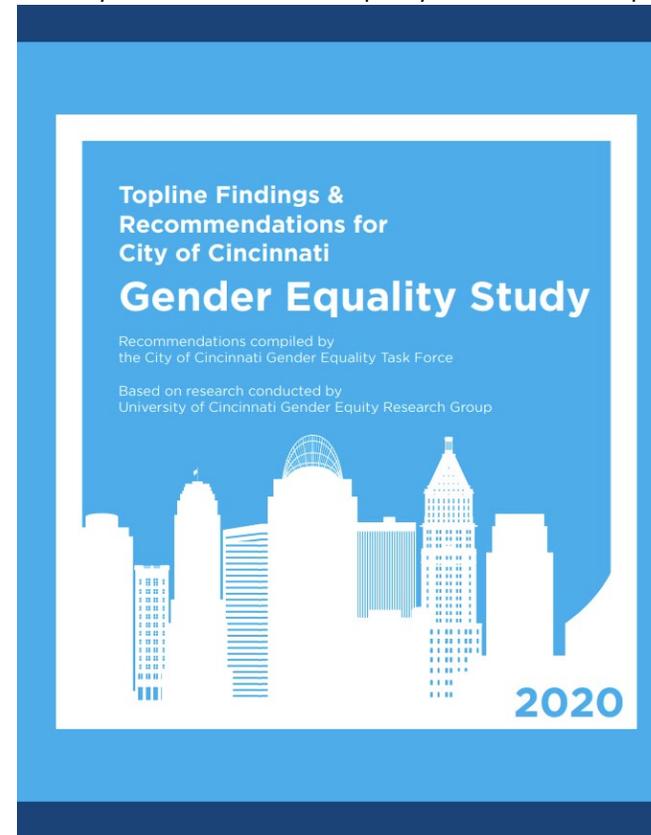
³⁰ Women’s Fund of Greater Cincinnati (n.d.). Our Impact. Retrieved on December 2, 2024, from <https://www.gcfndn.org/womensfund/>.

A. Comparative Analysis — Cincinnati, Ohio

Gender Equality Task Force. In 2017, Mayor John Cranley of Cincinnati appointed a Gender Equality Task Force of 14 women that was funded by the City of Cincinnati, the University of Cincinnati and multiple community organizations³¹ in response to the Women’s Fund of Greater Cincinnati’s PULSE report regarding gender pay equity.³²

One goal of the Task Force was to develop and oversee a gender analysis assessment that was conducted by the University of Cincinnati research team.³³ The Task Force developed a set of ten recommendations, including recommendations to establish a permanent gender equity division and to implement gender and race pay standards on all City contracts.³⁴

A-3. City of Cincinnati Gender Equality Task Force final report



Source: https://www.gcdfn.org/wp-content/uploads/2020/07/Visual-Summary_City-of-Cincinnati-Gender-Equality-Study_6_16_2020.pdf.

³¹ Noonan, S. & Cummings, M. (2020). Gender Equality Study. Retrieved on December 2, 2024, from https://www.gcdfn.org/wp-content/uploads/2020/07/Visual-Summary_City-of-Cincinnati-Gender-Equality-Study_6_16_2020.pdf.

³² Cummings, M. (April 24, 2017). Pulse Report: Applying a Gender Lens to the Wage Gap. Retrieved on December 2, 2024, from <https://www.gcdfn.org/wp-content/uploads/2020/07/6.-2017-Applying-a-Gender-Lens-to-the-Wage-Gap.pdf>.

³³ Noonan, S. & Cummings, M. (2020). Gender Equality Study. Retrieved on December 2, 2024, from https://www.gcdfn.org/wp-content/uploads/2020/07/Visual-Summary_City-of-Cincinnati-Gender-Equality-Study_6_16_2020.pdf.

³⁴ Noonan, S. and Cummings, M. (2020). Gender Equality Study. Retrieved on December 2, 2024, from https://www.gcdfn.org/wp-content/uploads/2020/07/Visual-Summary_City-of-Cincinnati-Gender-Equality-Study_6_16_2020.pdf, p. 4.

A. Comparative Analysis — Cincinnati, Ohio

In 2020, the University of Cincinnati Gender Equity Research Team presented the results of Phase One and Phase Two of the Gender Study to the Gender Equality Task Force. Major study findings included the following (the following list is non-exhaustive):

- Women and people of color make up the greatest share of employees in lower-paying City jobs;
- The slight majority of departments are primarily male;
- Departments consisting of caretaking jobs are predominantly comprised of women (where women do not make up the greatest portion of higher paying jobs);
- Women and men of color feel a lesser sense of equity and inclusion; and
- Workforce composition is not representative of city demographics.³⁵

The final report included ten recommendations for consideration by the City Council,³⁶ one of which was to develop a permanent gender equity department and commission following the study.³⁷

³⁵ University of Cincinnati Gender Equity Research Team (Jan. 24, 2024). Gender Study of City of Cincinnati Government Final Report. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/sites/cityofcincinnati/assets/File/FINAL%20Gender%20Study%20of%20City%20of%20Cincinnati%20Government%20Final%20Report%20by%20UC%20Gender%20Equity%20Research%20Team%20submitted%20to%20Gender%20Equality%20Task%20Force.pdf>, p. 4.

³⁶ Noonan, S. & Cummings, M. (2020). Gender Equality Study Visual Summary. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/cityofcincinnati/equity-in-cincinnati/visual-summary-for-the-city-of-cincinnati-gender-equality-study/>.

Following the Gender Study report, Task Force co-chairs have overseen efforts to increase gender equity by the City. The City has made the following progress (as of the 2022–2023 Cities of CEDAW report) to address inequities identified in the Gender Study final report:

- Applicant salary history is no longer requested in applications;
- The City Clerk’s office must disclose a job candidate’s demographic information before appointments to any City board or commission; and
- The Fire Department developed a peer support group.³⁸

Following completion of the University of Cincinnati’s gender equity assessment, all City staff were required to complete anti-sexual harassment, anti-discrimination and implicit bias training sessions.³⁹

All-In Cincinnati. All-In Cincinnati is a community-led coalition that focuses on dismantling racial inequities, especially within the Black community in Cincinnati. In 2021, All-In partnered with the City of Cincinnati to provide City officials and administration with racial equity training sessions.⁴⁰

³⁷ Cities for Women’s Intercultural Network (2023). CEDAW 2022-2023 Annual Report. Retrieved on November 27, 2024, from https://citiesforcedaw.org/wp-content/uploads/2023/09/CEDAW-22_23-Annual-Report-Final.pdf.

³⁸ Women’s Intercultural Network (2023). CEDAW 2022-2023 Annual Report. Retrieved on November 27, 2024, from https://citiesforcedaw.org/wp-content/uploads/2023/09/CEDAW-22_23-Annual-Report-Final.pdf.

³⁹ Keen Independent discussion with a public entity representative on Nov. 26, 2024.

⁴⁰ All-In Cincinnati. (2021). Policies to Prosper 2021 Overview. Retrieved on November 27, 2024, from https://www.gcdfn.org/wp-content/uploads/2020/07/2021-All-In_CommunityReport_Clickable.pdf.

A. Comparative Analysis — Cincinnati, Ohio

Department-Level Initiatives

The City of Cincinnati has implemented several equity-related initiatives at the department level.

Department Engagement Champions. As part of its commitment to increasing equity throughout all citywide operations, the City of Cincinnati developed an internal program that designates interested City staff as department liaisons. The purpose of the program is to increase engagement between staff and community members, and within the workplace. Staff can apply online to become a Department Engagement Champion.⁴¹

Cincinnati Police Department (CPD). The CPD has historically and more recently adopted initiatives to improve equity within the Department. Some of these initiatives continue, while one was recently overturned. In 2021, a white male officer sued CPD alleging he was passed over for a promotion due to his race. The court ruled in his favor, which ultimately overturned a 1981 decree that was aimed at promoting diversity in hiring and promotions.⁴²

In 2021, the CPD committed to the 30x30 Initiative, a national push to ensure women make up 30 percent of recruit classes by 2030. The pledge also focuses on supporting qualified women throughout their careers and removing systemic barriers that hinder the inclusion and success of women in law enforcement.⁴³

⁴¹ City of Cincinnati (n.d.). City Employee Champions. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/engage/city-employee-resources-and-links1/>.

⁴² Wilson, C. (2021). CPD's Race, Sex-based Hiring Practices Ruled Unconstitutional <https://spectrumnews1.com/oh/columbus/news/2021/09/17/cpd-s-minority-race-hiring-practices-overturned-by-court>.

A-4. City of Cincinnati ENGAGE program



Source: <https://joincincydpd.com/>.

The CPD supports policewomen through focused training, promotional preparation and a program called Empower, Nurture, Guide and Grow Employees (ENGAGE). ENGAGE is a community of female officers and civilian employees who advocate for women's rights.⁴⁴

⁴³ Cincinnati Police (2024). 30x30 Initiative. Retrieved on December 2, 2024, from <https://joincincydpd.com/30-30-initiative-draft/>.

⁴⁴ Cincinnati Police (2024). How Do We Support Our Police Women. Retrieved on December 2, 2024, from <https://joincincydpd.com/>.

A. Comparative Analysis — Cincinnati, Ohio

Ellequate. In 2018, Cincinnati City Council voted to have the Human Resources and Transportation and Engineering departments join Ellequate (formerly Queen City Certified). Ellequate promotes intersectional workplace equity through coaching, mentoring and promoting data-driven strategies.⁴⁵

Ellequate produced reports for each department that identified gender differences in satisfaction related to workplace recognition, compensation and advancement.⁴⁶ Recommendations included:

- Conduct annual audits of new hires, starting wages and promotion and retention practices;
- Develop and communicate a transparent compensation policy with employee performance measures and promotion criteria;
- Sponsor an inclusion council that includes a group of leadership from diverse backgrounds;
- Integrate gender equity into overall guidelines and strategic goals; and
- Create a list of employees, including women and underrepresented minorities, whose skills align with high profile or “glamour” projects. This list will ensure that opportunities are assigned and regularly rotated, providing everyone with equal access to impactful work experiences.^{47,48}

⁴⁵ Ellequate (2024). It’s Time to Reimagine the Workplace. Retrieved on December 2, 2024, from <https://www.ellequate.com/home#:~:text=Queen%20City%20Certified%20is%20the,pr ogram%20for%20intersectional%20workplace%20equity.>

⁴⁶ Ellequate (2018). Queen City Certified: Survey Analysis-City of Cincinnati Human Resources. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/cityofcincinnati/equity-in-cincinnati/qcc-cincinnati-hr-survey-analysis-fall-2018/>.

⁴⁷ Ellequate (2018). Queen City Certified: Survey Analysis-City of Cincinnati DOTE. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/cityofcincinnati/equity-in-cincinnati/qcc-cincinnati-dote-survey-analysis-fall-2018/>.

⁴⁸ Ellequate (2018). Queen City Certified: Survey Analysis-City of Cincinnati Human Resources. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/cityofcincinnati/equity-in-cincinnati/qcc-cincinnati-hr-survey-analysis-fall-2018/>.

A. Comparative Analysis — Cincinnati, Ohio

Equity-Related Policies and Processes

Keen Independent evaluated various policies and programs related to the City of Cincinnati's efforts to increase equity.

Pay equity laws. The City implemented equal pay and salary transparency laws, including the following.

Ohio Minimum Fair Wage Standards law. This law states that no employer shall discriminate on the basis of race, color, religion, sex, age, national origin or ancestry by paying an employee less than another employee for equal work. This applies to jobs that require equal skill, effort and responsibility, and which are performed under similar conditions.⁴⁹

Cincinnati Salary History Ban Ordinance. In 2019, the City of Cincinnati passed an ordinance prohibiting salary inquiries and promoting pay transparency. Key provisions include banning inquiries into an applicant's salary history and requiring the City to be transparent in pay range during the hiring process.⁵⁰

Following the passing of the ordinance, training sessions for employers regarding compliance with the ordinance were held through various chambers, including the Regional Chamber of Commerce, Hispanic Chamber of Commerce and African American Chamber of Commerce.⁵¹

Parental leave. In 2023, the City of Cincinnati enacted an updated Paid Parental Leave (PLP) for non-seasonal, full-time City employees. The PLP expanded parental leave from the previous plan through the following:

- Extends leave from the original plan of six weeks to 12 weeks paid at 100 percent of the employee's salary;
- Broadens the eligibility to employees in the adoption, fostering and legal guardianship processes; and
- Adds 20 hours of paid prenatal or pre-adoption leave that can be used for appointments prior to the birth or adoption.⁵²

⁴⁹ Legislative Service Commission (2000). Ohio Laws & Administrative Rules: Section 4111.17. Retrieved on December 2, 2024, from <https://codes.ohio.gov/ohio-revised-code/section-4111.17>.

⁵⁰ City of Cincinnati (2019). Ordinance No. 83. Retrieved on November 27, 2024, from cincinnati-oh.gov/cityofcincinnati/equity-in-cincinnati/city-of-cincinnati-s-salary-equity-ordinance/.

⁵¹ Keen Independent discussion with public entity representative on Nov. 26, 2024.

⁵² City of Cincinnati (January 1, 2023). Human Resources Policies and Procedures: 4.7 Parental Leave Policy. Retrieved on December 2, 2024, from <https://www.cincinnati-oh.gov/sites/hr/assets/File/HR/HRP&P4.7.pdf>.

A. Comparative Analysis — Kansas City, Missouri

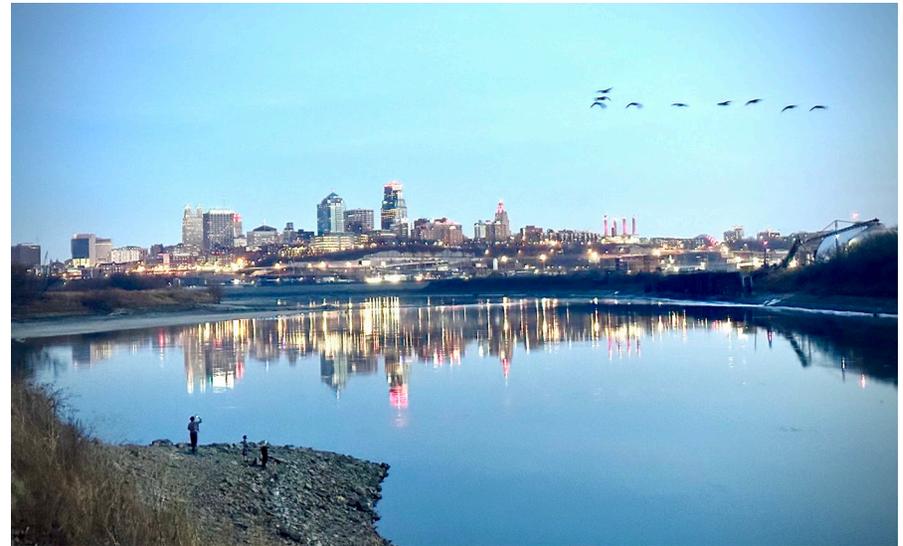
Keen Independent also examined gender equity efforts, programs and policies in Kansas City, Missouri.

Community Profile

Key demographic characteristics for Kansas City, Missouri are listed below.

- Population: 510,704.⁵³
- Employment rate: 65 percent.⁵⁴
- Educational attainment (bachelor’s degree or higher): 37 percent.⁵⁵
- Median household income: \$65,256.⁵⁶
- CEDAW resolution: Adopted in 2014.⁵⁷

A-5. Kansas City, MO skyline from Kaw Point



Source: Wikimedia Commons.

⁵³ U.S. Census Bureau 2023 QuickFacts. Kansas City, Missouri. Retrieved on November 27, 2024, from <https://data.census.gov/all?q=Kansas%20City,%20Missouri>.

⁵⁴ U.S. Census Bureau 2023 ACS 1-Year Estimates. Retrieved on November 27, 2024, from https://data.census.gov/profile/Kansas_City_city,_Missouri?g=160XX00US2938000.

⁵⁵ U.S. Census Bureau 2023 QuickFacts. Kansas City, Missouri. Retrieved on November 27, 2024, from <https://data.census.gov/all?q=Kansas%20City>.

⁵⁶ U.S. Census Bureau 2023 QuickFacts. Kansas City, Missouri. Retrieved on November 27, 2024, from <https://www.census.gov/quickfacts/fact/table/kansascitycitymissouri/NES010221>.

⁵⁷ United Nations Association of the United States of America (2021). Cities for CEDAW Promoting Women’s Equality in Your Community Guidelines and Toolkit. Retrieved on November 27, 2024, from <https://unausa.org/wp-content/uploads/2021/06/UNAWomenCEDAWToolkit.pdf?emci=05d81494-9cbc-eb11-a7ad-501ac57b8fa7&emdi=4a713dd8-70c5-eb11-a7ad-501ac57b8fa7&ceid=2749364#:~:text=for%20further%20research,-,The%20Convention%20on%20the%20Elimination%20of%20All%20Forms%20of%20Discrimination,and%20women%20around%20the%20world>.

A. Comparative Analysis — Kansas City, Missouri

Citywide Equity Initiatives

Keen Independent examined the City’s gender analysis efforts with a focus on equity oversight and initiatives.

Gender Equity Task Force. Initiatives are led by the Gender Equity Task Force (GETF), a subcommittee of the Kansas City Human Rights Commission (KCHRC). The GETF operates with budget, staffing and regulatory support from the Civil Rights and Equal Rights (CREO) Commission and connections to the Missouri Human Rights Commission.

In 2021, Mayor Quinton Lucas appointed a chair of the GETF and this chair is still in place.⁵⁸ The GETF meets monthly and is currently in the process of amending Chapter 38 of the Municipal Code. The proposed amendment would ensure the City’s accountability regarding its gender equity goals.⁵⁹

Equity assessments. Several reports published in the last five years identified gender equity-related goals for Kansas City.

Women’s Equality Coalition Report to the City Council. In the fall of 2019, Women’s Equality Coalition produced a report for the City Council regarding Resolution 141045 to establish the City of Kansas City as a CEDAW city. The report includes a recommendation for the City Council to pass an Ordinance to become a CEDAW city in addition to the creation of a Women’s Commission to provide oversight for all relevant matters.

The report includes four major areas related to gender equity that must be addressed by the City:

- Women in decision-making roles;
- Pay equity;
- Gender in workplace policies; and
- Protection, safety and prevention of discrimination.⁶⁰

While further action was requested in the report, results showed parity in representation of women in decision-making roles (this includes City Department Heads, Assistant City Managers and City Council members).⁶¹

⁵⁸ Kansas City (n.d.). Task Force of the Human Rights Commission. Retrieved on December 2, 2024, from <https://www.kcmo.gov/city-hall/departments/human-relations/filing-a-discrimination-complaint-civil-rights-division/human-rights-commission/task-force-of-the-human-rights-commission>.

⁵⁹ Keen Independent discussion with a public entity representative on November 25, 2024.

⁶⁰ Kitchen, A., James, G., Cowles, C., & Jachowicz, P. (January 12, 2021). Report to the City Council on the Elimination of Discrimination Against Women. Retrieved on

December 2, 2024, from <https://kansascity-mo.aauw.net/files/2020/11/Report-to-the-City-Council-on-the-Elimination-of-Discrimination-Against-Woman-FINAL.pdf>.

⁶¹ Kitchen, A., James, G., Cowles, C., & Jachowicz, P. (January 12, 2021). Report to the City Council on the Elimination of Discrimination Against Women. Retrieved on December 2, 2024, from <https://kansascity-mo.aauw.net/files/2020/11/Report-to-the-City-Council-on-the-Elimination-of-Discrimination-Against-Woman-FINAL.pdf><https://kansascity-mo.aauw.net/files/2020/11/Report-to-the-City-Council-on-the-Elimination-of-Discrimination-Against-Woman-FINAL>.

A. Comparative Analysis — Kansas City, Missouri

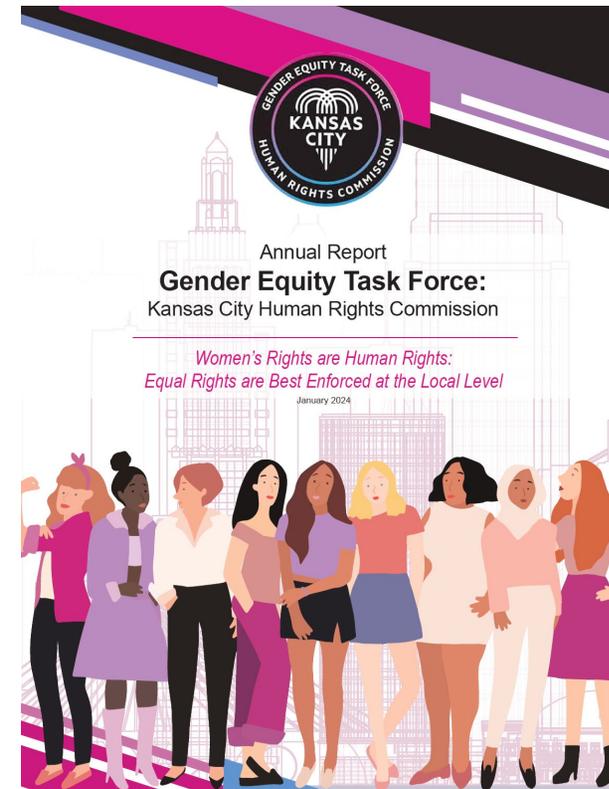
City of Kansas City Workforce Disparity Study. In 2019, Keen Independent conducted a workforce disparity study for the City of Kansas City. The study team identified disparities in construction industry workforce representation for women (and for each minority group except for Hispanic Americans).

Keen Independent found that women represented 2.5 percent of construction workers in the region compared to the 47 percent of women in the workforce without a four-year college degree, showing a substantial disparity in women in construction.⁶²

The City operates a program to promote inclusion of women and other historically underrepresented groups in construction jobs on City construction contracts.

Gender Equity Task Force (GETF) Annual Report. Since 2021, annual reports published by the GETF of the Kansas City Human Rights Commission have assessed women’s representation in City government. Over two years (2021–2023), the number of women elected officials and executive staff has decreased by approximately 17 percent.^{63,64} The most recent report found that men hold nearly two-thirds of total jobs at the City.⁶⁵

A-6. GETF Annual Report



Source: Public entity representative.

⁶² Keen Independent Research LLC (2019). City of Kansas City Workforce Disparity Study.

⁶³ Keen Independent discussion with City of Kansas City public entity representative on November 26, 2024.

⁶⁴ Annual Report GETF: Kansas City Human Rights Commission. (2024).

⁶⁵ Annual Report GETF: Kansas City Human Rights Commission. (2024).

A. Comparative Analysis — Kansas City, Missouri

American Association of University Women (AAUW). The City collaborated with AAUW to provide salary negotiation workshops under the Work Smart program to empower women to more effectively negotiate salaries and benefits.⁶⁶

LGBTQ+ Inclusive City. The City has a strong presence in the region in the LGBTQ+ community and supporting members and employees within the City. The City has enacted many resolutions and enacted an employee resource group for LGBTQ+ employees and allies in 2018.⁶⁷

⁶⁶ American Association of University Women Press Release (2018). Retrieved on November 27, 2024, from <https://www.aauw.org/resources/news/media/press-releases/aauw-womens-foundation-help-close-the-gender-pay-gap/>.

⁶⁷ City of Kansas City. (n.d.). LGBTQ+ Inclusive City. Retrieved on December 2, 2024, from <https://www.kcmo.gov/city-hall/pride>.

A. Comparative Analysis — Kansas City, Missouri

Department-Level Initiatives

Department-level initiatives within the fire and police departments highlight the City’s specialized programs that address community needs, enhance public safety and promote equitable practices.

Kansas City Fire Department (KCFD). The Kansas City Star reported on racial and gender discrimination and harassment with KCFD in December 2020 and revealed “oppressive outcomes and/or issues” with hiring, recruitment, promotion processes, racial and gender discrimination and harassment. As a response the KCFD identified six areas of action to address these issues in a multi-phase approach:

- Full investigation of events detailed in KC Star report;
- Development of zero tolerance policy for discriminatory behaviors and actions;
- Diversity recruitment and retention efforts;
- Review of all policies and procedures and compliance efforts;
- Revisions to KCFD disciplinary action procedures and procedures; and
- Creation of a Diversity, Equity and Inclusion (DEI) Office position.⁶⁸

The following steps were taken by KCFD as part of the first phase of the approach:

- Development of three DEI work groups;
- Engagement of community partners with various DEI initiatives (e.g. recruitment, community events, DEI work groups);
- Self-assessment of KCFD culture; and
- Research analysis by outside consultant yielding 15 recommendations.⁶⁹

The second phase includes the following actions:

- Identify inequitable practices and systemic outcomes across internal processes and external service delivery; and
- Develop, disseminate, implement and measure equity across all departmental processes, infrastructure and engagement.

⁶⁸ Jarvis Consulting & Training LLC (Jan. 11, 2023). Culture Assessment Report for the Kansas City Fire Department. Retrieved on November 27, 2024, from <https://www.kcmo.gov/home/showpublisheddocument/9978/638115428280170000>.

⁶⁹ City of Kansas City (n.d.). KCFD Cultural Report. Retrieved on November 27, 2024, from <https://www.kcmo.gov/city-hall/departments/fire-kcfd/kcfd-cultural-report>.

A. Comparative Analysis — Kansas City, Missouri

Kansas City Police Department (KCPD). The police department in Kansas City operates under the control of a state-appointed board rather than the City government.

One notable gender equity initiative is KCPD’s participation in the 30x30 Initiative since 2022. This initiative seeks to increase women in recruitment classes to 30 percent by 2030.

KCPD reported that in 2022, nearly 15 percent of the Department’s officers were women, which is in alignment with national rate of 15 percent. KCPD surpasses most police departments in leadership with 15 percent of command staff being made up of women (compared with national averages of 3 percent).⁷⁰

A-7. Kansas City Police Department



Source: <https://kcpolice.org/media/news-releases/kcpd-signs-on-to-new-initiative-doubling-female-officers/>.

⁷⁰ Kansas City Missouri Police Department. (June 23, 2022). New Initiative Will Double KCPD’s Female Firefighters. Officers. Retrieved on November 27, from

<https://www.kcpd.org/media/news-releases/kcpd-signs-on-to-new-initiative-doubling-female-officers/>.

A. Comparative Analysis — Kansas City, Missouri

Equity-Related Policies and Processes

Keen Independent explored some of the City of Kansas City policies and programs that may impact gender pay equity.

Equal pay and salary transparency ordinances. In 2015, State of Missouri Executive Order #15-09 was enacted to promote gender pay equity in the workplace by directing state agencies and encouraging private sector organizations to use best practice guidelines to identify and address gender wage gaps.⁷¹

In 2019, the City of Kansas City enacted a salary history ban ordinance, which prohibits employers in Kansas City, Missouri from asking about an applicant’s salary history during the hiring process.⁷²

Pregnancy and parental leave. Eligible City employees receive up to 12 weeks of paid parental leave for the birth or placement of an adopted child.⁷³

On February 1, 2024, amendments to Chapter 38 Code of Ordinances were passed under the Pregnant Workers Fairness Act (PWFA). This act supports the health and economic security of pregnant workers employed within Kansas City limits.⁷⁴

⁷¹ Secretary of State Commissions Division (Dec. 2015). Executive Order 15-09. Retrieved on November 27, 2024, from <https://static1.squarespace.com/static/545815dce4b0d75692c341a8/t/594c11cae6f2e11e9effd127/1498157515589/15-09.pdf>.

⁷² Municode (2019). City of Kansas City Sec. 38-102. Salary history. Retrieved on November 27, 2024, from https://library.municode.com/mo/kansas_city/codes/code_of_ordinances?nodeId=PTII COOR_CH38CIRI_ARTIIIDIPR_DIV1INGE_S38-102SAHI.

⁷³ Kansas City (n.d.). Benefits Summary. Retrieved on December 2, 2024, from <https://www.kcmo.gov/city-hall/departments/human-resources/benefit-summary>.

⁷⁴ Kansas City (n.d.). Pregnant Workers Fairness Act. Retrieved on November 27, 2024, from <https://www.kcmo.gov/city-hall/departments/civil-rights-and-equal-opportunity-department-creo/filing-a-discrimination-complaint-civil-rights-division/pregnant-woman-fairness-act-pwfa-1966>.

A. Comparative Analysis — Pittsburgh, Pennsylvania

Keen Independent also reviewed gender equity efforts in Pittsburgh, Pennsylvania.

Community Profile

Key demographic characteristics for Pittsburgh are listed below.

- Population: 303,255.⁷⁵
- Employment rate: 61 percent.⁷⁶
- Educational attainment (bachelor’s degree or higher): 51 percent.⁷⁷
- Median household income: \$60,187.⁷⁸
- CEDAW ordinance: December 2016.⁷⁹

A-8. View of Pittsburgh, PA



Source: Luis Mazier via Flickr.

⁷⁵ U.S. Census Bureau 2023 QuickFacts. Pittsburgh, Pennsylvania. Retrieved November 27, 2024, from <https://www.census.gov/quickfacts/pittsburghcitypennsylvania>.

⁷⁶ U.S. Census Bureau 2023 ACS 1-Year Estimates. Employment Status. Retrieved on November 27, 2024, from https://data.census.gov/profile/Pittsburgh_city,_Pennsylvania?g=160XX00US4261000.

⁷⁷ U.S. Census Bureau 2023 QuickFacts. Pittsburgh, Pennsylvania. Retrieved on November 27, 2024, from https://data.census.gov/profile/Pittsburgh_city,_Pennsylvania?g=160XX00US4261000.

⁷⁸ U.S. Census Bureau 2022 QuickFacts. Pittsburgh, Pennsylvania. Retrieved on November 27, 2024, from <https://www.census.gov/quickfacts/fact/table/pittsburghcitypennsylvania/NES010221>.

⁷⁹ City of Pittsburgh (n.d.). About the Gender Equity Commission. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/City-Government/Boards-Authorities-Commissions/List-of-Boards-Authorities-Commissions/Gender-Equity-Commission/About-the-Gender-Equity-Commission>.

A. Comparative Analysis — Pittsburgh, Pennsylvania

Citywide Equity Initiatives

The Keen Independent study team reviewed the City’s efforts to address gender inequity, including its oversight practices and various equity-related initiatives.

The Gender Equity Commission (GEC). The Gender Equity Commission (GEC) collaborates with a staff person in the Mayor’s Office of Equity to oversee analyses of existing gender inequities and recommend actions to address inequities.⁸⁰

In November 2024, the Pittsburgh City Council approved an amendment to Chapter 177C of Ordinance No. 34 that defines the Gender Equity Commission’s work and committee composition.⁸¹ The next steps for the GEC include recruiting commissioners and evaluating and revising City policies as they relate to equity.⁸²

Inequality Across Gender and Race Report. In 2019, the GEC released Pittsburgh’s Inequality Across Gender and Race report. The equity report was the first component in a gender analysis that evaluated workforce composition throughout the city.⁸³

The report recommended ten indicators for improvement that focused on health, poverty, education access, homicide rates and workforce labor. Of the ten indicators, only one focused specifically on women in the overall workforce and highlighted low rates of African American women in the workforce.⁸⁴

⁸⁰The City of Pittsburgh. (n.d.). About the Gender Equity Commission. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/City-Government/Boards-Authorities-Commissions/List-of-Boards-Authorities-Commissions/Equal-Opportunity-Review-Commission-EORC/About-the-Gender-Equity-Commission>.

⁸¹City of Pittsburgh. (2024). The City of Pittsburgh Amends the Gender Equity Commission Ordinance. Retrieved on December 2, 2024, from <https://www.pittsburghpa.gov/News-articles/Homepage/THE-CITY-OF-PITTSBURGH-AMENDS-THE-GENDER-EQUITY-COMMISSION-ORDINANCE-TO-ADVANCE-LOCAL-INTERSECTIONAL-GENDER-EQUITY-LENS>.

⁸² Keen Independent discussion with a public entity representative on November 26, 2024.

⁸³ The City of Pittsburgh’s Gender Equity Commission. (2019). Pittsburgh’s Inequality Across Gender and Race. Retrieved on November 27, 2024, from https://apps.pittsburghpa.gov/redtail/images/10645__Pittsburgh's_Inequality_Across_Gender_and_Race_JULY_2020.pdf.

⁸⁴ Howell, J., Jacobs, L.A., Branson, D., & Miller, L. (2019). Pittsburgh’s Inequality Across Gender and Race. Retrieved on November 27, 2024, from https://apps.pittsburghpa.gov/redtail/images/10645__Pittsburgh's_Inequality_Across_Gender_and_Race_JULY_2020.pdf, p. 62.

A. Comparative Analysis — Pittsburgh, Pennsylvania

Building an Equitable New Normal: Responding to the Crises of Racist Violence and COVID-19. In 2020, GEC released a second report that included 11 policy recommendations with a focus on a range of equity-related issues. Notable recommendations included the following:

- Require the collection of disaggregated data, including gender-related data, for all City department functions, programs, and initiatives;
- Build gender expertise and embed gender analyses in budgeting decisions, response plans and team expertise;
- Continue to address equity goals in hiring and promotions;
- Promote equity in hiring by requiring pay transparency and banning prior salary history questions;
- Strengthen existing paid sick leave legislation and implementation; and
- Expand access to quality, early childhood education.⁸⁵

⁸⁵ Gender Equity Commission, City of Pittsburgh (June 16, 2020). Building a New Equitable New Normal: Responding to the Crises of Racist Violence and COVID-19. Retrieved on November 27, 2024, from

https://apps.pittsburghpa.gov/redtail/images/10134_Building_an_Equitable_New_Normal_FINAL.pdf.

A. Comparative Analysis — Pittsburgh, Pennsylvania

Workforce Equity Initiative. Launched in November 2020 by the GEC, the Workforce Equity Initiative was designed to address inequities by using the following approach:

- Empowering individuals;
- Engaging employers; and
- Improving policy.⁸⁶

The three-part approach is designed as a series of steps; data and information collected through the first two steps are used to inform recommendations for changes to City government policies and practices made by the GEC.⁸⁷

In support of the goal to empower individuals, the GEC partners with the Association of American University Women (AAUW) in implementing the Work Smart program. The Work Smart program assists women in improving their salary negotiation skills through a virtual two-hour workshop.⁸⁸

A-9. Work Smart flyer



AND



***The City of Pittsburgh Gender Equity Commission
And
American Association University for Women (AAUW)
Presents a FREE Virtual Workforce Equity Workshop***

Source: <https://www.aauw.org/resources/programs/salary/work-smart/pittsburgh/>.

⁸⁶ Hansen, S., Neatrou, A. & Manuel, J. (August 2020). Envisioning Workforce Equity. Retrieved on December 2, 2024, from https://www.pittsburghpa.gov/files/assets/city/v/1/bac/documents/eorc/12188_envisioning_workforce_equity_-_companion_concept_paper_to_closing_pittsburghs_pay_gap_-_final_8-14-20.pdf, p.9.

⁸⁷ The City of Pittsburgh (2020). Workforce Equity. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/City-Government/Boards-Authorities-Commissions/List-of-Boards-Authorities-Commissions/Equal-Opportunity-Review-Commission-EORC/Workforce-Equity>.

Commissions/List-of-Boards-Authorities-Commissions/Equal-Opportunity-Review-Commission-EORC/Workforce-Equity.

⁸⁸The City of Pittsburgh (2020). Workforce Equity. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/City-Government/Boards-Authorities-Commissions/List-of-Boards-Authorities-Commissions/Equal-Opportunity-Review-Commission-EORC/Workforce-Equity>.

A. Comparative Analysis — Pittsburgh, Pennsylvania

Department-Level Initiatives

Initiatives within the fire and police departments illustrate the City's commitment to gender equity

Pittsburgh Bureau of Police (PBP). PBP has used a variety of recruitment efforts to build a pipeline of diverse candidates to enhance representation within the department. Examples include the following:

- **Citizen's Police Academy.** Twice a year, PBP hosts an event for citizens to get acquainted with the roles, training and responsibilities of the Bureau.⁸⁹
- **Student Police Academy (SPA).** The academy offers high school students a chance to learn about the roles and responsibilities of the PBP.⁹⁰
- **Cops and Kids Camp.** The Camp is a free weeklong summer camp hosted by the Pittsburgh Bureau of Police and Duquesne University. It offers City youth, ages eight to 12, a unique opportunity to promote education, character development and leadership.⁹¹

A-10. Pittsburgh Cops and Kids Camp



Source: <https://www.pittsburghpa.gov/Safety/Police/About-Police/Cops-Kids-Summer-Camp-Program>.

⁸⁹ City of Pittsburgh (n.d.). Student and Citizen's Police Academy. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/Safety/Public-Safety/Violence-Prevention/Student-and-Citizens-Police-Academy>.

⁹⁰ The City of Pittsburgh (n.d.). Student and Citizen's Police Academy. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/Safety/Public-Safety/Violence-Prevention/Student-and-Citizens-Police-Academy>.

⁹¹ The City of Pittsburgh (n.d.) Cops and Kids Summer Camp Program. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/Safety/Police/About-Police/Cops-Kids-Summer-Camp-Program>.

A. Comparative Analysis — Pittsburgh, Pennsylvania

Department of Public Safety, Bureau of Fire (PBF). In 2023 the City’s Department of Public Safety, Bureau of Fire (PBF) conducted an audit to assess diversity within the Bureau of Fire and assess the condition of its facilities. In 2022, the City’s Bureau of Fire’s percentage of female firefighters was less than 1 percent, which is lower than the national average of 5 percent.

The report had 23 recommendations. Several impact equity and inclusion, such as:

- Track the number of applicants and their demographics during the application process;
- Extend the City’s paid parental leave policy to all firefighters; and
- Develop conceptual design plans for each firehouse in relation to female accommodations.⁹²

To engage more female cadets, the PBF started a free camp in 2022 for girls ages 14–18 to learn about fitness and nutrition, emergency medical care, fire science, leadership skills and self-confidence.⁹³

A-11. Girls Fire Camp invitation



Source: <https://www.pittsburghpa.gov/Safety/Fire/Girls-Firefighter-Camp>.

⁹² Heisler, R. (Nov. 2023). Performance Audit: Department of Public Safety Bureau of Fire. Retrieved on November 27, 2024, from https://www.pittsburghpa.gov/files/assets/city/v/1/controller/documents/performance-audits/23382_2023_fire_audit_pittsburgh.pdf.

⁹³ The City of Pittsburgh. (2024). Girls Firefighter Camp. Retrieved on November 27, 2024, from <https://www.pittsburghpa.gov/Safety/Fire/Girls-Firefighter-Camp>.

A. Comparative Analysis — Pittsburgh, Pennsylvania

Equity-Related Policies and Processes

Keen Independent explored various policies and programs that could impact gender pay equity at the City.

Equal pay and salary transparency ordinances. The Pennsylvania Equal Pay Law, 43 P.S. §336 (EPL), prohibits employers from paying employees’ wages at a rate less than the opposite sex for equal work on jobs which require the same skill, effort and responsibility and in the same working conditions.⁹⁴ In 2017, the Pittsburgh City Council enacted Section 181.13: Ensuring Wage Equity, which prohibits City and agencies from asking about applicants’ prior pay.⁹⁵

Parental leave and flexible work policies. In 2021, the City of Pittsburgh enacted an ordinance, Section 189.02, that addresses the City’s leave of absence policies. This ordinance includes provisions for fully paid bereavement leaves for all City employees who experience pregnancy loss.⁹⁶

⁹⁴ Case Text (July 31, 1968). 43 PA. Stat. § 336.3. Retrieved on December 2, 2024, from <https://casetext.com/statute/pennsylvania-statutes/statutes-unconsolidated/title-43-ps-labor/chapter-8-wages/equal-pay-law/section-3363-wage-rates>.

⁹⁵ City of Pittsburgh. (Jan. 2017). Title One: Administrative, Article I: Personnel, Chapter 181: General Provisions, by adding Section 181.13. Retrieved on November 27, 2024, from [https://pittsburgh.legistar.com/LegislationDetail.aspx?ID=2931161&GUID=E45D1721-](https://pittsburgh.legistar.com/LegislationDetail.aspx?ID=2931161&GUID=E45D1721-68E5-4BEC-9989-59C275B74AA7&Options=ID%7cText%7c&Search=salary+history&FullText=1)

[68E5-4BEC-9989-59C275B74AA7&Options=ID%7cText%7c&Search=salary+history&FullText=1](https://pittsburgh.legistar.com/LegislationDetail.aspx?ID=2931161&GUID=E45D1721-68E5-4BEC-9989-59C275B74AA7&Options=ID%7cText%7c&Search=salary+history&FullText=1).

⁹⁶ City of Pittsburgh. (Sept. 2021). Title One Administrative: Article XI Human Resources, Chapter 189 Leave of Absence, Section 189.02. Retrieved on November 27, 2024, from <https://pittsburgh.legistar.com/LegislationDetail.aspx?ID=5120273&GUID=75A4A550-016B-4125-A078-F5E809A143EB&FullText=1.1>.

A. Comparative Analysis — Summary

The history and accomplishments of gender equity efforts at the three case study cities are instructive to the City of Toledo. Commonalities among each of the three cities include the following:

- City elected officials play a pivotal role in advancing gender equity initiatives.
- Regular reporting on workforce data is important for driving systemic change through informed decision-making.
- Partnerships with local organizations can be instrumental in guiding equity initiatives where internal capacity is not yet in place.
- Equity initiatives can be unique to types of city departments. For example, police and fire departments have demonstrated specialized efforts to increase representation of women, in part due to the extreme disparities in employment of women in public safety jobs.
- Adoption of CEDAW principles can provide a foundational framework that helps guide a city in grounding its efforts toward achieving gender equity.

APPENDIX B. Policy and Procedure Review

The City of Toledo provided more than 2,000 pages of policy, procedure and program documents for Keen Independent Research study team to review and assess through a gender equity lens. The document categories reviewed for this appendix include:

- Discrimination, violence and retaliation in workplace policies;
- Employment policies; and
- Insurance, medical and related leave policies.

The sections that follow are organized by the above categories (see titles at the top of each page). Each section summarizes the documents provided and information received.

B-1. View of Toledo skyline.



Source: Wikimedia Commons.

B. Policy and Procedure Review — Introduction

The City of Toledo’s workforce consists of approximately 2,500 employees, and approximately 95 percent of City employees are represented by the following bargaining units:

- American Federation of State, County and Municipal Employees (AFSCME) Local 3411;
- AFSCME Local 7 Main Unit;
- AFSCME Local 2058 Main;
- Toledo Firefighters, Local 92;
- International Brotherhood of Teamsters Local 20;
- Toledo Fire Chiefs’ Association (TFCA);
- Toledo Police Command Officers’ Association (TPCOA);
- Toledo Police Patrolman’s Association (TPPA), Local 10; and
- United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) Local 12.

This appendix contains a review of the following City of Toledo administrative policy documents:

- Reaffirmation of Equal Employment Opportunity Policy (effective 2013);
- Policy Against Discrimination and Harassment (effective 1995, revised 2010, 2015, September 2022, October 2022);
- Workplace Violence Prevention Policy (effective 1999, revised 2010, 2014, March 2020, April 2020, 2023);
- Policy in Support of Employee Victims of Domestic Violence and Abuse (effective October 2007, revised November 2007, 2011);
- The Americans with Disabilities Act (ADA) (effective 1995, revised 2014, 2023);
- ADA Grievance Policy and Procedures (effective 1984, revised 2017, 2023);
- Education and Training (effective 1997, revised 2011);
- Alternative Work Schedule (effective 2022);
- Continuation of Healthcare Coverage (effective 2009, revised 2023);
- FMLA Policy Under City, State and Federal laws (effective June 1998, revised 2014, 2023);
- Medical Examinations (effective 1983, revised 2017);
- Paid Leave Donation Program (effective 2022);
- Parental Leave (effective 2022); and
- Vacation Time (effective 1986, revised 2011).

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

The policies presented in this section establish the City’s commitment to preventing discrimination, violence and retaliation in the workplace and provide an outline of procedures for violations of these policies.

Reaffirmation of Equal Employment Opportunity (EEO) Policy

This policy aims to support the idea that all employees and job applicants are treated fairly and without discrimination based on characteristics such as gender, race, age, religion, national origin or ability. It establishes guidelines for hiring, promotions, compensation and workplace conduct to promote a fair and inclusive environment.⁹⁷

Procedural steps. The EEO Policy’s procedural steps include the following:

- The City’s Administration Department evaluates workforce data for underutilization of minorities, women and individuals with disabilities, ensuring equal consideration is given to these groups in hiring and promotions.
- The Mayor appoints an Affirmative Action/Contract Compliance Director to oversee the policy and plan, supported by Affirmative Action Specialists.
- An Equal Opportunity Representative, an elected or voluntary employee, is also designated to support compliance.⁹⁸

⁹⁷ City of Toledo, Administrative Policies and Procedures, AP 017.

⁹⁸ City of Toledo, Administrative Policies and Procedures, AP 017.

⁹⁹ Parker, K. and Funk, C. (2017). Gender discrimination comes in many forms for today’s working women. Pew Research Center. Retrieved on March 17, 2025, from <https://www.pewresearch.org/short-reads/2017/12/14/gender-discrimination-comes-in-many-forms-for-todays-working-women/>.

Impact on gender equity. In general, women face disproportionately higher rates of discrimination in the workplace compared to men, making EEO policies essential for reducing biases and systemic barriers that hinder gender equality.⁹⁹ By ensuring transparent and equitable practices in hiring, promotions and pay, this policy creates a foundation for closing gender-based wage gaps and promoting gender equity in the workplace.¹⁰⁰

EEO policies also recognize the role of intersectional discrimination, where gender, race, ethnicity, disability and other aspects of identity overlap, creating compounded disadvantages for women from marginalized groups. This intersectional approach aims to support the idea that equity efforts are comprehensive, addressing the unique challenges faced by women of color, LGBTQ+ individuals and those with disabilities, further supporting a fair and inclusive workplace.¹⁰¹

The City’s procedure strengthens gender equity by embedding affirmative action goals into annual objectives, monitored quarterly and reviewed during the Mayor’s accountability and budget process. It evaluates whether women, minorities and individuals with disabilities are underrepresented in hiring and promotion practices. Dedicated roles, including an Affirmative Action/Contract Compliance Director, specialists and an employee representative, support focused implementation and compliance. Employee involvement through

¹⁰⁰ U.S. Equal Employment Opportunity Commission. (2014). Women in the American workforce. Retrieved on March 17, 2025, from <https://www.eeoc.gov/special-report/women-american-workforce>.

¹⁰¹ Coleman, A., et al. (2021). In Pursuit of pay equity: Examining barriers to equal pay, Intersectional Discrimination Theory, and recent pay equity initiatives. Retrieved on January 17, 2025, from <https://www.eeoc.gov/pursuit-pay-equity-examining-barriers-equal-pay-intersectional-discrimination-theory-and-recent-pay>.

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

elected or volunteer representatives adds accountability, fostering workplace culture committed to equity and progress.¹⁰²

Policy Against Discrimination and Harassment

This policy affirms the City's commitment to a workplace free of discrimination and harassment. The document provides definitions and examples of various forms of discrimination, including sexual harassment. The policy also outlines the complaint procedure through which violations of the policy should be reported and addressed.¹⁰³

Reporting procedure. Should an employee experience or observe any violation of this policy by another employee, customer or third party they are promptly to report the incident to the Department of Diversity, Equity and Inclusion (DEI), any member of Human Resources or their immediate supervisor.¹⁰⁴ Reporting of an incident should occur as soon as possible, preferably within 15 days and failure of prompt reporting may result in closure of the incident without investigation. An employee does not need to first complain to the person who offended the policy.

Employee complaints are kept confidential to the extent possible, as determined by the City. While the initial complaint may be made verbally, the City may request a written statement to facilitate the investigation. All employees are expected to cooperate fully during the investigation. Any supervisor who becomes aware of an employee concern regarding discrimination, harassment or retaliation must immediately contact Department of DEI.¹⁰⁵

DEI will investigate any claims of policy violations. The duration of the investigation will vary depending on circumstances and is at the discretion of the Director of DEI, or their designee, as determined by the Office of the Mayor. If an employee is not satisfied with how their complaint or the investigation is handled, they must bring their concerns to the attention of the Director of DEI or the Director of Human Resources. An accused employee may be placed on Paid Administrative Leave during the DEI investigation of an alleged policy violation, following consultation with the Department of HR, the Department of Law and the Office of the Mayor.

In all cases, both the employee filing the complaint and the accused employee(s) will be notified when an investigation has concluded. Following the investigation the following will occur:

- The report will be sent to the Department of Law and the Office of the Mayor for review.
- If a violation is found, the Director of DEI will recommend appropriate disciplinary action, which could include termination.
- If the investigation is inconclusive or determines no violation of the policy occurred, but potentially problematic conduct is identified, the Director of DEI will recommend appropriate actions.

¹⁰² City of Toledo, Administrative Policies and Procedures, AP 071.

¹⁰³ City of Toledo, Administrative Policies and Procedures, AP 071.

¹⁰⁴ Ibid., Section III.

¹⁰⁵ Ibid.

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

Procedure for maintaining confidentiality of reports follows applicable Ohio law. Information obtained during an investigation may be disclosed to comply with a subpoena, public records request or other legally required disclosures.¹⁰⁶

Responsibilities are divided among three groups to ensure effective administration of this policy, with the following duties assigned as follows:

- Department of DEI: Implementing procedures, including resolving allegations and related misconduct. In addition, DEI is responsible for:
 - Disseminating and posting the policy City-wide;
 - Providing ongoing anti-discrimination and harassment training; and
 - Monitoring personnel actions to ensure appropriate remedies for any policy violations.

- Directors, Division Heads and/or Supervisors: Preventing and prohibiting discrimination, harassment and retaliation in the workplace, harassment or retaliation in the work environment. This includes
 - Reviewing the reporting procedures of this policy with their staff; and
 - Taking effective and appropriate action to address complaints, which may include disciplinary measures and referrals to Employee Assistance programs following the completion of an investigation.
- All City employees: Everyone is subject to this policy and is responsible for taking measures to prevent prohibited conduct.¹⁰⁷

¹⁰⁶ Ibid., Section VI.

¹⁰⁷ Ibid., Section VII.

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

Impact on gender equity. This policy supports employees by promoting a safe and equitable work environment, which is one where employees can perform their professional responsibilities, access fair wages, pursue career growth in a workplace free of bias and unfair treatment.^{108,109}

By fostering an inclusive and equitable work environment, policies like the City’s Policy Against Discrimination and Harassment help to eliminate systemic barriers that disproportionately impact women and other marginalized groups in achieving pay equity.¹¹⁰

While the policy outlines that employees may raise concerns with the Director of DEI or the Director of Human Resources if they are dissatisfied with how a complaint or investigation was handled, it does not currently include a formal appeals process, which might enhance transparency, build trust and provide employees with a path for further review without resorting to litigation.

Although the policy primarily addresses harassment and discrimination, it also states that retaliation will be handled through the same procedures. However, retaliation is not currently defined within the policy. To ensure clarity and consistency, a clear definition should be added. This definition should also be incorporated into all related trainings and employee handbooks, if it has not already been included, to promote a shared understanding of all forms of prohibited conduct.

¹⁰⁸ Institute for Women’s Policy Research, Time’s Up Foundation (July 2021). Paying Today and Tomorrow. Retrieved on March 17, 2025, from https://iwpr.org/wp-content/uploads/2021/07/Paying-Today-and-Tomorrow_Charting-the-Financial-Costs-of-Workplace-Sexual-Harassment_FINAL.pdf.

¹⁰⁹ National Partnership for Women & Families (March 2023). Sexual Harassment and the Gender Gap. Retrieved March 17, 2025, from <https://nationalpartnership.org/wp-content/uploads/2023/02/sexual-harassment-and-the-gender-wage-gap.pdf>.

¹¹⁰ Salas-Betsch, I. (2024). Ending discrimination and harassment at work. Retrieved on March 17, 2025, from <https://www.americanprogress.org/article/playbook-for-the-advancement-of-women-in-the-economy/ending-discrimination-and-harassment-at-work/>.

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

Workplace Violence Prevention Policy

This policy defines workplace violence, bullying, threats, intimidation, stalking, property damage and storage of a firearm in a privately owned vehicle. The policy outlines the reporting mechanisms, disciplinary actions and non-retaliation rights of those that bring forward a good faith complaint.¹¹¹

Reporting procedure. Employees must report instances of violence they have experienced or witnessed to their supervisor within 10 business days of the incident. If the supervisor is involved, the report should be made to their manager, Commissioner or Department Head. The incident must be documented in writing and an investigation will be conducted within 30 days. The investigator will assess the severity of the incident and document the findings in the report.¹¹²

Impact on gender equity. This policy helps foster a safe and supportive work environment where all employees, particularly women who may face higher risks of violence, can perform their roles without fear of violence.¹¹³ By prioritizing safety and well-being, this policy reduces absenteeism and turnover caused by workplace violence, enabling employees to maintain stable career progression and equitable pay.¹¹⁴

¹¹¹ City of Toledo, Administrative Policies and Procedures, AP 051.

¹¹² City of Toledo, Administrative Policies and Procedures, AP 051, Section IV.

¹¹³ U.S. Bureau of Labor Statistics. (October 2024). Factsheets: Injuries, Illnesses and Fatalities. Retrieved on March 17, 2025, from <https://www.bls.gov/iif/factsheets/workplace-violence-2021-2022.htm>.

¹¹⁴ Salas-Betsch, I. (March 2024) Ending Discrimination and Harassment at Work. Retrieved April 16, 2025, from <https://www.americanprogress.org/article/playbook-for-the-advancement-of-women-in-the-economy/ending-discrimination-and-harassment-at-work/>.

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

Policy in Support of Employee Victims of Domestic Violence and Abuse

This policy supports employees that are victims of violence and abuse with no connection to the workplace. The policy defines domestic abuse for the purpose of the policy as well as protocols for employee support. Alternatives for discipline due to domestic violence and abuse are outlined.¹¹⁵

Procedural steps. When a supervisor becomes aware that an employee is in an abusive relationship, they will provide the employee with information about the City’s Domestic Violence Resources Team and other available support. The supervisor will review the situation with their assigned Employee Relations Specialist to determine the next steps and consult the City’s Law Department. If the employee seeks a protective order, an attorney will be assigned to assist.

The City may support the employee by facilitating a worksite transfer, approval of time off (including medical leave, personal leave or vacation time) and ensuring they can attend court proceedings.¹¹⁶

¹¹⁵ City of Toledo, Administrative Policies and Procedures, AP 019.

¹¹⁶ City of Toledo, Administrative Policies and Procedures, AP 019, Section III.

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

Impact on gender equity. By providing resources such as education and protection for employees affected by domestic violence and abuse, this policy can assist with safety and helping employees maintain stable employment and income.¹¹⁷ This policy empowers affected individuals, often disproportionately comprised of women, to remain active in the workforce and achieve pay parity by reducing the risk of job loss or career setbacks due to personal safety concerns.¹¹⁸

This policy could indirectly benefit career progression, particularly for women, who are more likely to experience domestic violence¹¹⁹ and may face stigma¹²⁰ or perceived reduced opportunities for advancement due to certain accommodations.¹²¹ Lower-wage employees, who are statistically more likely to be women, may disproportionately experience less access to leave if they lack sufficient accrued time off.¹²² Women of color, employees with disabilities, and other employees with intersecting marginalized identities may also face greater barriers to accessing support, further exacerbating workplace inequities.¹²³

¹¹⁷ Miceli, K. (October 2023) 4 Types of Employment Laws That Can Help Domestic Violence Survivors at Work. Retrieved April 16, 2025, from <https://blog.dol.gov/2023/10/05/4-types-of-employment-laws-that-can-help-domestic-violence-survivors-at-work>.

¹¹⁸ The National Domestic Violence Hotline (n.d.). Empowering Domestic Violence Survivors in the Workplace. Retrieved April 16, 2025, from <https://www.thehotline.org/resources/empowering-domestic-violence-survivors-in-the-workplace/>.

¹¹⁹ Leemis, R.W., et al., (2022). The National Intimate Partner and Sexual Violence Survey: 2016/2017 Report on Intimate Partner Violence. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention. Retrieved on March 17, 2025, from https://www.cdc.gov/nisvs/documentation/NISVSReportonIPV_2022.pdf.

¹²⁰ Overstreet, N. M. and Quinn, D. M. (2013). The Intimate Partner Violence Stigmatization Model and barriers to help-seeking. *Basic and Applied Social Psychology*,

35(1), 109–122. Retrieved on March 17, 2025, from <https://pmc.ncbi.nlm.nih.gov/articles/PMC3601798/>.

¹²¹ Hess, C. and Del Rosario, A. (2020). Dreams deferred: A survey on the impact of intimate partner violence on survivor’s education, careers and economic security. Institute for Women’s Policy Research. Retrieved on March 17, 2025, from https://iwpr.org/wp-content/uploads/2020/09/C475_IWPR-Report-Dreams-Deferred.pdf.

¹²² WorkRise. (2023). Who is the low-wage workforce? Retrieved on March 17, 2025, from <https://www.workrisenetwork.org/working-knowledge/who-low-wage-workforce>.

¹²³ Hulley, J, et al. (2023). Intimate partner violence and barriers to help-seeking among Black, Asian, minority ethnic and immigrant women: A qualitative metasynthesis of global research. *Trauma, violence & abuse*,24(2), 1001–1015. Retrieved on March 17, 2025, from <https://pmc.ncbi.nlm.nih.gov/articles/PMC10012394/#bibr32-15248380211050590>.

B. Policy and Procedure Review — Discrimination, violence and retaliation in workplace policies

Americans with Disabilities Act (ADA) and ADA Amendments of 2008 (ADAAA)

While primarily focused on disability rights, the Americans with Disabilities Act (ADA) seeks equity by promoting accessibility and inclusivity through its more comprehensive definition of disability. By ensuring that women with disabilities have equal access to programs, services and activities, these policies support intersectionality and help create an environment that values diversity and equity across multiple dimensions. The policy outlines responsible departments and enforcement.¹²⁴ Like the ADA policy, the ADA Grievance Policy aids the City in meeting ADA requirements by outlining the instructions and procedures for filing an ADA grievance complaint with the City.¹²⁵

Procedural steps. The ADA procedure requires complaints to be submitted in writing within 60 calendar days of the alleged violation. A City Representative will meet with the employee within 15 calendar days of receiving the complaint and will provide a written response, including options for resolution, within 30 calendar days for the meeting. If the employee is unsatisfied with the response, they may appeal to the Director of Diversity, Equity and Inclusion (DEI) within 15 calendar days. The Director of DEI will then meet with the employee within 15 calendar days and issue a final written resolution within 30 calendar days of the meeting.¹²⁶

Impact on gender equity. Although this policy is designed to address accessibility and disability rights, it reinforces equity principles that benefit all employees. An effective ADA Grievance procedure promotes equity by ensuring employees can address rights violations transparently and fairly. It also provides a way to challenge practices that contribute to disparities, particularly when disability intersects with gender. From an intersectional perspective, the process supports employees with overlapping marginalized identities, such as gender, race and disability, by addressing compounded inequities.¹²⁷ By resolving complaints promptly, the procedure might foster a more inclusive and equitable workplace.

The 60-day timeline provides employees with an opportunity to file a grievance, provided they are aware of their rights and do not fear retaliation, lack of support or other barriers. Employees with disabilities may also face additional challenges in accessing information or support in the timeframe, particularly if there are gaps in communication or accessibility.¹²⁸

¹²⁴ City of Toledo, Administrative Policies and Procedures, AP 048.

¹²⁵ City of Toledo, Administrative Policies and Procedures, AP 031.

¹²⁶ City of Toledo, Administrative Policies and Procedures, AP 048, Section II.

¹²⁷ Shaw, L. et al. (2012) 'Intersectionality and Disability Harassment: The Interactive Effects of Disability, Race, Age and Gender', *Rehabilitation Counseling Bulletin*, 55(1), pp. 82-91. Retrieved April 16, 2025, from

https://www.researchgate.net/publication/258031528_Intersectionality_and_Disability_Harassment_The_Interactive_Effects_of_Disability_Race_Age_and_Gender.

¹²⁸ Mertens, D.M. (2014) 'Gender equity for people with disabilities,' in Handbook for Achieving Gender Equity Through Education (2nd ed.) Retrieved April 16, 2025, from https://www.researchgate.net/profile/Donna-Mertens-2/publication/315543296_Gender_equity_for_people_with_disabilities/links/593ea8700f7e9bf167c0abfb/Gender-equity-for-people-with-disabilities.pdf.

B. Policy and Procedure Review — Employment policies

The policies summarized in the following pages are related to employee and workplace policies that govern their employment.

Education and Training

This policy offers training opportunities to support employees in developing skills directly related to their current role or in areas that may enhance their professional growth. Education and training programs are typically two weeks or less and are distinct from tuition reimbursement programs. The policy specifies a funding limit of up to \$1,000 and provides guidelines for accessing these funds. Each employee may attend up to five education or training programs per year, with funding dependent on City of Toledo Code 3130.¹²⁹

Procedural steps. Upon the completion of a training or educational program, a certificate of completion or attendance must be obtained by the employee and submitted to the Department Director or Division Commissioner along with a short report on how the training will enhance the employee’s ability to perform their job. Exceptions to the policy may be made by writing to the Chief Operating Officer/Safety Director.¹³⁰

Impact on gender equity. This policy provides access to skill development opportunities, thereby enabling all employees, particularly women who may face barriers to professional advancement, to enhance their qualifications and competitiveness in the workforce. The policy could help close gender gaps in career progression and earnings potential by supporting and promoting continuous learning for employees who may not otherwise have equitable access to educational opportunities.¹³¹

¹²⁹ City of Toledo, Administrative Policies and Procedures, AP 054.

¹³⁰ City of Toledo, Administrative Policies and Procedures, AP 054, Section III.

¹³¹ Lufkin, M.E. et al. (2007) ‘Gender Equity in Career and Technical Education’, (2nd ed.) in Handbook for Achieving Gender Equity Through Education. New York: Routledge.

B. Policy and Procedure Review — Employment policies

Alternative Work Schedule

This policy aims to help employees balance work, family and personal responsibilities by providing flexible work arrangements. It is available on a case-by-case basis, depending on the suitability of the employee's role and departmental conditions. The policy outlines eligibility criteria, available Alternative Work Schedule (AWS) options, exclusions and the procedures for requesting and implementing such arrangements.¹³² The policy outlines the three available AWS formats offered through the City:

- Flexible work schedules: Employees work eight hours per day with flexible start and end times. While most employees work between 7:00 am and 6:00 pm, some may begin earlier or later and work into the evening to accommodate personal needs or preferences.
- Compressed workweeks: A full-time employee completes the equivalent of a full week's work in fewer than five days, or for those on a biweekly pay schedule, in fewer than ten workdays.

- Telecommuting: Employees may work from home or another location while staying connected by computer or phone. Telecommuting is defined as working more than half of the scheduled workday from a remote location. Telecommuting is limited to:
 - 20 days per calendar year for employees who live or work outside the City of Toledo;
 - 50 days per calendar year for employees whose home and remote work location are both within the City of Toledo; and
 - These limits include required remote workdays, such as during snow emergencies or illness quarantine.¹³³

This policy does not apply to any sworn or civilian employees within the Toledo Police Department or Toledo Fire and Rescue Department. A Department Director may request that his or her department be excluded from AWS by submitting a "Justification for Department/Division Exclusion Form."¹³⁴

¹³² City of Toledo, Administrative Policies and Procedures, AP 067.

¹³³ Ibid., Section II.

¹³⁴ Ibid.

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To be eligible for AWS, the employee must have:

- Completed their probationary period;
- A satisfactory attendance record determined by their Department Director;
- Met all performance expectations in his or her current role and perform in a timely manner, as determined by the employee’s immediate supervisor or Division Head; and
- Work and responsibilities that are conducive to an AWS arrangement.

For telecommuting, additional requirements include:

- A remote location outside of the City of Toledo must be within a 100-mile radius of the employee’s on-site work location;
- The telecommute location must have sufficient internet and communication access;
- Remote days selected must be scheduled and approved by the employee’s immediate supervisor and a record must be kept of days approved; and
- Employees must disclose the presence of dependents in the telecommute location.

Regarding presence of dependents in the telecommute environment, the policy also states that employees should not be engaging in dependent care activities while performing their official duties. There is acknowledgement that “brief interruption may occur when a dependent is present in the home, telecommuters must keep interruptions to a minimum to avoid disruptions in work accomplishment.”¹³⁵ If dependent care becomes a disruption of work accomplishment, employees are to notify their supervisors and request approval for leave while performing dependent care responsibilities. Failure to comply could result in suspension or even termination of an employee’s telecommute agreement.

¹³⁵ City of Toledo, Administrative Policies and Procedures, AP 067, Section III.

B. Policy and Procedure Review — Employment policies

Procedural steps. The City’s current policy covers eligibility requirements, the request process, decision-making guidelines, exclusions and revocation procedures. Employees must complete a request form and return it to their division or department head. Generally, requests will be approved or denied within 20 working days of submission. Absent extenuating circumstances, employees may request no more than two changes to their Alternative Work Schedule (AWS) in a calendar year. If approved for an AWS, employees are expected to adhere to the scheduled work in a consistent manner.¹³⁶

The policy states that the AWS should be evaluated through a six-month trial period for employees with results being evaluated to determine if AWS should continue. This allows for adjustments to be made without employees making long-term plans. The policy suggests that as part of the evaluation of the program, supervisors and division heads should work as a team to develop an AWS that maximizes success by doing the following:

- Regularly holding group discussions during staff meetings about AWS to identify problems and find solutions early on;
- Expect an adjustment period for everyone;
- Consider having a system to remind people of new schedules (e.g., posting schedules in office, creating standard out of office email messaging with availability);
- Educate employees with other’s records and file management system to be located in employee’s absence; and
- Educate group members to become familiar with each other’s workload.

The Department Director is responsible for determining if an AWS is appropriate by assessing the impact and outcome in terms of production, quality of production, absenteeism and best interest of the department, City and the employee.

All agreements are put in writing, with a six-month trial period to assess the impact and effectiveness. After successful completion of the trial period, the work arrangement is reviewed annually. Revocation of the agreement can be made by supervisors, managers and division heads with their director’s approval. A revocation must be justified with written instances of abuse in using an AWS. An employee may appeal against any revocation.

¹³⁶ Ibid.

B. Policy and Procedure Review — Employment policies

Impact on gender equity. Offering an AWS can be beneficial to women. While flexible working arrangements, such as hybrid and remote work, have become more secure since 2021, women maintain the concern that flexible work options may negatively affect their career concerns.¹³⁷ Men, in contrast, disproportionately benefit from on-site work, as they are more likely to receive mentorship, stay informed, have their accomplishments recognized and feel more connected in the workplace.¹³⁸ Women have reported that remote work options allow for greater focus and that they feel as motivated as employees who work on-site, suggesting a complex balance between flexibility and career concerns.¹³⁹

National research has shown that option to work remotely delivers benefits to most employees, with 83 percent saying their ability to work more effectively and productively is a primary benefit.¹⁴⁰ Women have faced stereotypes that suggest they are the only workers to be interested in an alternative work schedule, however both men and women report that opportunities to work remotely are the second most important benefit behind healthcare benefits.¹⁴¹ Research has also found that women who work remotely face fewer microaggressions and have a greater sense of psychological safety in the workplace.¹⁴²

More flexible work schedules and compressed work weeks have been linked to increased work productivity, job satisfaction and retention.¹⁴³ In 2024, about 15 percent of all workers in private industry and state and local government had access to flexible work schedules.¹⁴⁴ However, state and local government employees were less likely to have this benefit than private sector workers (8 percent compared to 17 percent).¹⁴⁵

¹³⁷ Field, E. et al., (2023). Women in the Workplace 2023 Report, p. 24. McKinsey & Company. Retrieved on March 17, 2025, from <https://www.mckinsey.com/featured-insights/diversity-and-inclusion/women-in-the-workplace-2023#/>.

¹³⁸ Ibid., 27.

¹³⁹ Ibid., 11.

¹⁴⁰ Ibid., 25.

¹⁴¹ Ibid., 23.

¹⁴² McKinsey & Company (2022). Women in the Workplace 2022. Retrieved on March 17, 2025, from https://wiw-report.s3.amazonaws.com/Women_in_the_Workplace_2022.pdf.

¹⁴³ Ray, T.K. and Pana-Cryan, R. (2021). Work Flexibility and Work-Related Well-Being. *International journal of environmental research and public health*,18(6), 3254. Retrieved on June 4, 2025, from <https://pmc.ncbi.nlm.nih.gov/articles/PMC8004082/>.

¹⁴⁴ U.S. Bureau of Labor Statistics (2024). Flexible work schedule and student loan repayment benefits. Retrieved on June 4, 2025, from <https://www.bls.gov/ebs/factsheets/flexible-work-schedule-and-student-loan-repayment.htm>.

¹⁴⁵ Ibid.

B. Policy and Procedure Review — Employment policies

For women, particularly those with caregiving responsibilities, flexible scheduling is a key factor in workplace participation and advancement. One in five women report that workplace flexibility has helped them stay at their organization or prevented reduction in their hours.¹⁴⁶ This type of support can be essential in advancing gender equity by enabling women to maintain their career progression. Flexible work also supports well-being and reduces burnout, which in turn benefits organizational outcomes.¹⁴⁷

While the City's policy offers alternative work schedule (AWS) options including flexible schedules, compressed workweeks and telecommuting, its structure raises equity concerns in both access and implementation. Notably, employees who reside within City limits are permitted to telecommute up to 50 days per year, while those living outside the City are limited to just 20 days. This geographic-based distinction may unintentionally disadvantage employees based on where they live, rather than on their job responsibilities or performance. Employees who commute from outside the City may face longer travel times, fewer opportunities for remote work and limited schedule flexibility.

Additionally, the policy relies heavily on supervisor discretion for approval and implementation of AWS options. Without clear and consistent standards across departments, this flexibility can lead to unequal access to AWS arrangements, even among similar employees. Employees may also lack clarity on how to request AWS or understand the criteria supervisors use to evaluate those requests, further contributing to inconsistencies.

Although the policy encourages collaboration between supervisors and division heads during the 6-month trial period, the guidance is largely informal, and lacks required mechanisms to support consistency, communication and fair oversight.

¹⁴⁶ McKinsey & Company (2022). Women in the Workplace 2022. Retrieved on March 17, 2025, from https://wiw-report.s3.amazonaws.com/Women_in_the_Workplace_2022.pdf.

¹⁴⁷ Ray, T.K. and Pana-Cryan, R. (2022). Work flexibility and worker well-being: Evidence from the United States. CDC: NIOSH Science Blog. Retied on June 4, 2025, from <https://blogs.cdc.gov/niosh-science-blog/2022/03/11/work-flexibility/>.

B. Policy and Procedure Review — Employment policies

Offboarding Process

Keen Independent reviewed the City of Toledo’s employee offboarding process, including the exit interview procedure and the accompanying exit checklist to be used by City staff.

Exit interview. The exit interview procedure is conducted by the departing employee’s division or department head. If requested, a representative from the Department of Human Resources can also facilitate the interview. The interview consists of the following:

- A fourteen-question guide that helps determine and examine the employee’s reasons for leaving;
- The employee’s experiences with appointments and promotions during their tenure;
- Their perceptions of whether their compensation reflected their skills;
- The employee’s access to learning and advancement opportunities;
- Relationships with their supervisor; and
- Other aspects of their employment experience with the City.¹⁴⁸

The interview is documented using a standardized form and is signed by both the departing employee and the division or department head.¹⁴⁹

The Keen Independent study team also reviewed the nature and breadth of the targeted questions in the exit interview guide related to perceptions of pay, career advancement and workplace support.

Exit checklist. The exit checklist is a procedural step to ensure all necessary tasks are completed when an employee leaves, including deactivating email accounts, returning company property and ensuring final pay is processed. This checklist focuses on administrative and logistical tasks related to the employee’s departure.

Impact on gender equity. The City’s exit interview process offers departing employees a chance to share feedback about their experience. While the option to complete the interview with either a supervisor or a Human Resources staff member may support comfort and candor, the process does not explicitly address issues related to equity or gender-based experiences.

The questions about compensation and advancement are broad and do not prompt employees to reflect on fairness or compare their experiences to peers. This limits the ability to uncover potential gender disparities in pay or promotion. Additionally, there are no questions that directly invite feedback on discrimination, bias or inclusion, which may disproportionately affect women and other underrepresented employees.

Without equity-focused prompts or clear communication about how feedback is used, employees may hesitate to raise sensitive concerns. As a result, the City may miss key insights that could inform improvements to workplace equity and retention.

The City can identify perceived gender-based inequities and use the feedback to make data-driven improvements, ensuring a more equitable and positive work environment for all employees.

¹⁴⁸ City of Toledo, Departing Employee Exit Interview and Checklist

¹⁴⁹ Ibid.

B. Policy and Procedure Review — Employment policies

Employee Hiring and Promotions

The study team examined City procedures related to employee hiring and retention.

Inclusive job postings. Women are encouraged to apply for positions with the City, demonstrated by the statement found on the City’s “working for us” webpage that reads, “[s]tudies show that women and people of color are less likely to apply to roles when they do not have 100% of the qualifications. If you think you’d be a great fit for the role, we want to meet you!”¹⁵⁰

The City’s website includes a statement regarding the City’s commitment to retaining a diverse workforce that reflects the community it serves.¹⁵¹ Applicants may follow the link which takes them to the Department of Diversity, Equity and Inclusion landing page to learn more about the City’s approach to increasing equity across all City functions.

Pay Equity Act. The City of Toledo’s Pay Equity Act, effective as of 2020, prohibits employers with 15 or more employees from inquiring about or using a job applicant’s salary history during the hiring process. This includes screening applicants based on prior compensation or relying on such information when determining employment offers or compensation packages. Employers must also provide the applicable pay scale to job applicants who have received conditional offers of employment, upon request. The Act aims to promote equity by ensuring that compensation decisions are based on job responsibilities and experiences rather than previous earnings.¹⁵²

The Pay Equity Act can help prevent perpetuation of historical wage gaps that disproportionately affect women, especially women of color.¹⁵³ Salary history is not an objective measure of a worker’s value and does not reflect the existing labor market conditions.¹⁵⁴ National research has found that the gender wage gap narrowed because of employers not seeking or relying on job candidate’s prior salary.¹⁵⁵ Women older than 35 saw the greatest earnings increase, especially women who were married and had children older than age five, which alludes to the existing wage penalty for caregivers.¹⁵⁶

¹⁵⁰ <https://toledo.oh.gov/working-with-us>

¹⁵¹ <https://toledo.oh.gov/employment>

¹⁵² https://codelibrary.amlegal.com/codes/toledo/latest/toledo_oh/0-0-0-159338.

¹⁵³ Advocates for Base Legal Equality (2019). Increase pay equity. Retrieved June 17, 2025, from <https://www.ablelaw.org/news-resources/posts/2019/july/increasing-pay-equity/>.

¹⁵⁴ Bleiweis, R. (2021). Why salary history bans matter to securing equal pay. Retrieved June 17, 2025, from <https://www.americanprogress.org/article/salary-history-bans-matter-securing-equal-pay/#:~:text=Addressing%20the%20Gender%20Wage%20Gap,->

[At%20a%20career&text=Many%20employers%20use%20salary%20history,as%20a%20federal%20policy%20solution.](#)

¹⁵⁵ Hansen, B. and McNicholas, D. (2020). Information and the persistence of the gender wage gap: Early evidence from California’s salary history ban. National Bureau of Economic Research. Retrieved on June 17, 2025, from <https://www.nber.org/papers/w27054>.

¹⁵⁶ Correll, S.J., Berenard, S. and Paik, I. (2007). Getting a job: Is there a motherhood penalty?, *American Journal of Sociology*, 112 (5), retrieved on June 17, 2025, from <https://www.jstor.org/stable/10.1086/511799?seq=4>.

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Research has found that following the implementation of a salary history bans, workers who changed jobs say their pay increase by 5 percent more than comparable workers who changed jobs with no ban in place, the largest benefits were found for women and African Americans.¹⁵⁷

Professional development. Offering opportunities for growth and skill enhancement through professional development demonstrates the City’s commitment to investing in the growth of its employees. Professional development can positively influence employee skill enhancement, career advancement, adaptation to change, increased sense of confidence, networking opportunities and job satisfaction. The following opportunities are separate from the Education and Training Policy (AP 054) section in this report.

Tuition reimbursement. City of Toledo employees may utilize tuition reimbursement after successful completion of the probationary period. Those who are interested in tuition reimbursement must notify their department or division head by June 1 each year.¹⁵⁸ An application is then required 30 days before the start of classes. The degree or coursework must be related to the employee’s job description and duties. Funds must be available in the budget.¹⁵⁹

Employee Development Grants. Employee development grants are available to enhance staff skills through training and recertification. The City provides funding of up to \$1,500 for individual development, \$2,000 for groups of two to ten employees and \$2,500 for groups of 11 or more.¹⁶⁰ Applications are reviewed and scored by the Employee Development Grants Selection Committee. The application requires the applicant to disclose whether they have received a grant within the last two years, which may imply that preference is given to those who have not received a grant in that time period.¹⁶¹

¹⁵⁷ Bessen, J.E., Meng, C., and Denk E. (2020). Perpetuating inequality: What salary history bans reveal about wages. Retrieved on June 17, 2025, from https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3628729.

¹⁵⁸ City of Toledo, Tuition Reimbursement Program, Retrieved April 16, 2025, from <https://toledo.oh.gov/employee-resources/tuition-reimbursement-program>.

¹⁵⁹ Ibid.

¹⁶⁰ City of Toledo, Employee Development Grant, Retrieved April 16, 2025, from <https://toledo.oh.gov/employee-resources/employee-development-grants>.

¹⁶¹ Ibid.

B. Policy and Procedure Review — Employment policies

Promotion procedures. All vacancies, including promotions, adhere to a 2013 procedure, where Human Resources (HR) opens a City-wide promotion notification through the Civil Service Commission (CSC).¹⁶² The job announcement includes an open and close date and is sent to all City employees and payroll clerks, who post the position. Employees are responsible for completing and submitting their applications before the closing date and time.

After the deadline, HR reviews applications and adds qualified employees to the Civil Service Eligible list. HR then evaluates promotion priorities, and the Civil Service Secretary sends the eligible list to the Division. A selection process developed between HR and the Division follows. The eligible list remains valid for six months, per CSC rules.

The promotion process can support gender pay equity by providing a clear, transparent pathway for advancement based on qualifications and experience regardless of gender, reducing the risk of gender-based discrimination. Several current strengths of the policy include the following:

- **Transparency in posting.** Openly posting positions with clear deadlines supports employee awareness of promotion opportunities.
- **Objective qualification review.** Having HR assess applications before adding candidates to the Civil Service List suggests a structured approach to evaluating qualifications.
- **Structured selection process.** The collaboration between HR and the Division assists with promotions following a defined set of procedures rather than informal decision-making.

The current promotion procedure lacks standardized bias safeguards in the selection process, such as structured interviews, blind application reviews and diverse panels, which could improve fairness.

Additionally, there are no provisions ensuring that employees on leave remain informed about promotion opportunities or are protected from disadvantages due to their absence. While career development is not directly addressed in the policy, equitable access to mentorship and leadership training is essential for supporting fair promotion pathways.

¹⁶² Department of Human Resources (July 29, 2013). Updated procedures for filling vacancies.

B. Policy and Procedure Review — Insurance, medical and related leave policies

The following policies cover topics related to health insurance, medical examinations and leave policies.

Continuation of Healthcare Coverage

This policy provides extended healthcare coverage to an employee upon termination for any reason. An employee who terminates employment is eligible for continued healthcare coverage through the end of the month in which they leave active City service. After that time, the former employee may voluntarily elect to participate in the Federal law, Consolidated Omnibus Budget Reconciliation Act (COBRA).¹⁶³

Procedural steps. Employees on non-FMLA protected leave remain eligible for healthcare coverage if they are in a paid status, this includes vacation, sick, compensatory or paid administrative leaves. If an employee is placed on non-paid status, they may voluntarily elect to continue coverage but must pay their monthly premium. Coverage resumes immediately upon returning to work.

For employees on qualified FMLA leave, healthcare coverage continues as long as they pay their monthly premium. If payments are not made, coverage is temporarily suspended, though the employee remains on FMLA leave.

Impact on gender equity. While this policy may not directly impact the City’s internal gender equity, it contributes to broader gender equity efforts by ensuring that women retain access to essential healthcare during job transitions, reducing economic disparities and supporting workforce stability. Women are more likely to undertake caregiving responsibilities and experience biased workplace policies towards accessing healthcare.¹⁶⁴ Women transitioning between employment may experience difficulty accessing healthcare due to the change in income and social support systems, including affordable childcare and caregiving in their absence.¹⁶⁵

The policy references COBRA, which provides extended healthcare coverage for employees who lose eligibility due to qualifying events. However, COBRA operates separately from this policy and employees should be encouraged in the policy to refer to federal COBRA guidelines for election timeframes and coverage duration.

¹⁶³ City of Toledo, Administrative Policies and Procedures, AP 016.

¹⁶⁴ Jeffrey, G. (2025) Barriers to Women in Accessing Healthcare in the UK – A Review. *London School of Economics*, 3(4), Available at: <https://ppr.lse.ac.uk/articles/10.31389/lseppr.122> (Accessed April 29, 2025).

¹⁶⁵ Ibid.

B. Policy and Procedure Review — Insurance, medical and related leave policies

FMLA Policy Under City, State and Federal Laws

This policy outlines the City’s compliance with the Federal Family and Medical Leave Act (FMLA), including areas where City practices align with or expand upon federal requirements. It defines employee eligibility for family leave and details the rights and responsibilities of both the employee and the City.¹⁶⁶

Procedural steps. To initiate the FMLA process, employees must submit a completed Request for FMLA form to the payroll clerk. Payroll will verify the employee’s eligibility based on their time with the organization and forward the details to Human Resources. HR will review the submitted documentation, including the Certification, to determine eligibility.

If everything is in order, the employee’s supervisor will oversee compliance, ensuring the employee’s leave is in line with the authorized time. If an employee faces an unexpected medical emergency, they can request FMLA by notifying their supervisor, who will then facilitate the necessary paperwork.

Impact on gender equity. This policy supports employees in taking unpaid leave for caregiving or medical needs without fear of job loss, reducing gender-based disparities in workplace retention and career advancement. By normalizing caregiving responsibilities across genders, FMLA helps to dismantle stereotypes that disproportionately hinder women’s earning potential and career progression.¹⁶⁷

National research shows that gender and class differences create barriers to FMLA use, particularly for Black and Hispanic employees, limiting its effectiveness in preventing economic hardship compared to its impact on white employees.¹⁶⁸ Research shows that 18 percent of employees do not take leave because they were unaware it was available, 35 percent were concerned about being treated different at work for needing leave and 66 percent said they couldn’t afford to take unpaid leave.¹⁶⁹ Keen Independent understands that the City has not analyzed FMLA usage data by race/ethnicity, gender and wage level to identify gaps and adjust outreach efforts if needed. This might be an analysis the City might perform in the future.

¹⁶⁶ City of Toledo, Administrative Policies and Procedures, AP 052.

¹⁶⁷ Mangelsdorf, M. and Kelly, E. (2024). How the Family and Medical Leave Act helped women’s careers. Retrieved on March 17, 2025, from <https://mitsloan.mit.edu/centers-initiatives/institute-work-and-employment-research/how-family-and-medical-leave-act-helped-womens-careers>.

¹⁶⁸ Joshi, P., Baldiga, M., Earle, A., Huber, R., Osypuk, T., and Acevedo-Garcia, D. (2019). How much would family and medical leave cost workers in the US? Racial/ethnic

variation in economic hardship under unpaid and paid policies. *Community, Work & Family*, 24(5), 517–540. Retrieved on March 17, 2025, from <https://doi.org/10.1080/13668803.2019.1704398>.

¹⁶⁹ Department of Labor (ND). FMLA, 30th anniversary; Addressing barriers to workplace leave. Retrieved on June 16, 2025, from <https://www.dol.gov/sites/dolgov/files/WHD/images/FMLA/Addressing-Barriers-to-Workplace-Leave.pdf>.

B. Policy and Procedure Review — Insurance, medical and related leave policies

Medical Examinations

This policy establishes the requirements and procedures for determining which medical evaluations are required for employment with the City. The evaluations include pre-employment exams, medical assessments related to Workers' Compensation claims, exams to determine an employee's ability to continue to perform on the job duties and exams to assess readiness to return to work.¹⁷⁰

Procedural steps. Medical examinations associated with Workers' Compensation claims, the Department of Human Resources, Benefits and Training Section will schedule the examinations and notify the employee when and where to report.¹⁷¹ Pre-employment medical examinations are covered by Personnel Policy and Procedure #3. All other medical examinations require the Head of the Department, Division or Agency in which the employee works to request in writing the medical examinations through HR's Employee Relations Section.¹⁷²

If approved by the Mayor or the Mayor's designee, the request is forwarded to the Department of Human Resources. The Employee Relations Section schedules the examination(s) and notifies the Department, Division or Agency head in writing of when and where the employee shall report.¹⁷³ The employee is also notified of the type of examination they are receiving, the reason the examination is being requested and when and where they are to report for the examination.

Impact on gender equity. This policy can have a positive impact by ensuring that all employees, regardless of gender, are evaluated based on their ability to perform the essential functions of their job, rather than on assumptions related to gender or health. By providing clear and equitable criteria for job performance and return-to-work capabilities, the policy may help avoid discrimination, ensuring that women, who may be more likely to take medical leave,¹⁷⁴ are not penalized or marginalized in their career advancement.

However, the policy could negatively impact gender equity if medical examinations are applied in a way that disproportionately affects women, especially in cases involving Parental Leave or pregnancy-related health issues. Studies show that women may receive different diagnoses or treatment recommendations than men for the same symptoms, which could lead to unfair outcomes in employment decisions.¹⁷⁵ If women are subjected to biased evaluations compared to their male counterparts, it could lead to job-related barriers, delays in

¹⁷⁰ City of Toledo, Administrative Policies and Procedures, AP 026.

¹⁷¹ City of Toledo, Administrative Policies and Procedures, AP 026, Section II.

¹⁷² Ibid.

¹⁷³ Ibid.

¹⁷⁴ Denton, S. (2020). Workers' access to and use of leave from their jobs In 2017–18. Retrieved on March 17, 2025, from <https://www.bls.gov/spotlight/2020/workers-access-to-and-use-of-leave/pdf/workers-access-to-and-use-of-leave.pdf>.

¹⁷⁵ Cabral., M. and Dillendar, M. (2021). Disparities in health care and medical evaluations by gender. Retrieved on June 16, 2025, from <https://www.jstor.org/stable/pdf/27042291.pdf>.

B. Policy and Procedure Review — Insurance, medical and related leave policies

return-to-work processes or reduced opportunities for promotions, exacerbating gender-based pay disparities.¹⁷⁶

The current policy does not have a grievance process that allows employees to challenge medical evaluations, especially if they impact employment status or benefits. The City could establish a formal appeals process for employees to contest the findings of medical or psychological evaluations. This could include the right to submit additional documentation, request a second opinion or appeal to a neutral review panel.

¹⁷⁶ Cabral, M. and Dillender, M. (2023). Gender differences in medical evaluations: Evidence from randomly assigned doctors. Retrieved on March 17, 2025, from https://www.nber.org/system/files/working_papers/w29541/w29541.pdf.

B. Policy and Procedure Review — Insurance, medical and related leave policies

Paid Leave Donation Program

This policy enables employees to donate accrued sick, compensatory, vacation and discretionary holiday time to eligible Exempt Service employees in need of additional paid leave. Donations can be made to support employees experiencing a documented medical condition or illness, caring for an immediate family member with such a condition or following the birth of the employee’s own child. The policy provides detailed definitions, terms, conditions and procedures for participating in the program.¹⁷⁷

Procedural steps. To request donated paid time off, employees must be permanent, full-time staff who have exhausted all paid leave, are not receiving other disability benefits and plan to be absent for at least seven consecutive workdays due to serious medical need.¹⁷⁸ The employee submits a completed request form, along with medical certification to their payroll clerk. The request is then reviewed by the division head and forwarded to Human Resources (HR) for approval.

The employee must have exhausted all accumulated sick time and all other accrued paid time off, including discretionary holiday time, vacation time and compensatory time and not be receiving any other disability related benefit such as worker’s compensation. Subject to availability of Donated Leave Time, qualifying employees are eligible

to receive no more than 1,040 hours of paid leave donated under the Program during the entirety of their employment with the City.

If the employee exhausts the 1,040 hours he or she may submit a written request for an extension of the hours to a Paid Leave Donation Committee. The Committee is comprised of at minimum, two representatives from Management and two representatives from the Union, if applicable. The Committee may agree to extend the hours on a case-by-case basis. The final decision is based off consensus of the Committee and if consensus is not reached then the request is denied.

If additional documentation is needed, HR may request it. All information is handled confidentially, but the program may be subject to public record laws.¹⁷⁹

Impact on gender equity. This policy supports gender equity by providing employees, particularly women who often assume caregiving responsibilities, with additional paid leave during critical times, helping them maintain financial stability and job security. Women take and need more leave in comparison to men.¹⁸⁰

By allowing employees to access donated leave, the program reduces the likelihood of unpaid leave or career disruptions, which are significant contributors to the gender pay gap.¹⁸¹

¹⁷⁷ City of Toledo, Administrative Policies and Procedures, AP 064.

¹⁷⁸ City of Toledo, Administrative Policies and Procedures, AP 064, Section IV.

¹⁷⁹ Ibid.

¹⁸⁰ U.S. Bureau of Labor Statistics (2019). Access to and use of leave summary. Retrieved on March 17, 2025, from <https://www.bls.gov/news.release/leave.nr0.htm>.

¹⁸¹ Johnson, R.W., Smith, K.E. and Butrica, B. (2023). Unpaid family care continues to suppress women’s earnings. Retrieved on March 17, 2025, from <https://www.urban.org/urban-wire/unpaid-family-care-continues-suppress-womens-earnings>.

B. Policy and Procedure Review — Insurance, medical and related leave policies

Parental Leave

This policy provides employees with eight weeks of paid leave at 70 percent of their base pay for the birth, adoption of a child or stillbirth (20 weeks or after). Employees may use accrued paid leave to supplement the remaining 30 percent of their pay. All time taken under this policy will count toward the employee’s FMLA entitlement. The policy outlines eligibility, procedures and the benefits available while on leave.¹⁸²

Procedural steps. Employees must inform their supervisor of their need for parental leave and the expected duration of the leave. If the leave is foreseeable, at least 30 days’ advance notice is required; if not, employees should provide as much notice as possible.¹⁸³ A verbal request must be followed by submitting a Parental Leave Request Form.

Employees eligible for FMLA may also need to provide certifications or a Statement of Attending Physician per the City’s FMLA policy. Approved employees must submit a birth certificate, adoption certificate or other documentation as determined by Human Resources within 90 days of the birth or placement. Those using Parental Leave are not eligible to receive donated time for any portion of the eight-week leave.¹⁸⁴

Impact on gender equity. This policy aims to assist employees, particularly women who may take on primary caregiving roles, can maintain financial stability during critical life events without facing a gap in pay. By offering paid leave and allowing use of additional accrued time, this policy attempts to reduce the impact of caregiving responsibilities, supporting career continuity and equitable pay.¹⁸⁵

Research shows that paid parental leave policies can lead to 20 percent fewer women leaving the workforce in the first year after welcoming a child and up to 50 percent reduction after five years.¹⁸⁶ Women who take paid leave of 30 or more days are 54 percent more likely to receive wage increases in the year following the child’s birth in comparison to women who take no leave at all.¹⁸⁷ There is also evidence that paid leave helps women pursue and stay in high-wage careers that are

¹⁸² City of Toledo, Administrative Policies and Procedures, AP 068.

¹⁸³ City of Toledo, Administrative Policies and Procedures, AP 068, Section III.

¹⁸⁴ Ibid.

¹⁸⁵ Adema, W. et al. (2016) ‘Paid parental leave and other supports for parents with young children: The United States in international comparison’, *International Social Security Review*, 69(2), pp. 29-51. Retrieved April 16, 2025, from https://onlinelibrary.wiley.com/doi/abs/10.1111/issr.12100?casa_token=FVwhijwbukgAAAA%3AOGUIK4c-F7YGzIE1j37zaLDMEeOJ-L5LPclZZvkAu71v7uXFJhWxvYaprGesZqfXHjhw99rUVyi.

¹⁸⁶ Institute for Women’s Policy Research (2021). The impact of paid leave on women’s earnings and workforce participation. Retrieved on March 17, 2025, from <https://iwpr.org/new-study-reveals-paid-family-leave-policies-lead-to-20-fewer-women-leaving-the-workforce/>.

¹⁸⁷ Houser, L. and Vartanian, T. (2012). Pay matters: The positive economic impacts of paid Family Leave for families, businesses and the public. Retrieved on March 17, 2025, from <https://nationalpartnership.org/wp-content/uploads/2023/02/pay-matters.pdf>.

B. Policy and Procedure Review — Insurance, medical and related leave policies

typically dominated by men.^{188 189} Paid parental leave policies encourage gender equality, support workforce continuity, in addition to attracting and retaining diverse employees and helping close the gender pay gap.¹⁹⁰

The current policy clearly allows employees to supplement the 70 percent paid parental leave with accrued leave to reach full pay, but it does not address whether accrued leave can be used to extend the duration of leave. This ambiguity may lead to inconsistent application and confusion among employees and supervisors.

However, the partial pay component of the policy may create financial challenges for employees, particularly those without sufficient accrued leave to supplement the difference. This could lead to inequitable access to leave, disproportionately affecting lower-wage earners. Two-thirds of employees who received partial or no pay while on leave report financial difficulty.¹⁹¹

Paid leave reduces economic stress, boosts maternal and child health and improves family relations.¹⁹² Low-income workers have the most inflexible jobs and the least access to paid parental leave.¹⁹³ To reduce inequality, paid parental leave should include full or near full wage replacement and should last 12 weeks.^{194 195}

Additionally, extending paid leave in the event of a miscarriage (prior to the 20 weeks) to promote that employees experiencing such losses receive the necessary support.

¹⁸⁸ Gitis, B. (2021). Paid Family Leave can help close the gender pay gap. Retrieved on March 17, 2025, from <https://bipartisanpolicy.org/blog/paid-family-leave-can-help-close-the-gender-pay-gap/>.

¹⁸⁹ Hsain, A.H, et al. (2020). Paid Family Leave to strengthen the STEM workforce. Retrieved on March 17, 2025, from https://www.sciencepolicyjournal.org/uploads/5/4/3/4/5434385/hsain_etal_jspg_v17.2.pdf.

¹⁹⁰ Renz, C. (2019). Five ways parental leave can improve culture and increase diversity in organizations. *Forbes*. Retrieved on March 17, 2025, from <https://www.forbes.com/councils/forbeshumanresourcescouncil/2019/08/15/five-ways-parental-leave-can-improve-culture-and-increase-diversity-in-organizations/>.

¹⁹¹ Boesch, D. (2021). Quick facts on paid Family and Medical Leave. Retrieved on March 17, 2025, from <https://www.americanprogress.org/article/quick-facts-paid-family-medical-leave/>.

¹⁹² Rothwell, D.W. (2024). Policy brief: State paid parental leave policy: A tool to reduce inequality within and between families. *National Council on Family Relations*, 9 (1). Retrieved on June 16, 2025, from https://www.ncfr.org/system/files/2024-01/State%20Paid%20Parental%20Leave%20Brief%20January%202024_0.pdf.

¹⁹³ *Ibid.*

¹⁹⁴ *Ibid.*

¹⁹⁵ A Better Balance (2025). Best practices for paid Family Leave policies for local government employees. Retrieved on June 16, 2025, from <https://www.abetterbalance.org/resources/paid-family-leave-local-government-employees/>.

B. Policy and Procedure Review — Insurance, medical and related leave policies

Sick Leave

Sick leave is not included in the City’s Administrative Policies (AP). However, information regarding employee sick leave is outlined in the respective Collective Bargaining Agreements.

Vacation Time

This policy allows employees to use vacation time for any purpose, provided it is scheduled and approved by the relevant Department in accordance with applicable ordinances, collective bargaining agreements, City policies and divisional work rules and practices.¹⁹⁶

Procedural steps. Use of vacation time is not procedurally outlined in the Administrative Policy and Procedure 035, but states “request for vacation and records regarding vacation use are to be handled consistently with all presently effective ordinances, agreements, City policies, and divisional work.”¹⁹⁷

Impact on gender equity. This policy seeks equitable access to paid time off and strives to support that all employees, regardless of gender, have the opportunity to recharge and maintain a healthy work-life balance, which is crucial for job satisfaction and continued career progression.¹⁹⁸

National research shows that on average, male employees get 10 percent more paid time off (PTO) days than women and also take 33 percent more days off than female coworkers.¹⁹⁹ Over 40 percent caregivers think it is difficult to take PTO and 50 percent of caregivers are considering leaving their jobs in the next 12 months.²⁰⁰ Workplace culture can also play a role, where some research indicates that women feel more guilt about taking time off, fearing it may impact career progress.²⁰¹

The policy references departmental and collective bargaining agreements, which govern the majority of the workforce. Ensuring that administrative guidance complements these agreements can help support consistency, transparency and employee understanding across departments.

¹⁹⁶ City of Toledo, Administrative Policies and Procedures, AP 035.

¹⁹⁷ Ibid.

¹⁹⁸ Yunita, T, et al. (2023). Work-life balance, job satisfaction and career development of Millennials: The mediating role of affective commitment. Retrieved on March 17, 2025, from <https://www.semanticscholar.org/reader/acee5ebde6f13f8d110762d58bdb2b5cd618ecfc>.

¹⁹⁹ Sorbet (2024). Sorbet PTO Report 2024. Retrieved on June 16, 2025, from https://www.getsorbet.net/sorbet_pto_report_2024.pdf.

²⁰⁰ Ibid.

²⁰¹ Dinesh, S. and Parker, K. (2023). More than 4 in 10 U.S. workers don’t take all their paid time off. Pew Research Center. Retrieved on June 16, 2025, from <https://www.pewresearch.org/short-reads/2023/08/10/more-than-4-in-10-u-s-workers-dont-take-all-their-paid-time-off/>.

APPENDIX C. City of Toledo Employee Climate Survey

Keen Independent developed an internal survey for the City of Toledo employees to express their thoughts regarding workplace climate and impressions of pay, diversity, equity, inclusion and belonging.

Methodology

Keen Independent created a customized climate survey to obtain employee insights on workplace climate and equity that inform the recommendations in the Gender Equity Action Plan.

Distribution. The survey was electronically distributed to all City employees with an email address by the City, and flyers with a survey QR code and link for easy access were also utilized. City employees received several notifications to participate in the survey between February 2025 and March 2025.

Survey structure. The survey featured a mix of multiple choice, Likert scale and open-ended questions covering various topics related to the employees' perceptions of City's current approach to gender equity and workplace climate as well as demographic information of the respondent.

Responses. The survey was sent to all City staff (2,572 employees). There were 739 employees who participated in the internal survey, for a response rate of 29 percent. Of the 739 initiated surveys, 437 (59%) were fully completed and 302 (41%) were partially completed. We note the individual response counts ("N") to each question below the corresponding figure.

Anonymity of responses. To ensure survey respondent anonymity, Keen Independent did not collect individually identifiable information (e.g., names, email addresses or employee ID numbers). Responses were submitted via internet directly to the Keen Independent study team.

Analysis. Keen Independent computed averages and frequencies for the rating scale and demographic questions. Each survey item included an option for participants to select "I don't know/no opinion." For analyses involving scaled responses distribution (e.g., 1-7 ratings), responses marked as "I don't know/no opinion" were excluded from the figures. This allows easy comparison of results for questions using a 1 to 7 scale. However, for categorical data visualization for questions such as age or "yes/no" questions about a specific topic, these "I don't know/no opinion" responses are shown. Survey participants were able to skip any question and still proceed to the next question. Respondents who skipped a question were not included in the results for that question.

The study team also analyzed open-ended responses and synthesized emerging themes. Keen Independent provides comments representative of each theme to include in this appendix. To contextualize quotes that appear throughout this appendix, we include general demographic information (e.g., "white male employee").

Keen Independent discusses important differences in responses by gender, where possible. However, due to the subgroup size of non-binary individuals, the study team was not able to analyze potential differences in response between non-binary respondents and respondents reporting a binary gender.

C. City of Toledo Employee Climate Survey

Questions

The survey asked City of Toledo employees questions in the following categories:

- Demographics;
- Impressions of gender equity;
- Workplace culture;
- Impressions of pay equity;
- Impressions of hiring and advancement;
- Training; and
- Additional comments about workplace fairness.

This appendix is organized by each of these categories. The climate survey instrument appears at the end of the appendix.

C. City of Toledo Employee Climate Survey — Demographics

The demographic characteristics of employees who participated in the climate survey are presented in the first section.

Employment Demographics

Participants identified their respective job category, exempt versus nonexempt status and employment tenure.

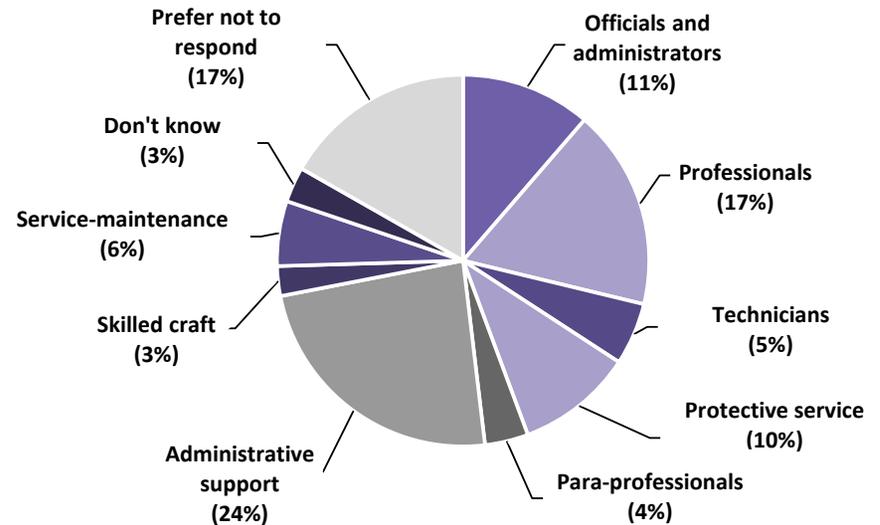
Job category. Keen Independent asked participants to identify the job category that best describes their job title and responsibilities with the City. The categories are based on the EEO-4 job categories and the portions of employees in each job category are presented to the right.

Protective service employees represents the largest group of City employees but, at 10 percent of survey respondents were only the third-largest group of respondents to the survey. Skilled craft workers and employees in the Service-Maintenance EEO-4 group may also be underrepresented.

Administrative support workers (24%) comprised the largest share of survey respondents, which is higher than expected based on representation in the City workforce. These differences in results could also be somewhat due to how people classified themselves in the survey compared to how EEO-4 groups are assigned in the City's employment data.

An additional 17 percent of respondents answering this question indicated that they would prefer not to provide their job description, and about 3 percent of respondents did not know which category to choose. Also, the share of responses from other groups of employees roughly matched what might be expected from the distribution of City workers by EEO-4 group.

C-1. EEO-4 job category of employee climate survey participants



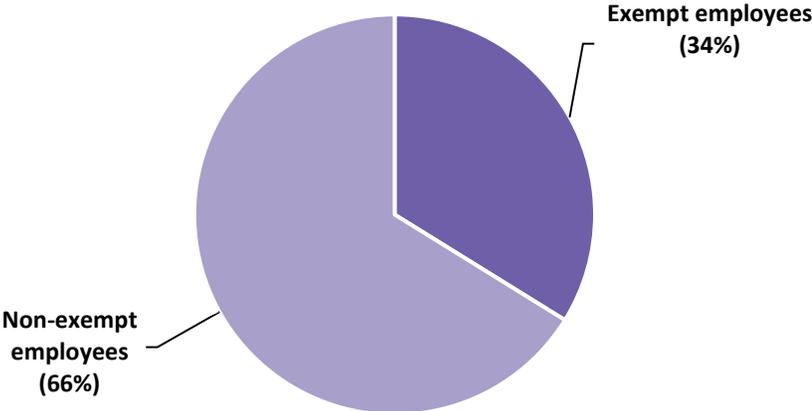
Note: N = 424.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

Exempt versus nonexempt status. Two-thirds (66%) of survey respondents indicated that they were nonexempt employees, which are employees who are subject to certain protections under the Fair Labor Standards Act (FLSA), such as being paid extra for working beyond 40 hours in a week. One-third of respondents reported being exempt employees.

C-2. Exempt or nonexempt status of employee climate survey participants

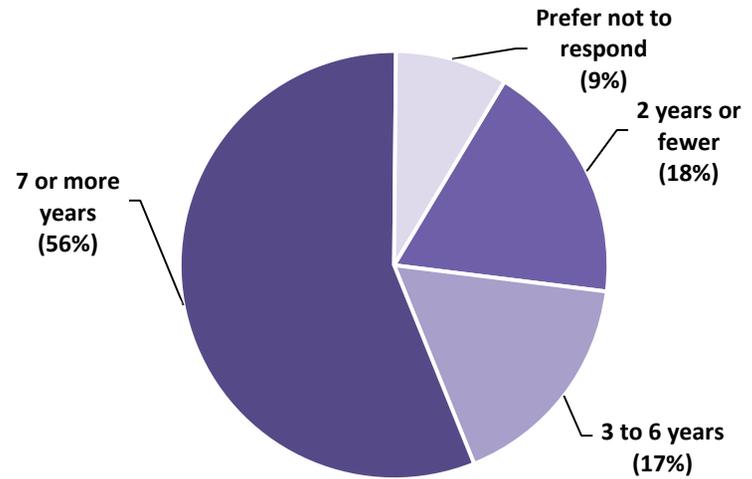


Note: N = 402.
Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

Tenure. More than one-half of respondents (56%) indicated having worked with the City for seven or more years, and roughly one in five employees (18%) reported having worked for Toledo for two years or less. Results are presented in Figure C-3 on the right.

C-3. Tenure of employee climate survey participants



Note: N = 425.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

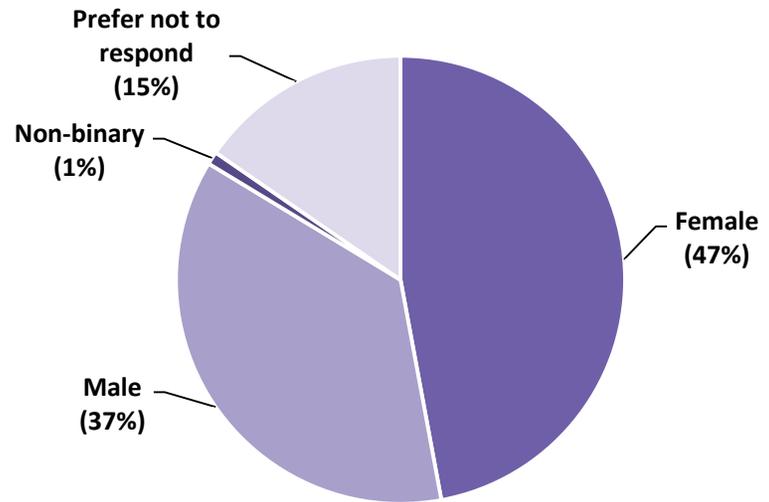
Personal Demographics

Keen Independent also captured demographic information related to participants' gender identity, age, race/ethnicity, education, disability status and family structure.

Gender identity. Just under one-half of survey respondents identified as female (47%) and about 37 percent identified as male. Just under 1 percent reported a non-binary gender identity. About 15 percent preferred not to report their gender identity. Results are presented on the right.

Although women comprise about one-quarter of City employees, women working at the City made up the largest share of survey respondents.

C-4. Gender identity of employee climate survey participants



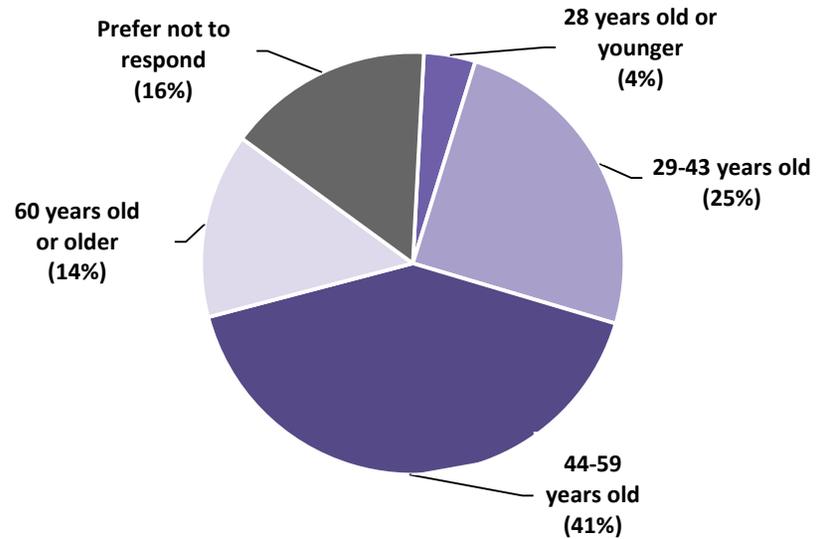
Note: N = 429.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

Age. Two-thirds of survey respondents said they were between 29 and 59 years old. About 4 percent of respondents were 28 or younger and employees 60 and older were another 14 percent of respondents. About 16 percent of survey respondents preferred not to share their age range.

C-5. Age of employee climate survey participants



Note: N = 431.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

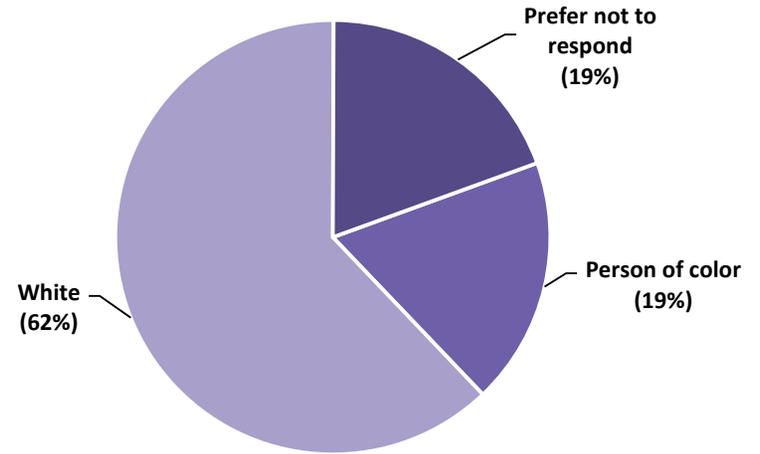
Race and ethnicity. The climate survey prompted participants to indicate their primary racial and ethnic group.

Participants were able to report their race or ethnicity as American Indian or Alaska Native; Asian American, Pacific Islander or Native Hawaiian; Black or African American; Hispanic or Latino; Middle Eastern or North African; white (non-Hispanic) or another group, in which case respondents were able to provide an open-ended response regarding their race and/or ethnicity.

About 62 percent of respondents reported being white and 19 percent reported being people of color, including two who selected the “other” option and indicated being people of color through the open-ended response option. About one in five participants (19%) chose not to share race and ethnicity information. People of color most commonly responded that they were Black or African American. Results are presented on the right.

The share of survey responses from employees of color (among those who responded to this question) is just a few percentage points less than what is found for all City employees.

C-6. Race and ethnicity of employee climate survey participants



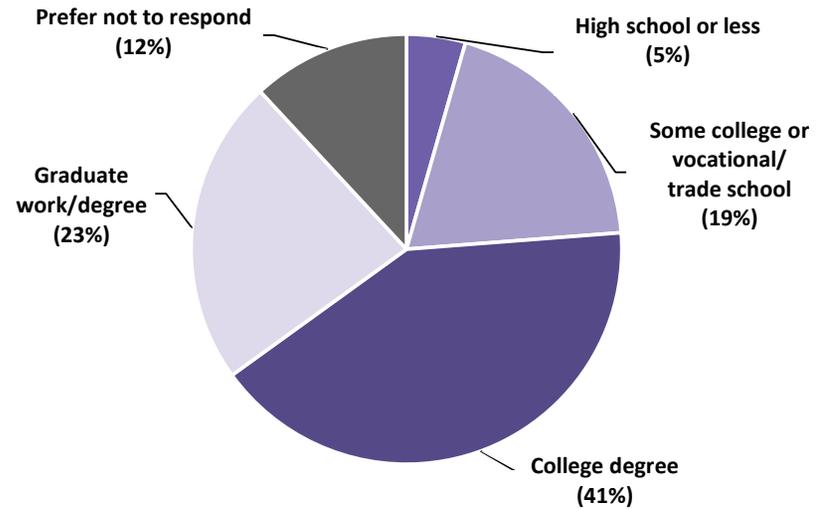
Note: N = 423.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

Education. Internal climate survey participants were also asked about their highest level of education. About 64 percent of employee survey participants indicated having a college degree or higher, and another 19 percent reported having attended some college or trade school. Results are presented on the right.

C-7. Highest level of education completed by employee climate survey participants



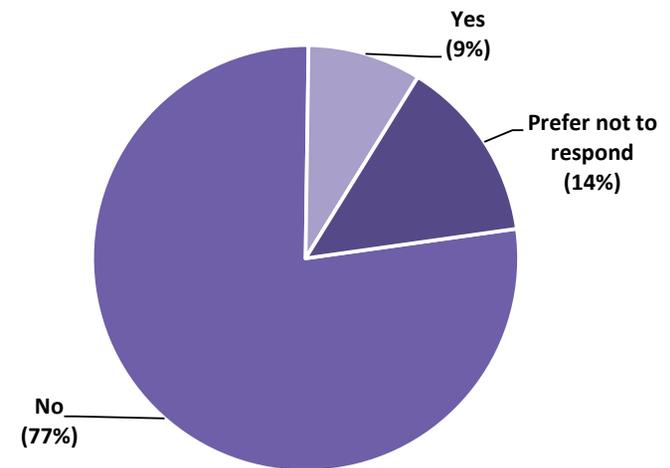
Note: N = 429.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

Disability status. About 9 percent of participants reported identifying as a person with a disability. About 77 percent of employee respondents responded that they do not identify as such, while another 14 percent of participants preferred not to respond. Results are shown on the right.

C-8. Disability status of employee climate survey participants



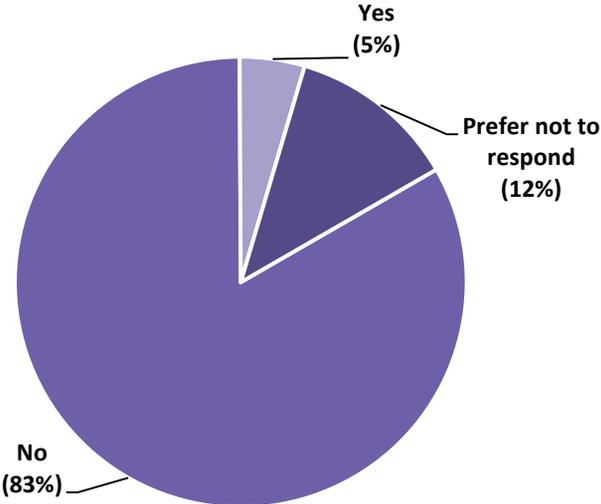
Note: N = 430.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

LGBTQIA+ status. About 5 percent of employee survey participants identified as LGBTQIA+. Figure C-9 provides these results.

C-9. Employee climate survey participants' indication of their LGBTQIA+ status

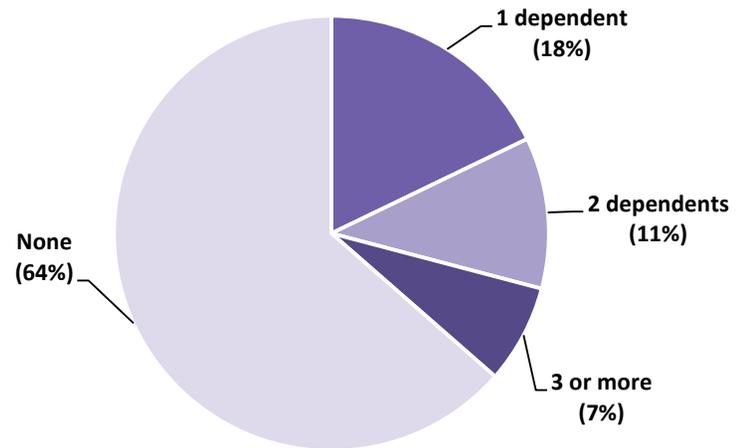


Note: N = 430.
Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Demographics

Dependents. About 64 percent of respondents in the climate survey reported having no dependents under the age of 18. Approximately 18 percent of participants indicated having one dependent under 18, and the remaining respondents (18%) reported having two, three or more dependents. See Figure C-10 on the right.

C-10. Number of dependents of employee climate survey participants



Note: N = 409.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of gender equity

Keen Independent asked climate survey participants to share their perceptions of whether there is gender discrimination within the City workplace.

Gender Discrimination

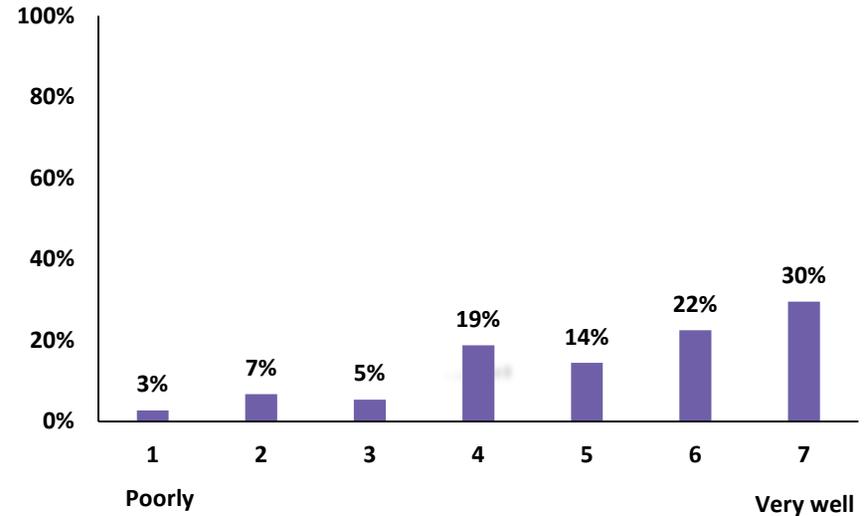
Respondents were asked to rate how effective the City was in achieving the goal of working to eliminate gender discrimination in the workplace on a scale from 1 to 7, where 1 is “poorly” and 7 is “very well.”

Among the 298 employees who responded, the majority agreed or strongly agreed (selected a rating of 5 or higher) that the City was doing very well in efforts in eliminating gender discrimination in the workplace, while 15 percent of employees reported the City was poorly achieving the goal (chose a rating of 3 or lower).

- Male participants were more likely to respond give positive scores for this item. Among male respondents, 77 percent indicate that the City is doing well in efforts of eliminating gender discrimination (chose a value of 5 or higher) compared to 66 percent of participants identifying as female.
- Almost one-quarter (22%) of people of color indicated that the City is not doing well at achieving the goal of working to eliminate gender discrimination in the workplace (chose a rating of 3 or lower) compared to 8 percent of employees who identified as white.

The overall distribution of responses is shown in Figure C-11 on the right.

C-11. Participants’ opinion of the City’s efforts in eliminating gender discrimination



Note: N = 298

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of gender equity

As a follow-up, survey participants were asked to provide an explanation of the rating they selected regarding how they perceived the City’s efforts of eliminating gender discrimination in the workplace.

Equal Treatment and Representation

Many employees reported that they did not witness or experience gender discrimination and perceived balanced gender representation in leadership roles and key positions.

Favoritism and Nepotism

Several respondents expressed concerns that hiring decisions were influenced by personal relationships rather than based on merit.

Examples of comments are shown on the right side of the page.

I feel both genders are given equal opportunities.

White female employee

I have not seen any gender discrimination.

African American female employee

The workforce in the area I'm exposed to is very diverse and I've seen no indication that gender is considered at all in choosing people for a role.

White male employee

Gender is not a factor. Who you are friends with is what matters here.

African American male employee

The City thrives on the buddy system. They have rigged the hiring process and typically they have already informed the person who they will hire to apply for the position.

Employee

I've seen where some employees received jobs because they are friends with staff members vs others who are good because they are male, female or African American.

African American male employee

C. City of Toledo Employee Climate Survey — Impressions of gender equity

Gender-based Stereotypes

Some employees mentioned gender biases, such as associating certain roles as “male” or “female,” as well as other types of gender discrimination.

Some also mentioned pay inequities within the City. Examples of comments made in this part of the survey are shown on the bottom right. Note that perceptions of pay equity were further explored near the end of the survey. These results are discussed in the Impressions of Pay Equity section of this appendix.

Women are treated differently and poorly.

African American female employee

Some people believe that certain roles are for men vs women. After I was recently hired by the City, I was told that I was almost passed over for the position because I would've been the only [gender] in our office.

Employee

In the departments I have worked there is always a culture where the men are "buddies" and leave women out of meetings/conversations. I have heard way too many men say that [employee X] has a "fetish with blondes" or the issue with the administration is that there are too many women. I've heard this from City Leadership.

White female employee

I have witnessed a candidate for a position that possessed extensive qualifications, including a bachelor's degree and relevant credentials. Despite her strong background, she was not selected out of 27 applicants. This decision does not appear to be based on social compatibility, as she is professional, well regarded and interacts effectively with others.

White employee

I know of two employees with the same job title and the male is earning more than the female.

African American female

It has improved over the last 10 years, but we need more pay equity for women.

White female employee

C. City of Toledo Employee Climate Survey — Impressions of gender equity

Lack of Awareness and Visibility of Initiatives

Many participants were unaware of specific efforts or policies aimed at promoting gender equity. Several noted they had no knowledge of any action the City had taken on this issue, were unsure who was leading such efforts and expressed uncertainty about whether gender equity was being addressed at all.

Reverse Discrimination

Some respondents, particularly white males, felt that diversity and inclusion efforts have led to reverse discrimination. They expressed perceptions that the City prioritizes hiring females, that males are passed over in favor of female candidates and that females receive preferential treatment in the workplace.

I have no knowledge of the work they are doing in this area.

Employee

I don't have information on what the City has done to address these issues or if they exist within our organization so I cannot say whether the goal has been achieved.

African American female employee

Not aware of anything being done or who is doing the work or who to report issues to. As usual, great communication.

Employee

I'm not sure if we're doing anything for gender discrimination. Or I am not aware of anything.

Employee

The City hires only women.

Employee

Specifically passing over males for females is also discrimination.

Employee

There is no discrimination. If anything, females are provided greater opportunity.

Employee

There is discrimination in the workplace, often favoring females. My employment was possible only after a female failed the physical portion of the pre-employment testing.

Male employee

C. City of Toledo Employee Climate Survey — Impressions of gender equity

Personal Experience

City employees were asked if they had observed or experienced any discrimination during their employment with the City.

Many respondents said they have not experienced personal discrimination or observed it in their employment with the City. However, about half of respondents said they had experienced or observed discrimination in some capacity during their tenure with the City. Participants that said they had observed or experienced discrimination cited gender-, race- and age-based discrimination or preferential treatment.

Examples of comments are shown on the right side of the page.

Men are treated differently from women. Men can say or do something and get away with it. Women can say or do the exact same thing and get disciplined for it because it is unprofessional. Like saying a swear word or slamming a door.

White female employee

I have been asked to get coffee for or clean up after men without reference to my position.

White female employee

I've seen discrimination for age, against people with different skin colors than their supervisors and against younger staff, even though that is not a protected category.

White male employee

I definitely have experienced some bias at work.

African American male employee

A prior boss would disregard what the women in the office had to contribute over a man's contribution. He would also not allow the women to advance or excel in their position.

White female employee

I have experienced discrimination firsthand.

White male employee

C. City of Toledo Employee Climate Survey — Impressions of gender equity

Direct Supervisor Role

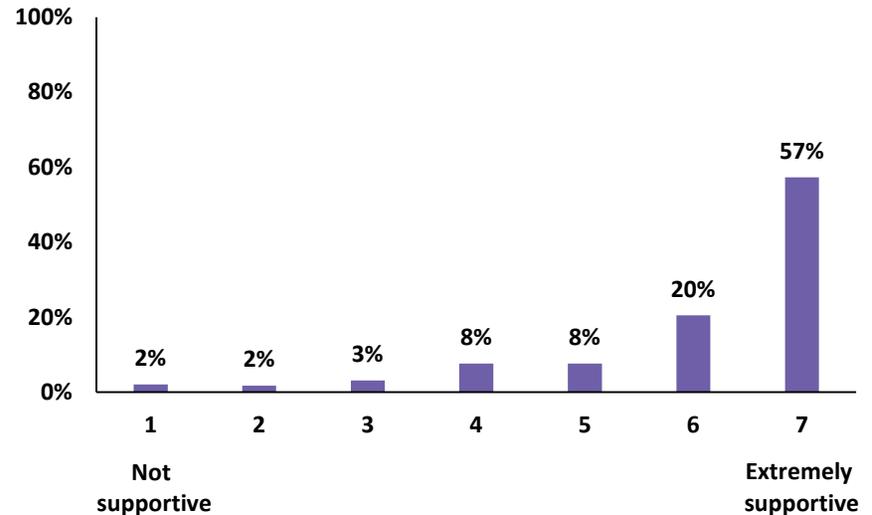
Employees were asked how supportive their direct supervisor is in the City’s goal of eliminating gender discrimination in the workplace on a scale from 1 to 7, where 1 is “not supportive at all” and 7 is “extremely supportive.”

A large portion of respondents (85%) indicated that their direct supervisor is supportive of the City’s goal of eliminating gender discrimination (selected a rating of 5 or higher). About 7 percent of survey participants indicated that their supervisor was unsupportive of this goal (chose a rating of 3 or lower). See Figure C-12 on the right.

Additionally, the study team found the following:

- White participants were more likely than participants of color to select a value of 5 or higher on this question (91% and 67%, respectively). Similarly, white participants were less likely than respondents of color to select a value of 3 or lower (5% and 17%, respectively).
- Women of color were the least likely of all groups to report perceiving their supervisors as supportive of the goal to eliminate gender discrimination (63%, compared to 85% of all respondents) and were the most likely to report that their supervisors were not supportive of the City’s goal (19%, compared to 7% of all respondents).

C-12. Participants’ ratings of how supportive their direct supervisor is in the City’s goal of eliminating gender discrimination



Note: N = 288.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of gender equity

As a follow-up open-ended question, Keen Independent asked survey respondents how, if at all, their direct supervisor could better support the goal to eliminate gender discrimination within the City workplace.

Respondent Suggestions Regarding Supervisors

Several participants reported that their direct supervisor was already doing well at supporting the elimination of gender discrimination and had no suggestions. A few participants reported that the goal could not be achieved through their supervisor because their direct supervisor contributed to the problem of gender discrimination.

Suggestions for supervisors included the following:

- Increased fairness and equity in hiring and promotion practices;
- Leadership and people-skills training; and
- Increased support from senior leaders to supervisors.

Examples of comments are shown on the right side of the page.

Create and support development opportunities, provide evaluations, and be transparent about potential opportunities.

Female employee

By choosing the best candidate for the job rather than targeting a specific demographic.

White male employee

A more proactive approach in terms of monitoring performance. I think a good performance management system allows for fair evaluation that is more objective and less susceptible to bias.

White female employee

Obtaining some training on how to be a leader.

African American female employee

Need diversity training.

Female employee

My direct Supervisor is not even qualified to be in the Supervisory position and does not have the basic skills to manage people or address issues of this nature.

White female employee

They cannot impact gender discrimination. It comes from higher up.

Employee

I have the best direct supervisors, but as it goes up the chain of supervisors I can't vouch for them.

White male employee

C. City of Toledo Employee Climate Survey — Impressions of gender equity

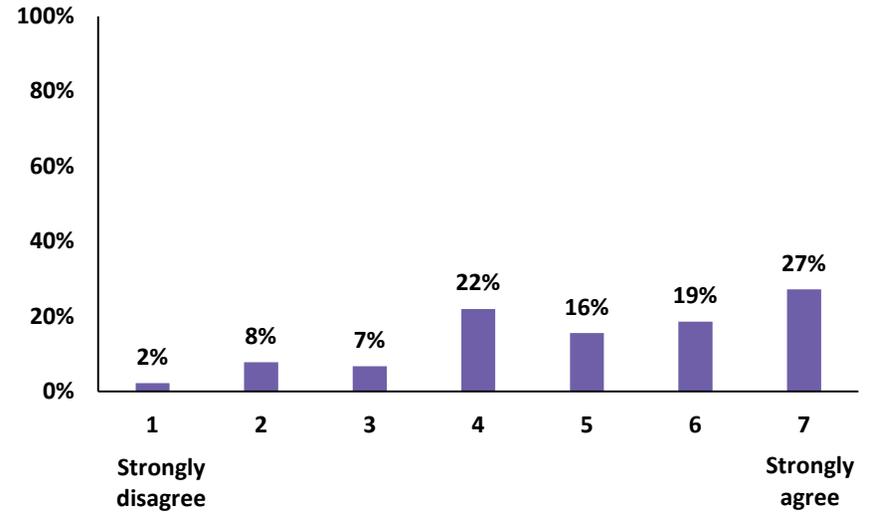
Work Policies

Survey respondents were then asked whether they agree that the City’s policies support fair employee treatment, also scored on a scale from 1 to 7, where 1 is “strongly disagree” and 7 is “strongly agree.”

Approximately 61 percent of participants agreed that City policies support fair treatment of employees (selected a rating of 5 or greater), 22 percent were neutral (selected a rating of 4) and 17 percent of respondents disagreed (selected a rating of 3 or less).

Women of color were more likely to provide lower scores on whether City policies support fair treatment (30% chose a value of 3 or less) compared with white men (11%), white women (13%) and men of color (19%).

C-13. Participants’ opinion of whether the City’s policies support fair treatment of employees



Note: N = 360.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of gender equity

As a follow-up open-ended question, survey respondents were asked to provide an explanation for their response related to whether the City's policies support fair employee treatment.

Agree or strongly agree that City policies support fair employee treatment. Respondents who selected 5 or above provided comments such as those on the right.

The policies show how the City is potentially attempting to provide fair treatment.

African American female employee

We have a number of policies that support the fair treatment of employees. One example is our very extensive hiring/promotional process. This helps to ensure the fair treatment of employees.

White female employee

Our policies are in place and support addressing any type of discrimination. The issue is with enforcing the policy itself.

Hispanic American male employee

The policies are made to help support fair treatment of employees.

White male employee

C. City of Toledo Employee Climate Survey — Impressions of gender equity

Disagree or strongly disagree that City policies support fair employee treatment. Respondents who selected a rating of 3 or below made comments including those to the right.

The written policy says one thing, but the implementation is lacking. There seems to be a large disparity by department as to how the employees are treated. Even within my own department, that's split into two parts, one half is clearly favored over the other and that reflects in everything from schedule flexibility to pay.

White female employee

Perhaps if the policies were enforced the same on everyone, sure they support fair treatment then. In reality, that is not what happens.

White female employee

Some policies are ridiculous, such as the discretionary holiday policy. It can only be scheduled in advance. What makes it discretionary if I have a flat tire and come in 1 hour late? That time cannot be used. Therefore, I have to use sick time.

Female employee

There is room for improvement. Even though workplace policies are established, a Director can send an email and change what's allowed on some policies Therefore, departments have different rules under the same policy.

African American female employee

I see many different people not being treated fairly or favoritism. People complain about when they have surgery how the City does not do a good job with vacation and short-term disability. Many people have told me they were not treated well when they had a procedure done that they had to be off work for.

Employee

C. City of Toledo Employee Climate Survey — Workplace culture

City employees were asked to provide their perceptions of safety in the City of Toledo workplace.

Workplace Safety

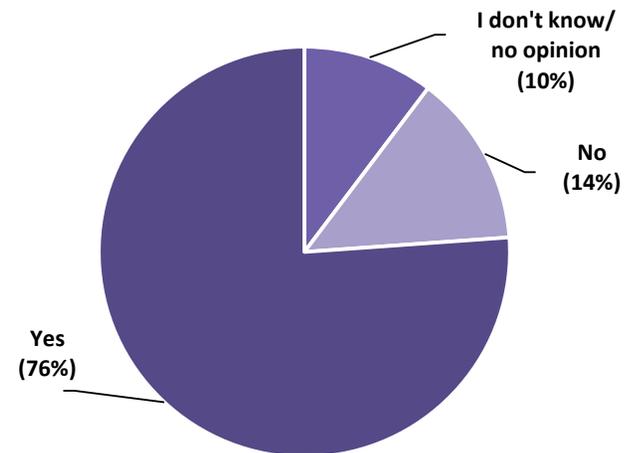
Keen Independent asked climate survey participants to indicate if they feel safe in the workplace.

Three quarters of participants said “yes” and about 14 percent reported that they do not feel safe. About 10 percent indicated they did not know or had no opinion. Figure C-14 on the right shows these results.

Further analysis explored whether there were any differences in response between different demographic groups.

- About 20 percent of employees who identified as people of color said they did not feel safe in the workplace, much higher than the 12 percent of white employees reporting not feeling safe.
- Notably, there were no material differences found between male and female responses to this question.

C-14. Participants’ responses to whether they feel safe in the workplace



Note: N = 486.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

As a follow-up question, City employees were asked to provide an explanation for why they responded the way they did about feeling safe in the workplace.

Reported feeling safe in the workplace. Respondents who selected “yes” they feel safe in the workplace provided the following comments. Several comments indicated that they did not feel safe in the workplace even though they responded “yes” they feel safe in the workplace.

Good safety practices in the workplace.

White female employee

I do now. There was a time that I did not, and I reported an incident to a higher up and it was addressed.

White female employee

For the most part, I feel safe. But this is from our group training and being accountable for ourselves.

White male employee

I work in a secure area. I attended the training last fall in which we were offered good information about keeping safe should there be a safety breach.

White female employee

Some employees reported that they generally felt safe but mentioned specific situations where they did not always feel safe. Examples of comments are provided below.

I feel safe with most, but if I had to be alone in the office with certain male coworkers, I would not feel safe.

White female employee

Generally speaking, I feel very safe. I do sometimes worry about possible violent retaliation after having to fire an employee.

White female employee

Aside from unsecure parking, I feel safe.

Hispanic American male employee

I have not personally had an issue, but sometimes it is concerning walking from the parking lot to the building if there are a lot of people loitering.

African American female employee

I feel safe enough, but I continue to think the security/access into this building is lackluster on its very best day despite recent improvements. The employee entrance security seems pretty sleepy at all times.

White male employee

I feel safe, but there have been times when I have felt very bullied and when I brought it to my supervisor's attention I was 'counseled' for it. This has left a very 'untrustworthy' feeling in me.

White male employee

C. City of Toledo Employee Climate Survey — Workplace culture

Reported they did not feel safe in the workplace. Respondents who indicated that they do not feel safe in the workplace provided the following comments.

I was assaulted.

Female employee

Physically I feel safe, but I should not feel like I am going to be yelled at or treated like a scolded child when I am working because I am afraid of how the bosses will interpret things.

African American female employee

I feel physically safe but not emotionally or mentally safe.

African American female employee

My coworker threatened someone and was not let go.

White female employee

Sexual misconduct still happens. It is scary to report it.

White female employee

Bullying in the City is horrible, obvious and well known and promoted.

Employee

Safety needs to be a higher priority. It is not taken seriously. Management needs to grasp safety better and implement stronger standards and procedures.

Male employee

Speaking up results in more punishment.

White female employee

I am very concerned about retaliation.

White female employee

There is not support for people reporting or actual investigations being done when there is a claim made. Without legal counsel, claims are treated as invalid with no accountability in management.

Employee

We need more guards, and body cams.

Employee

We are not provided with proper supplies for working in different weather conditions, and the parking lots are not tended to after snow and ice. Constantly slipping in parking lots. Repairs to shop areas not taken care of.

White male employee

The condition of my facility in general presents a lot of safety issues.

White female employee

We had a safety in the workplace seminar, but no additional trainings or items brought up in the meeting were ever implemented. As usual, it's all talk and no changes.

Employee

BLAST training showed me I would die if there was an active shooter.

White female employee

C. City of Toledo Employee Climate Survey — Workplace culture

Reported they did not know or had no opinion. Some of the respondents who indicated in their scoring they had no opinion or did not know about safety in the workplace provided further comments that suggested that they did not feel fully safe at the City. Examples of their comments are provided here.

I don't feel comfortable saying.

Employee

I do see some harassment and bullying and have experienced it even though it may be subtle it is evident, to answer this question, I feel somewhat safe.

Employee

I feel safer now with the new security measures. But that only goes so far. Someone can still slip in the back door with a weapon. And employees go through no screening.

African American male employee

Safety here is situational.

White male employee

The City has not done anything directly to make me feel safe.

African American female employee

Safe from being discriminated against? Absolutely not!

White male employee

I generally feel safe, but I have been warned, by multiple co-workers, of prior aggressive bad behavior from a still employed supervisor.

White female employee

We had an employee threaten another employee and the City did not discipline or terminate the employee. That is concerning to department safety.

White female employee

I feel my voice is not heard which means I don't feel safe.

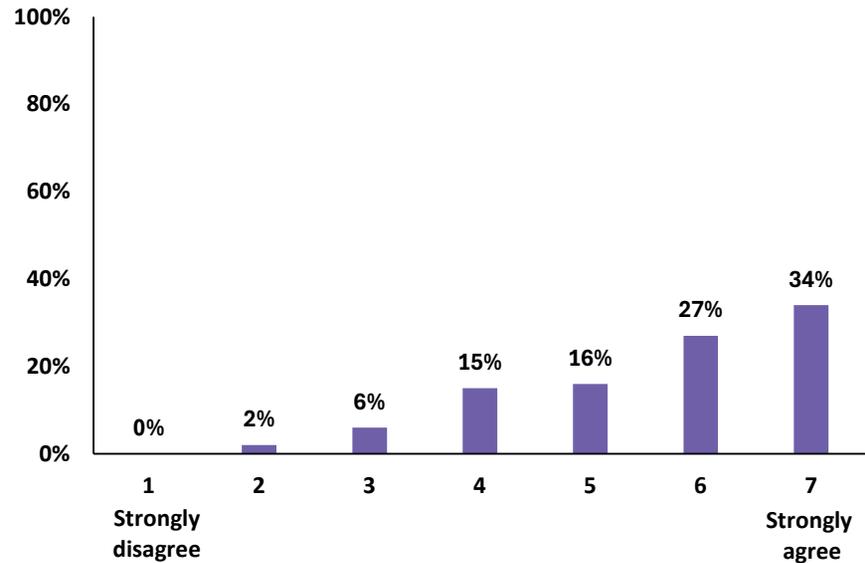
African American female employee

C. City of Toledo Employee Climate Survey — Workplace culture

Interactions with Peers

City employees were asked if they were satisfied with their interactions with their peers at work on a scale from 1 to 7, where 1 is “strongly disagree” and 7 is “strongly agree.” No participants responded with a 1 response of “strongly disagree,” and more than 90 percent of respondents were either neutral or reported being at least somewhat satisfied with their interactions with work peers. Further analysis did not find any gender differences to responses in this question. The response distribution is presented in Figure C-15 on the right.

C-15. Participants’ ratings of whether they are satisfied with their peer interactions at work



Note: N = 431.

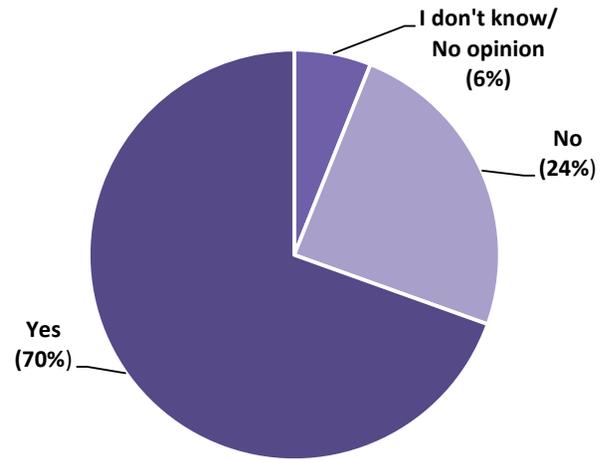
Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

Workplace Complaints

Employees were also asked if they knew where to go within the City to file a workplace complaint if they needed to do so. About 70 percent of survey participants responded “yes,” and about one-quarter of respondents indicated that they do not know where to file a complaint. Figure C-16 on the right presents these results.

C-16. Whether participants reported knowing where to go within the City to file a workplace complaint



Note: N = 479.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

As a follow up question, employees were asked if they would be comfortable filing a complaint or a union grievance related to the following concerns:

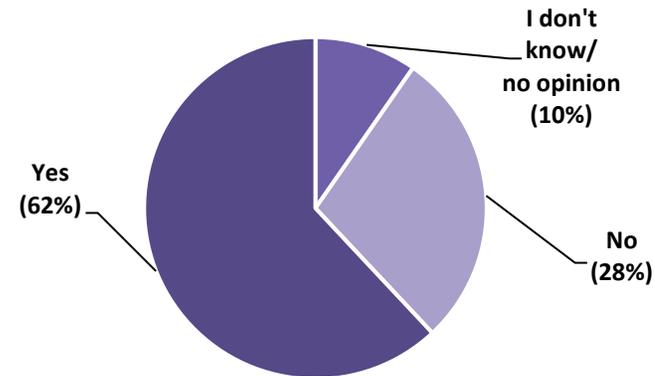
- Bullying;
- Sexual harassment;
- Discrimination;
- Workplace violence; and
- Safety.

Results are discussed below and on the next two pages.

Bullying. When asked whether they would be comfortable reporting a bullying incident at work, about 62 percent of respondents indicated that they would feel comfortable doing this, while around 28 percent responded that they would not feel comfortable reporting bullying. Figure C-17 on the right shows these results. A slightly higher percentage of women respondents reported that they would not be comfortable reporting bullying (34% of women, compared to 28% of all respondents).

Sexual harassment. When asked whether they would feel comfortable filing a workplace grievance regarding sexual harassment, about one in five reported they would not feel comfortable (21%) while roughly one in 10 were not sure or had no opinion (10%). Another 69 percent of survey respondents indicated that they would feel comfortable filing such a complaint. Among female employees, about 24 percent reported not feeling comfortable reporting sexual harassment, which was slightly higher than males (20%). Figure C-18 in the righthand column presents these results.

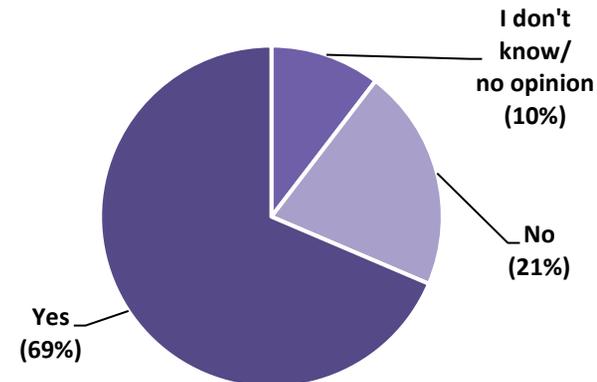
C-17. Whether participants would be comfortable filing a complaint or union grievance related to bullying



Note: N = 476.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C-18. Whether participants would be comfortable filing a complaint or union grievance related to sexual harassment



Note: N = 471.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

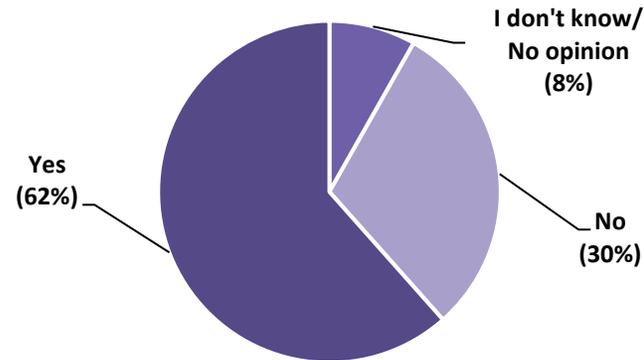
C. City of Toledo Employee Climate Survey — Workplace culture

Discrimination. Similar to the responses about bullying, only 62 percent of survey participants reported that they would feel comfortable making a discrimination complaint, while 30 percent would not be comfortable. Another 8 percent of respondents were uncertain or did not have an opinion (see Figure C-19 on the right). Female employees were less likely to feel comfortable reporting discrimination (33% responding “no” to this question) compared to male employees (23% responding “no”).

Workplace violence. A somewhat higher percentage of respondents indicated that they would be comfortable submitting a complaint or grievance regarding workplace violence than felt comfortable filing a grievance about discrimination, bullying or sexual harassment. Three-quarters of respondents reported that they would be comfortable reporting such a complaint, while roughly one in five indicated they would not be comfortable doing so. Employees of color were less likely to feel comfortable reporting workplace violence (26%) compared to white employees (16%).

Figure C-20 presents these results.

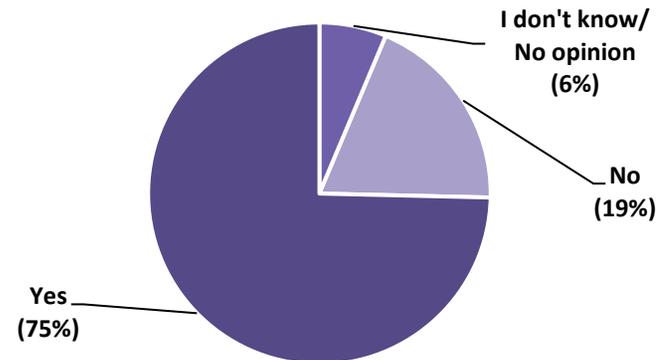
C-19. Whether participants would be comfortable filing a complaint or union grievance related to discrimination



Note: N = 476.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C-20. Whether participants would be comfortable filing a complaint or union grievance related to workplace violence



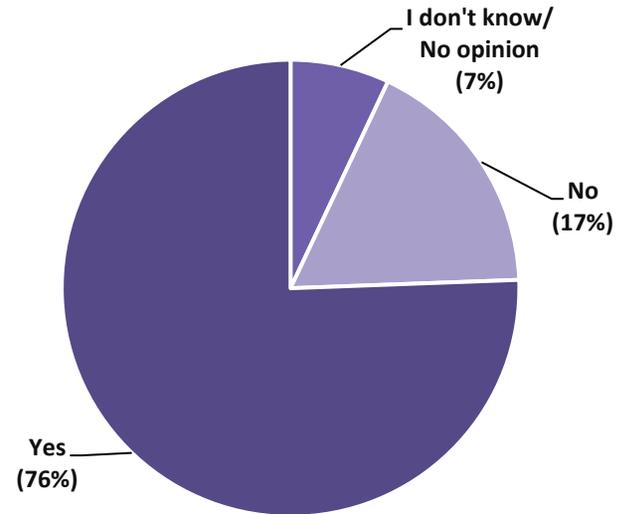
Note: N = 473.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

Safety. Similar to complaints about workplace violence, three quarters of respondents reported that they would be comfortable filing a complaint or grievance about workplace safety. Another 17 percent responded that they would not feel comfortable filing a complaint if they had an issue with workplace safety. Employees of color were less likely to feel comfortable reporting workplace safety (23%) compared to white employees (14%). These results are presented in Figure C-21 on the right.

C-21. Whether participants would be comfortable filing a complaint or union grievance related to safety



Note: N = 471.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

Differences in responses for male employees of color. Further analysis found that male employees of color reported feeling less comfortable than other groups if it came to filing most of the studied types of complaints or grievances. (Note that the subgroup for male employees of color for each of these questions was relatively small: the n values are reported below.)

- **Bullying.** About 36 percent of male respondents of color (N=22) reported not being comfortable reporting bullying, compared to 28 percent of all respondents.
- **Sexual harassment.** Among male employees of color (N=22), 32 percent indicated that they would not be comfortable filing a sexual harassment complaint or union grievance, compared to 21 percent of all survey respondents.
- **Discrimination.** About 39 percent of male employees of color answering the question about discrimination (N=23) would not be comfortable reporting this, compared to 30 percent of all respondents.
- **Workplace violence.** Approximately 35 percent of survey participants who were male employees of color (N=23) were not comfortable reporting filing a complaint regarding workplace violence, compared to 19 percent of all respondents.
- **Safety.** Among male employees of color answering this question (N=23), about 35 percent reported not being comfortable filing a safety-related grievance, compared to 17 percent of all respondents.

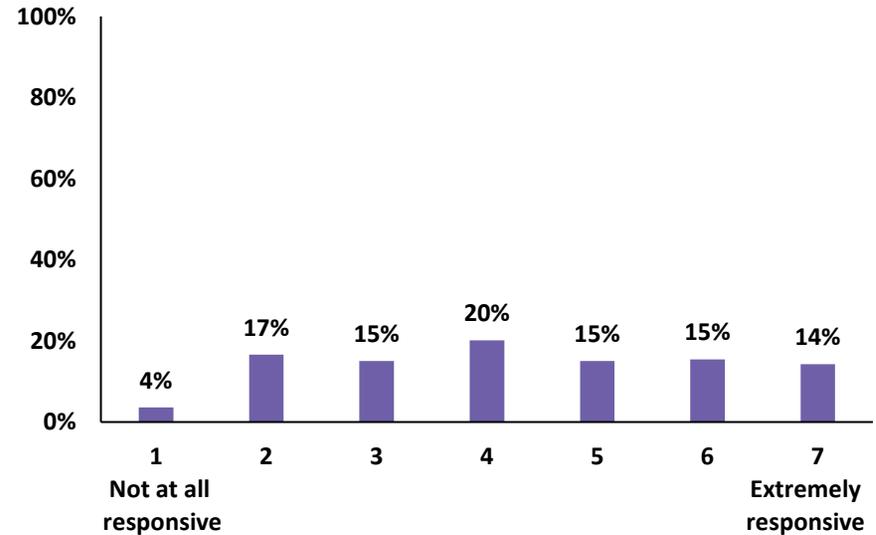
C. City of Toledo Employee Climate Survey — Workplace culture

Responsiveness to Complaints

Employees were asked how responsive they feel the City is to employee complaints. About 44 percent of respondents indicated that the City is responsive (chose a rating of 5 or higher), 20 percent of participants were neutral (chose a rating of 4) and 36 percent reported that the City is not responsive to complaints (selected a rating of 3 or lower).

Female employees were more likely to give lower scores regarding City responsiveness than male employees did. More than half (53%) of male participants reported that the City is responsive to complaints (selected a rating of 5 or higher) compared to 40 percent of female participants.

C-22. Participants' ratings of how responsive the City is to employee complaints



Note: N = 253.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

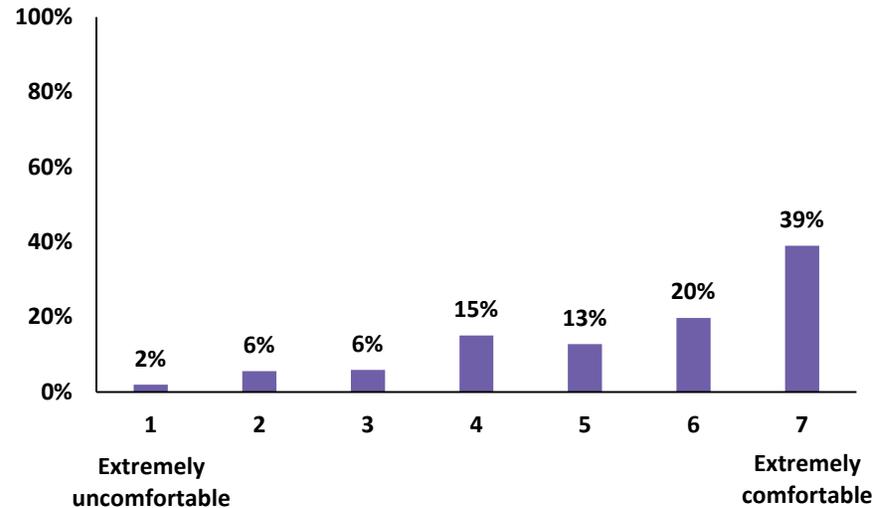
Employees' Level of Comfort Reporting Discrimination, Bullying or Sexual Harassment

Employees were asked to provide a rating that represented how comfortable they feel discussing an instance of discrimination, bullying or sexual harassment with their direct supervisor or union representative on a scale from 1 to 7, where 1 is “extremely uncomfortable” and 7 is “extremely comfortable.”

Nearly three-quarters of participants (72%) indicated that they would feel comfortable reporting an instance of discrimination, bullying or harassment with their direct supervisor or union representative (selected a rating 5 or higher) and 15 percent were neutral (selected a value of 4). The remaining 15 percent of those providing scores reported some level of discomfort in having such a discussion with a direct supervisor (chose a rating of 3 or lower).

Results are presented in Figure C-23 on the right.

C-23. Participants' comfort level discussing discrimination, bullying or sexual harassment with direct supervisor



Note: N = 359.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

Suggestions for the City to Address Instances of Discrimination, Bullying or Sexual Harassment

Employees were asked a follow-up open-ended question regarding how, if at all, the City can better address any instances of discrimination, bullying or sexual harassment affecting employees who might occur.

Education and training. Many open-ended comments indicated that improvement could be achieved through better education of leadership and others to prepare employees in advance to deal with any issues that may arise.

Fear of retaliation. Numerous respondents commented that they have seen instances of retaliation, bullying or harassment go unaddressed and/or that employees would be more comfortable communicating such behavior if they were not afraid of additional harmful consequences.

Give clear and supportive training to leaders on what their role is when seeing discrimination, bullying or sexual harassment, as well as when it is reported to them.

White female employee

Annual trainings to stop and bring awareness to fringe behaviors.

African American female employee

Supervisory experience and periodic training.

White male employee

Leadership is not willing to write things up out of fear of repercussions.

Minority male employee

Anytime an employee files a complaint that employee is retaliated against by supervisors.

African American female employee

I don't think these issues are dealt with and those who come forward are often disregarded. Then the ones who make complaints still have to work for individuals on whom they filed complaints.

White male employee

Employees would feel more comfortable reporting incidents if they were not afraid of blowback or being shunned as a result of participating in a complaint.

Minority female employee

C. City of Toledo Employee Climate Survey — Workplace culture

Unbiased and timely investigations. When employees were asked a follow-up open-ended question regarding how, if at all, the City can better address any instances of discrimination, bullying or sexual harassment, some remarked that timely and unbiased investigations could help.

Participants also mentioned that having a third-party entity investigate such instances could be helpful.

Examples of comments are shown on the right.

Notably, none of the open-ended comments received for this question specifically mentioned the option for City employees to bring complaints to the Office of Diversity, Equity, and Inclusion, which can then conduct an investigation.

By truly listening and investigating, then act on what is found out! When false reports are made, the person making the false report should be penalized. Just as if the report would be true the guilty would be penalized.

African American female employee

Investigate complaints in a more timely fashion and/or address the issue at hand immediately as opposed to months later.

White female employee

Get involved, investigate and keep an open mind. Do not be biased, or else have an outside group do the investigations.

Hispanic or Latina female employee

Be fair and impartial. If there were an instance of discrimination, bullying, or sexual harassment, do not have the same person represent both sides.

African American male employee

A third party impartial entity should handle complaints. Internal friends of friends and higher ups can interfere in the process.

Employee

C. City of Toledo Employee Climate Survey — Workplace culture

Below, Keen Independent concludes our analysis of employee suggestions about how the City might respond to any instances of discrimination, bullying or sexual harassment.

Accountability of leadership. Some survey respondents emphasized the importance of holding all employees accountable for their actions, regardless of job role. Others reported that they have witnessed instances of favoritism by leadership.

Reporting practices. Some participants indicated that the City's structure for reporting discrimination, bullying and sexual harassment could be improved. Some commented on the need for anonymous reporting.

Although the City responds to employees' complaints, there is no resolution. No one is held accountable for their actions.

Female employee

It seems as if no one is held accountable ever.

White male employee

Stop the favoritism and stop picking on employees for every little thing and treat everyone equally.

Hispanic or Latina female employee

The City must start holding leadership accountable.

White female employee

Supervisors should be held to the same standards as their subordinates would if they were being bullied or discriminated against. In the past, when people file complaints or discrimination, the response was, 'Oh that's just their personality, don't take it personally.'

Hispanic or Latina female employee

Providing more female support staff to take complaints to, rather than a male supervisor who may not see things the same way or take things as seriously as they should.

White female employee

There was an anonymous reporting site and it's gone.

African American female employee

Maybe have an anonymous hotline to report issues.

White female employee

C. City of Toledo Employee Climate Survey — Workplace culture

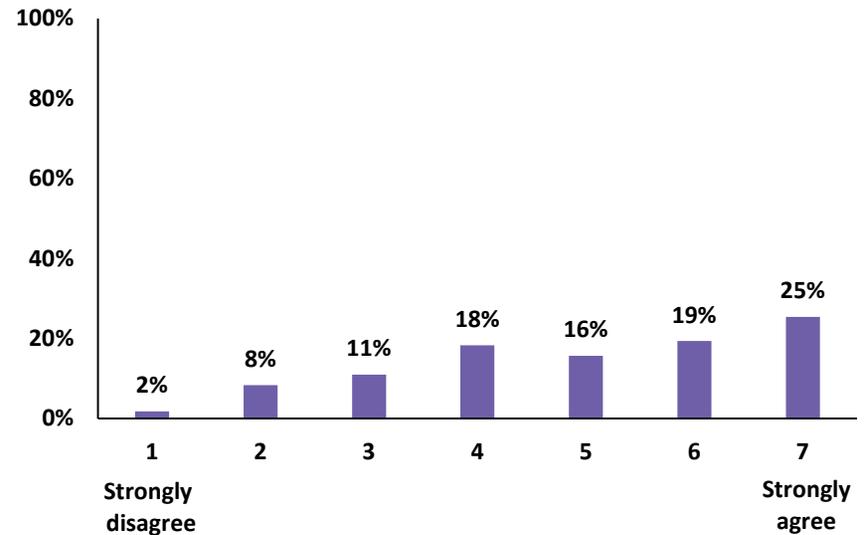
Support and Resources

Employees were asked to rate the extent to which they agree that they receive the support and resources necessary to be successful in their role with the City. They scored the City on a scale from 1 to 7, where 1 is “strongly disagree” and 7 is “strongly agree.” Participants were also given the option of responding with “I don’t know/no opinion” (which is not shown in the graph).

About three in five employees agreed or strongly agreed that they receive the support needed to succeed in their respective jobs. About one-fifth of respondents selected a value of 3 or less. About the same share of women and men gave negative scores for this question.

Figure C-24 on the right presents the response distribution.

C-24. Respondents’ perception that they receive needed support to succeed in their current job



Note: N = 382.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Workplace culture

As a follow-up question to whether they receive the support and resources necessary to be successful in their role with the City, respondents were asked to share why they provided the rating they did. Those who indicated that they do not feel they have the support necessary to succeed in their role cited various reasons for their responses, including the following:

- Outdated resources and equipment;
- Lack of sufficient training;
- Need for more support from managers; and
- Increased workload without adequate compensation.

Examples of comments are provided on the right side of the page.

The systems I work with are extremely slow. They are getting slower and slower, which results in inefficient use of time, and errors.

White female employee

We don't have the tools and vehicles to get things accomplished in my department.

White male employee

It has basically been "figure it out" as you go along approach. I feel that there could be a much more structured training program.

Employee

There are some platforms and software that is used in my department that I have never been trained on.

African American female employee

Completely insufficient onboarding.

White male employee

Most of my support comes from outside my department and not from my Director.

White female employee

Some managers hinder qualified employees' room for growth.

African American female employee

It seems like the work load is increasing but the compensation and support is not. It seems like management does not want to acknowledge the increased demands of the job.

White male employee

C. City of Toledo Employee Climate Survey — Impressions of pay equity

Employees were asked a series of questions regarding their impression of equitable pay by the City.

Pay Equity

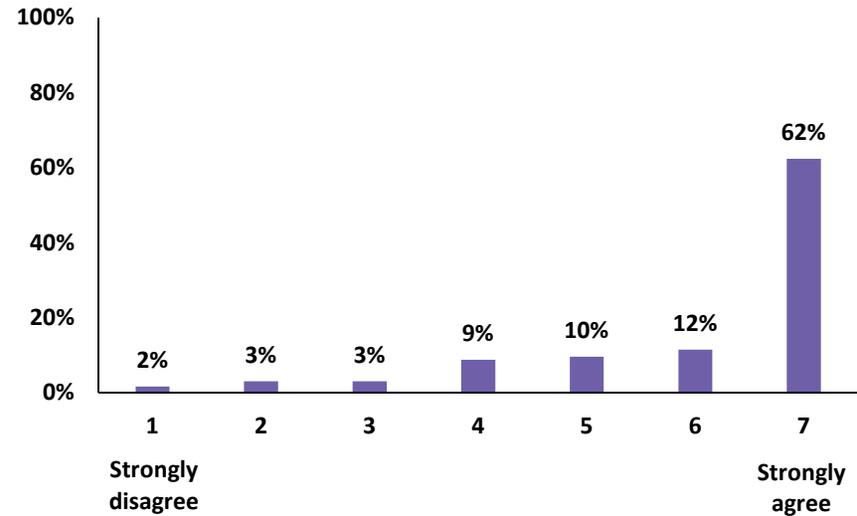
Survey participants were asked to rate their belief that employees with the same job title and responsibilities are paid equally regardless of gender, race, age and other identity.

About 84 percent of respondents indicated that they believe the City provides fair compensation for those with the same job title and description, including 62 percent who strongly agreed (selected a rating of 7). Just 8 percent of participants chose a rating of 3 or less, and 9 percent chose a value of 4 (neither agree nor disagree).

Female employees (12%) were four times more likely than male employees (3%) to report that they disagreed with receiving equal pay for the same job title and responsibilities (selected a value of 3 or less).

Figure C-25 on the right presents the response distribution.

C-25. Participants' belief that the City pays employees equally for the same job title and description



Note: N = 364.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of pay equity

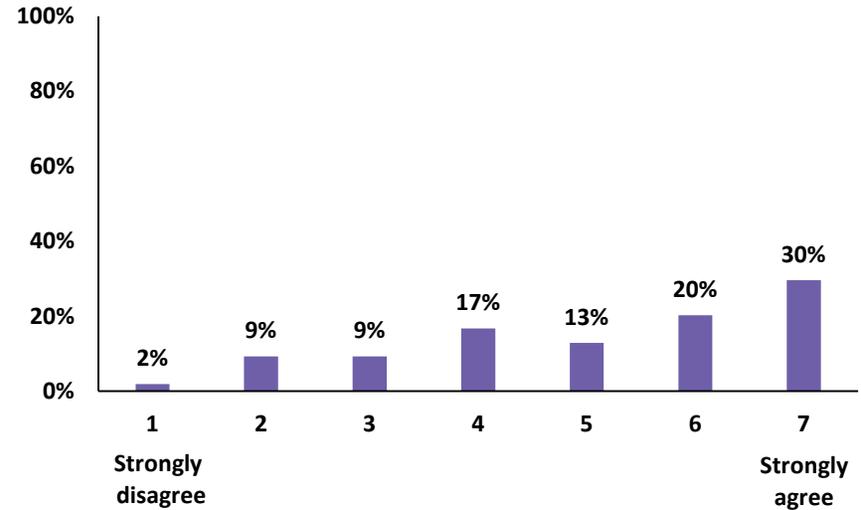
Policies and Practices

Employees were asked if they believe the City had effective policies to promote fair pay.

As shown in Figure C-26, 20 percent of respondents disagreed or strongly disagreed that the City's policies and practices effectively promote fair pay (chose a value of 3 or less). Almost two-thirds agreed that the City's policies promote fair pay.

Among male employees who responded to this question, only 15 percent disagreed that the City's policies promote fair pay, while 24 percent of female employees disagreed.

C-26. Respondents' belief that the City has effective policies to promote fair pay



Note: N = 311.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of pay equity

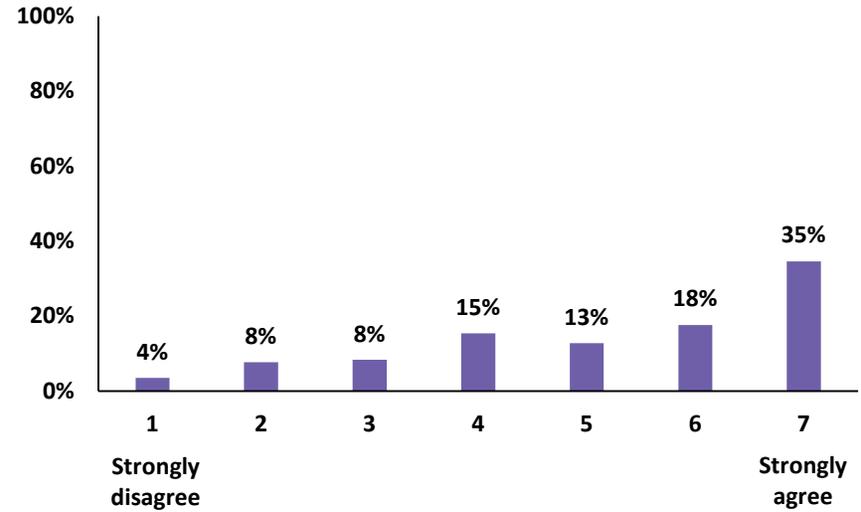
Comparable Pay

Employees were asked to what degree they believe their pay is comparable to others with similar job titles and responsibilities.

Roughly 20 percent of respondents disagreed with the statement that their pay is comparable to that of other City employees with similar responsibilities and job titles, while approximately two-thirds of participants agreed with the statement (selected a rating of 5 or greater). These responses are represented in Figure C-27 on the right.

Differences in ratings from women of color. Female employees of color were more likely than others to disagree that they have equal pay to those with similar responsibilities. About 32 percent of women of color disagreed that their compensation is similar to that of others with whom they share a comparable title and responsibilities, considerably higher than the 20 percent found of all respondents.

C-27. Participants' perception that they receive comparable pay to others with similar titles and responsibilities



Note: N = 312.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of pay equity

As a follow-up question, Keen Independent asked respondents to explain the rating they provided regarding comparable pay.

Negative impressions of whether they receive pay comparable to others. Of those respondents who believe their pay is not comparable to others with similar responsibilities and job titles, many provided responses pertaining to the following themes:

- Varied pay within same job classification;
- Varied responsibilities within a job classification; and
- No consideration of years of experience and level of education.

Comments are presented below and on the right.

I am aware that staff at the same job level as me are paid more. I am closer to the bottom of the range and there has not been explanation why. They need to be more transparent.

African American female employee

It is possible to have the same or comparable responsibilities as someone else with a higher paying job title within the City. It seems no one audits positions/job duties to ensure pay is equitable.

Employee

My pay is far lower than comparable job titles and responsibilities within the City.

African American female employee

There are far too many varying rates of pay across the city.

African American male employee

Pay is comparable with others of the same job title, but the responsibilities and expectations of the job are different for different people. The result is that I have to do more work to make up for the slackers.

White female employee

I have others in my classification that don't produce the volume or skill that I do. I am tasked with constantly aiding those in my same class or above my classification, and I feel the disparity in my skills, background, and experience vs my wage is growing greatly.

Employee

A clerk in one division may do way more work than a clerk in a second division.

White female employee

The City claims to pay its employees off of experience and merits, but never once has done any sort of performance review. No evaluation of merits at all in fact.

White female employee

Salary ranges are given for positions, but experience and education are not taken into consideration in determining that pay.

African American female employee

C. City of Toledo Employee Climate Survey — Impressions of pay equity

Positive impressions of whether they receive pay comparable to others. Among those who agreed or strongly agreed (selected a value of 5 or greater), some cited union membership as a reason for perceived equal compensation.

Others indicated that pay is comparable among City employees but outside agencies and employers pay more.

Examples of comments are shown on the right.

My position is union so therefore the pay is the same.

African American female employee

It's a union shop.

White male employee

I know that people with the same experience and qualifications in my job with the same responsibilities are paid the same as me because it's part of our Union contract.

White female employee

I'm paid similarly within the City, but much less than similar jobs throughout the state.

White male employee

Similar in the city but not similar with other cities.

Employee

It is equal to other employees for this city. However, the pay is not equal to other departments with the same workload.

Male employee

Our police department is far behind comparable cities in size and our surrounding suburbs.

Hispanic American male employee

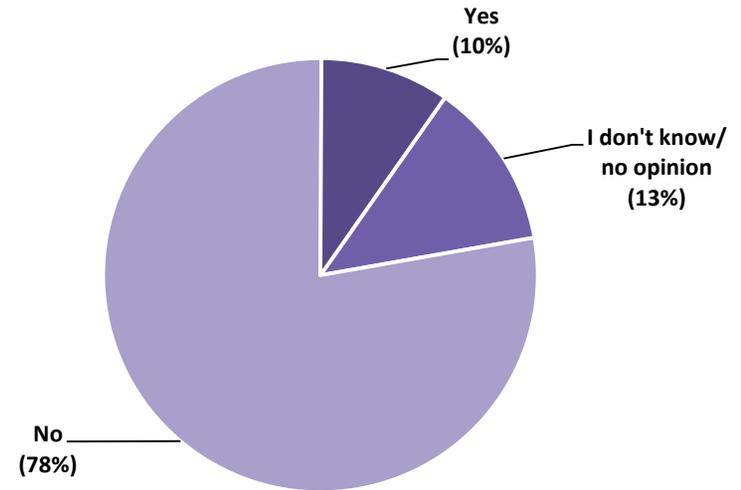
C. City of Toledo Employee Climate Survey — Impressions of pay equity

Relationship Between Gender and Pay

Employees were asked if they felt that their salary or pay rate was impacted by their gender. About 10 percent of survey respondents reported feeling that their pay is influenced by their respective gender.

Response distribution by gender. Among female employees, about 15 percent indicated that their pay was influenced by gender, compared to only 4 percent of male employees who believed their pay was influenced by gender.

C-28. Participants' responses to whether they believe their pay is impacted by their gender



Note: N = 456.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of pay equity

Comments about why they felt that their salary or pay rate was impacted by their gender. As a follow-up question, employees who responded “yes” were asked if they had any insights as to why they responded the way they did.

Some employees reported that male employees are more likely to be promoted than female employees. Others indicated that female employees make less money for performing the same job duties.

Examples of comments are shown on the right.

Promotions, not pay directly.

White female employee

I believe that if I was a male, my previous boss would have reclassified me a long time ago.

White female employee

The fact is that there are more males with higher positions than females. Also, females still are paid less than male counterparts even though their work is the same or similar.

White female employee

I know that there are men who make more than me in the same role and I've been here longer and have a larger role than them.

African American female employee

From past experiences with male counterparts.

African American female employee

A male in my office with barely any more experience than me is at a higher pay rate than I am (and we don't have any sort of performance reviews so there's no evidence that merits play into our pay at all). That's fine, technically he has more experience, however small. However, that same male also makes more than another female in our office who has more experience, yet her pay rate is lower than his. Some of the hires that have started after me, who are males, were brought in at a higher rate than when I'd first started even though I came to this office with outside experience and these hires were straight out of school. So, the only logical conclusion I can draw is that it was based, at least in part, on my gender.

White female employee

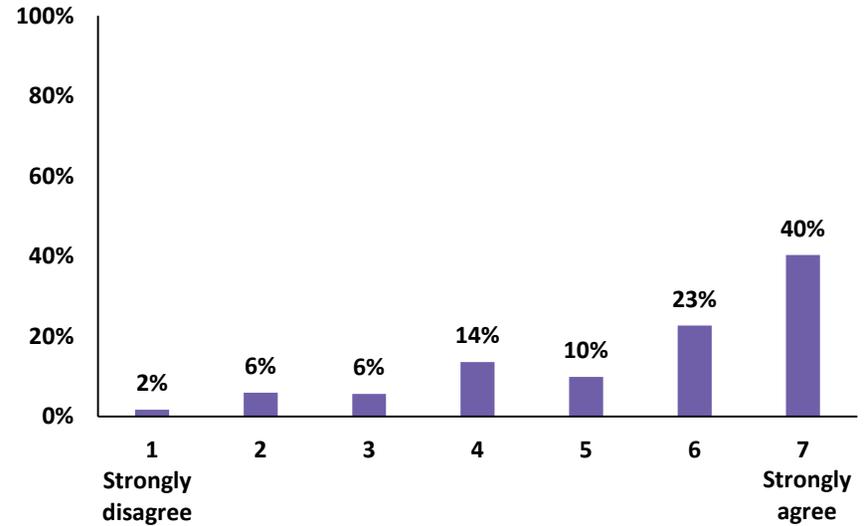
C. City of Toledo Employee Climate Survey — Impressions of pay equity

Pay Transparency

Keen Independent asked respondents to indicate to what degree they believe that the City is transparent about its pay rates or salaries for all employees.

About three-quarters of respondents agreed that the City is transparent about its pay rates or salaries for all employees, with 40 percent of respondents strongly agreeing with that statement (selected a 7 rating). About 14 percent of survey participants provided a neutral response, and another 14 percent disagreed (see Figure C-29 on the right).

C-29. Respondents' opinion that the City is transparent regarding pay rates



Note: N = 352.

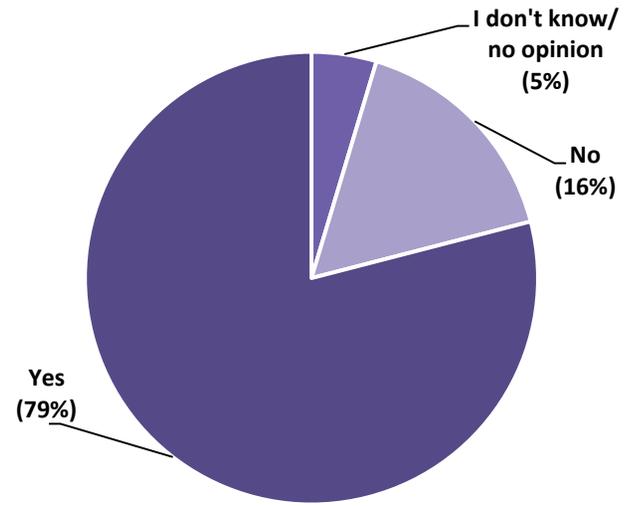
Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of pay equity

Access to Information About Compensation Rates

Employees were asked if they knew where to look to determine the pay rate for their position. Nearly four in five participants responded “yes,” that they do know where to look for this information. About 16 percent indicated that they do not know where to find pay rate information for their position. These results are presented in Figure C-30.

C-30. Whether participants know where to look for the pay rate for their position



Note: N = 453.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

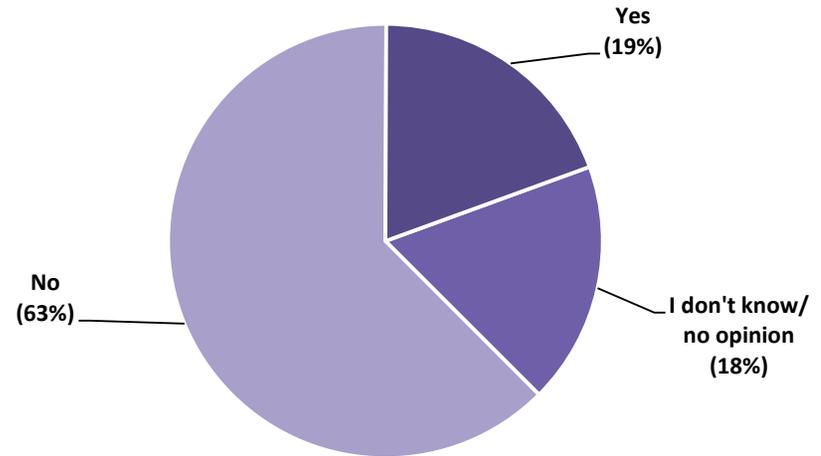
C. City of Toledo Employee Climate Survey — Impressions of pay equity

Starting Pay Rate

Employees were asked if they felt they started their job at a lower salary or pay rate than their colleagues based on their experience and qualifications. Nearly one in five participants indicated that they felt they did start at a lower pay rate than others with comparable qualifications (19% of respondents). Additionally, about one in five employees were uncertain or did not have an opinion (18% of respondents). The remaining 63 percent indicated that they do not feel that their starting pay was less than other colleagues with similar backgrounds. Figure C-31 on the right presents these results.

Gender differences. Further analysis indicated differences between female and male respondents. Among female participants who identified their gender in the survey, about 28 percent believed they started at a lower salary than that of other comparably educated and experienced colleagues. Among male employees who provided their gender in the survey, only 19 percent believed that they started at a lower salary than their similar colleagues.

C-31. Whether participants believe their starting pay rate was lower than colleagues with similar experience and qualifications



Note: N = 454.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of pay equity

Comments about why they felt they started their job at a lower salary or pay rate than their colleagues. Employees who reported that they believe their starting pay was lower than similarly experienced colleagues were asked if they believed this starting pay difference was based on their gender, race, age or other identities. Many were not sure what the reasons were, only that their pay rate was lower than that of others. Among those with an opinion regarding why their pay was lower, the following themes were identified:

- Gender, race and age; and
- Pay structures at the time of hiring, some related to unions.

Comments are presented on the right.

Age, mainly. Gender, second.

White female employee

Race and gender

African American female employee

Race and age.

African American female employee

Age discrimination.

Hispanic American male employee

Yes, I definitely feel that my pay was based on my race. I've seen too many persons of color be paid on a lower scale than non-minorities. It's common practice.

African American male employee

I do not feel that based on my gender or race but my younger age. Based on my qualifications and education, I would have been hired at other places with a substantially higher pay rate and would have taken it, had I not needed the cities health insurance.

White male employee

I feel it had more to do with the initial pay structure which focused on tiered pay for retention purposes.

African American male employee

I started at the payrate I did due to the union contracts.

White female employee

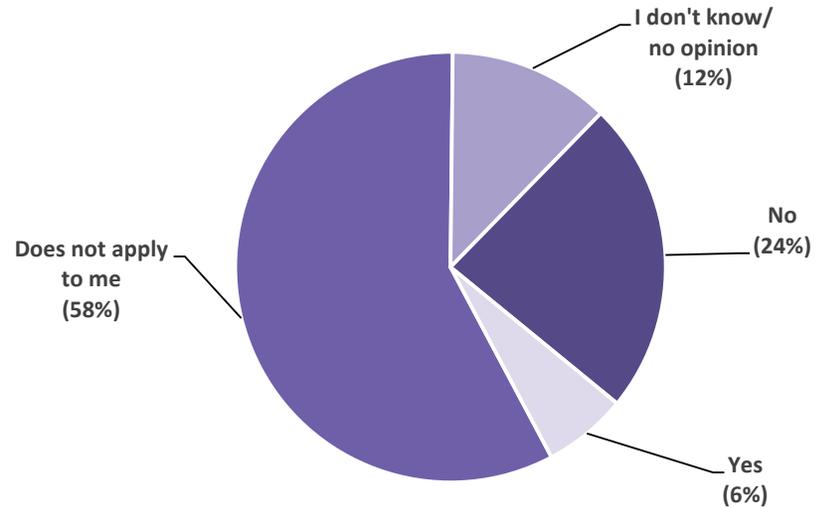
C. City of Toledo Employee Climate Survey — Impressions of pay equity

Pay Negotiation

Employees were asked to disclose whether they are an exempt employee, and if so, whether they have had the opportunity to individually negotiate their salary or pay rate. The majority of respondents (70%) either did not know or reported that the question did not apply to them. An additional 6 percent said yes, and 24 percent responded that they were not able to individually negotiate their salary or pay rate at hiring. These results are shown in Figure C-32 on the right.

As a follow-up question, employees who said “yes” to having individually negotiated their salary with the City were asked to expand on this experience. Most respondents indicated that they negotiated their pay rate when they were hired, with varying levels of reported success. Comments are presented on the bottom right.

C-32. Whether exempt employees were able to individually negotiate pay rate



Note: N = 428.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025

I negotiated when I first started but later found out I still started off lower than people in similar positions.

African American female employee

When I was hired, I attempted to negotiate my rate but was denied. My experience in the role before becoming permanent, along with my college degrees, did not matter. I was still a Black woman.

African American female employee

C. City of Toledo Employee Climate Survey — Impressions of pay equity

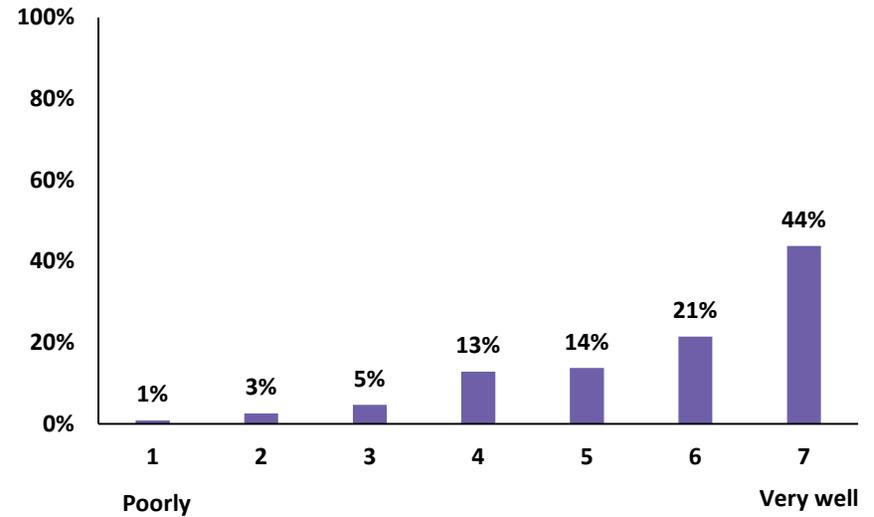
Gender Discrimination in Pay

Employees were asked how effectively the City is achieving its goal of eliminating gender discrimination in pay. Nearly four of every five respondents indicated that the City was doing well or very well (selected a rating of 5 or higher) in efforts to eliminate gender discrimination in pay (79% of participants). About 9 percent of employees reported the City was doing poorly at achieving this goal (chose a rating of 3 or lower).

Female employees were almost twice as likely (9%) as male workers (5%) to indicated that the City was doing poorly at achieving this goal.

Figure C-33 on the right presents the full response distribution.

C-33. Participants' opinion of the City's efforts in eliminating gender discrimination in pay



Note: N = 233.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of pay equity

Employees were then asked to provide more context regarding how effectively the City is working to eliminate gender discrimination in pay. The following themes were identified, and examples of responses are provided on the right.

Lack of awareness or information. Many respondents indicated that they were unaware of the City’s efforts at eliminating gender pay discrimination. Others indicated that they do not know how much other City employees are compensated and therefore cannot make an educated assessment.

Instances of pay discrimination. Among those who reported that the City is doing poorly at eliminating gender discrimination in pay, some reported perceptions that discrimination still appears to occur at the City.

I'm not aware of any efforts that have been made. It would be nice to have explicit reports on this.

African American female employee

I have not seen any reports on this.

White female employee

I don't know how I would determine that.

African American female employee

I don't know what every city employee gets paid.

White male employee

I can see a disparity within my own department. There are no clear parameters at all on how pay rates are determined or how raises are evaluated. All I can see is females with a lot more experience and males with less and making nearly identical pay.

White female employee

Minority women are always paid lower than non-minority women. Minorities as a whole are discriminated against when it comes to pay.

African American male employee

Men are generally paid higher salaries than women.

White female employee

Human Resources should have a monitoring system to rout out gender discrimination.

African American female employee

C. City of Toledo Employee Climate Survey — Impressions of pay equity

Positive perceptions. For those who reported that they believe the City is doing well at eliminating gender pay discrimination, some indicated that they have no knowledge of discrimination. Others remarked that union agreements and published City pay rates help prevent pay discrimination. Comments are presented on the right.

Publicly posted pay rates help this.

White male employee

Union contracts prevent inequitable pay based on gender.

Female employee

The gender wage gap does not exist in my department thanks to collective bargaining.

Employee

All I see is fair treatment.

Asian American, Pacific Islander or Native Hawaiian female employee

C. City of Toledo Employee Climate Survey — Impressions of hiring and advancement

Gender-based Discrimination in Hiring

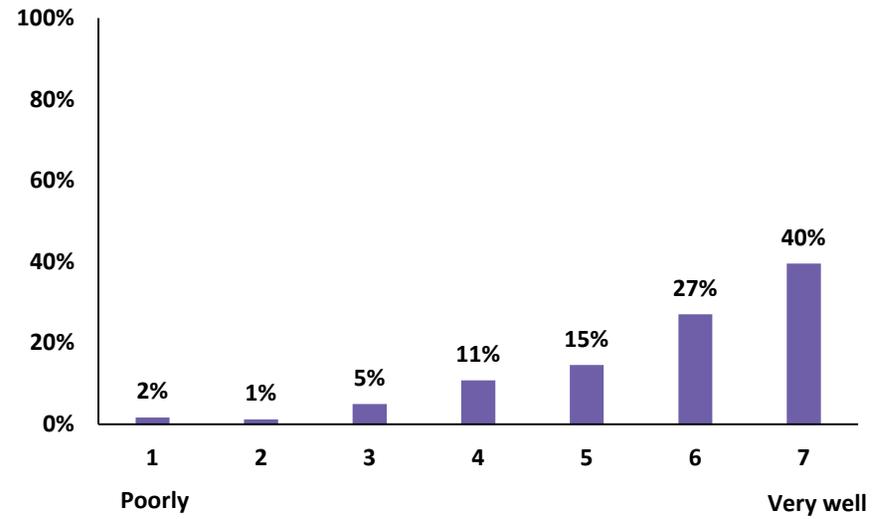
Respondents were asked to rate how effectively the City is working toward the goal of eliminating gender discrimination in hiring on a scale from 1 to 7, where 1 is “poorly” and 7 is “very well.”

More than 80 percent of participants indicated that the City was doing well or very well (selected a rating of 5 or higher) in efforts to eliminate gender discrimination in hiring practices, while 8 percent of employees reported the City was not achieving the goal (chose a rating of 3 or lower).

Among male employees who responded to this question, 87 percent reported that the City is doing very well in achieving this goal compared to 81 percent of female employees.

The distribution of responses is shown in Figure C-34 on the right.

C-34. Participants’ opinion of how well the City is doing at eliminating gender discrimination in hiring



Note: N = 240.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of hiring and advancement

As a follow-up question, employees were also asked to provide an open-ended response regarding how effectively the City is working to eliminate gender discrimination in hiring.

High ratings. Respondents who gave the highest rating (7), meaning that the City is doing “very well” at eliminating hiring discrimination, provided the comments such as those on the right. Other comments shared similar themes.

Low ratings. Employees who reported that the City is doing poorly at eliminating gender discrimination in hiring provided a variety of responses from different perspectives. Representative comments are presented on the right.

I can't say I see any gender bias in the selection process across the divisions of the City.

White male employee

I have not seen any discrimination.

African American female employee

From what I have noticed, gender doesn't matter for any position.

White female employee

I see no effort being made.

White female employee

The City often hires based on gender. Women are seen as a riskier hire. Especially if children are involved.

African American male employee

Certain departments within the City are one-gender-dominated and difficult for other genders to be considered.

White male employee

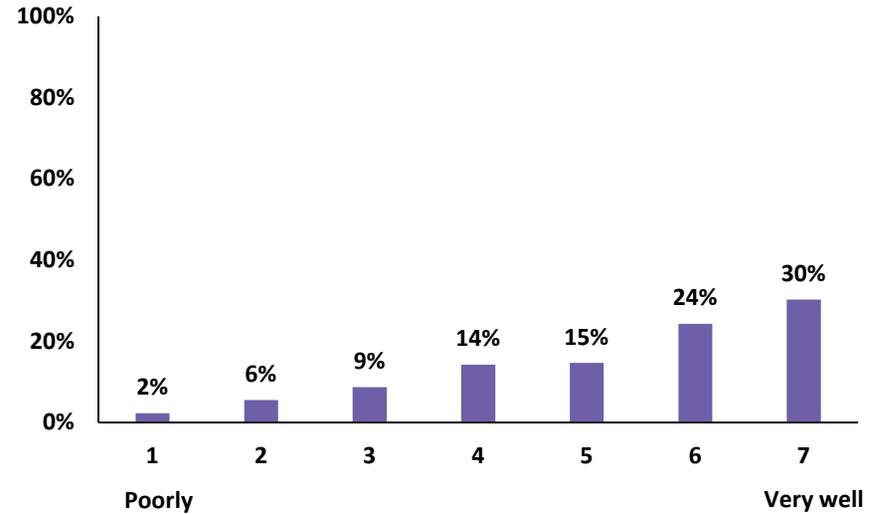
C. City of Toledo Employee Climate Survey — Impressions of hiring and advancement

Gender Discrimination in Promotions

Respondents were also asked to rate the City’s efforts to eliminate gender discrimination in its promotion practices. About 69 percent of employees provided a positive rating (response of 5, 6 or 7), while 17 percent indicated a negative rating (response of 1, 2 or 3). The response distribution is presented in Figure C-35 on the right.

Gender differences in responses. Results indicated differences between male and female employees. Among female employees who responded to this question (and provided their gender information during the survey), 21 percent chose a value of 3 or less. This is higher than the 8 percent of male employees who chose a value of 3 or less. Similarly, about 63 percent of women reported that the City is doing well (chose a value of 5 or greater), compared with 81 percent of men.

C-35. Participants’ opinion of the City’s efforts in eliminating gender discrimination in promotions



Note: N = 218.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Impressions of hiring and advancement

As a follow-up question, respondents were asked to elaborate on their rating City’s efforts in eliminating gender discrimination in promotions. Examples of comments from respondents who selected a rating of 3 or below in the previous question are presented to the right.

Personal experience with discrimination. Some survey participants indicated that they have personally experienced or witnessed discrimination in the City’s promotion processes. Respondents described situations where they believed more qualified individuals were overlooked in favor of less qualified candidates and noted concerns about gender influencing promotion decisions.

General observations about how promotions happen within the City. Other respondents described workplace dynamics and practices that they felt contributed to unequal opportunities in promotions. Some noted that women were generally accepted in traditionally female-dominated roles but face more resistance when pursuing positions outside of those roles, even when they are as qualified as their counterparts.

Examples of other comments are also shown on the bottom right.

I have seen both well qualified people blocked from a position and lesser qualified people promoted.

African American female employee

I know some female employees who were not promoted, likely due to their gender.

Employee

I’ve been passed over numerous times for a different gender without the experience or education that I have.

Employee

I have seen them discriminate during interviews and change scores.

Female employee

I have seen men being promoted over women regardless of experience and knowledge of the job.

Female employee

In traditional female roles, women do fine. In roles that are not traditional female roles, but the female has better qualifications, the female can be overlooked. We just don't look as good in a suit and tie.

White female employee

Some positions are test-based promotions, others are hand-picked, and they are usually picked based more on what looks better for the City and not always on merit.

White male employee

There is still an older mentality within the city.

African American male employee

C. City of Toledo Employee Climate Survey — Training

Training Opportunities

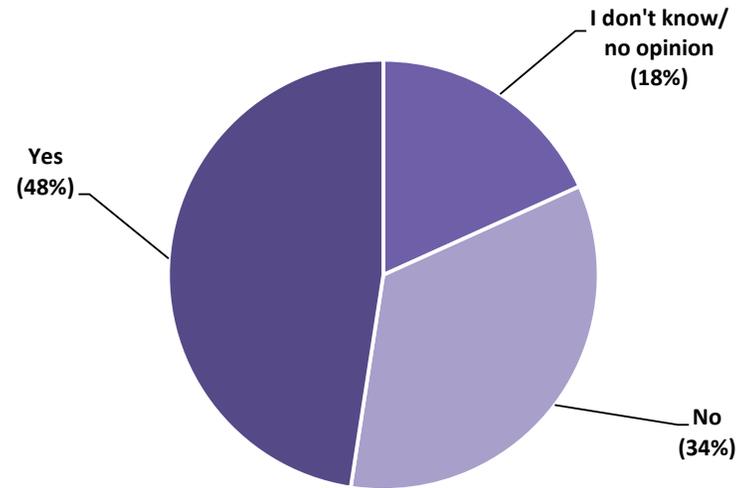
Survey participants were asked if they feel that they were offered the same training as other City of Toledo employees. Slightly less than one-half of employees reported having the same training opportunities as others, with another 34 percent of respondents indicating that they have not had the same training opportunities as others. The remaining 18 percent of participants were not certain or had no opinion. Results are shown in Figure C-36 in the righthand column.

Among participants that responded to this question and also reported their respective race/ethnicity and gender, there were differences between male and female respondents as well as between respondents of color and white respondents.

Response differences by gender. Among women who identified their gender and provided a definitive response (selected “yes” or “no”), about 53 percent reported that they received the same training opportunities as others, compared to 69 percent of men who indicated having the same training opportunities as others.

Response differences by race/ethnicity. Respondents of color were also less likely to respond “yes” to this question (46%) than white respondents (64%).

C-36. Participants’ opinion of whether they have had the same training opportunities as other employees



Note: N = 433.

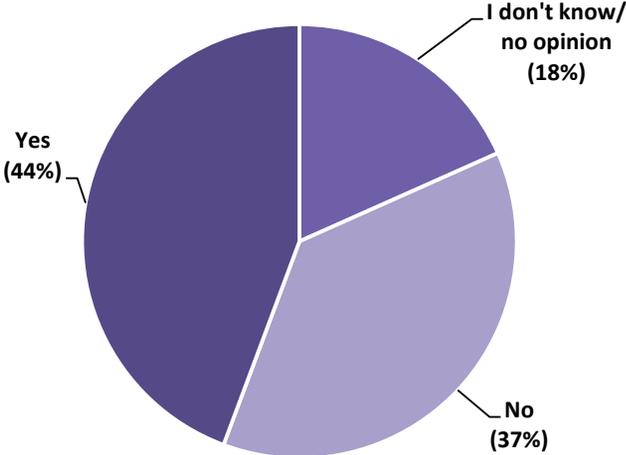
Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Training

Nondiscrimination Training

Participants were asked whether they had previously attended any nondiscrimination training provided by the City. About 44 percent of respondents indicated that they had done so in the past (see Figure C-37).

C-37. Whether respondents have attended nondiscrimination trainings with the City of Toledo



Note: N = 431.
Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Training

As a follow-up question, respondents were given the opportunity to provide open-ended responses regarding details about the nondiscrimination training provided by the City as well as whether the City should continue to provide such training. Common themes are summarized below and presented on the right.

Implementation of nondiscrimination training. Some respondents indicated that they noticed that little or nothing changed following the City’s training.

Training opportunities. Some participants reported that they hope the City continues to have nondiscrimination training and others remarked that they do not want such trainings to continue.

Our Department had sensitivity training for the entire department. The Director is the main person that crosses the lines when it comes to treating people fairly.

African American employee

I think all training is valuable. However, I am not sure that this training is successful as bullying still occurs and continues to be ignored.

White female employee

Useful info but not upheld by all higher administrators.

White male employee

It was the stereotypical training that is online. It’s nice if it actually occurs. Sadly, it does not get practiced.

Female employee

It was a discrimination and harassment training. I think it was useful and necessary.

White male employee

Diversity training, yes, very informative.

Hispanic American male employee

I attended a DEI session. Yes, please continue to provide the training.

White female employee

DE&I provided training and yes it was useful and should continue.

African American employee

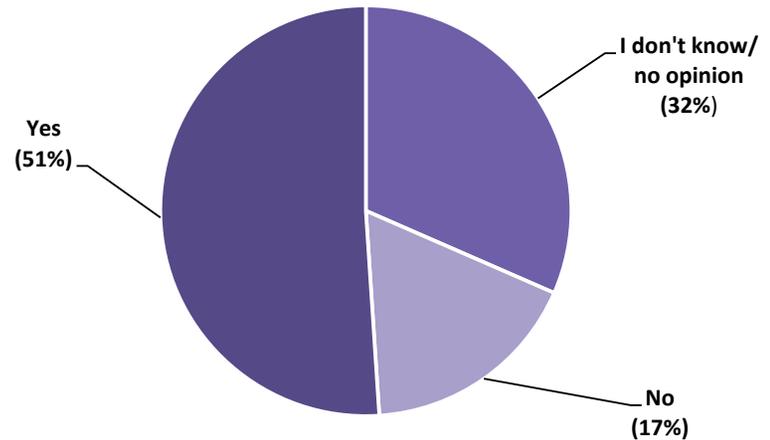
C. City of Toledo Employee Climate Survey — Training

Future Nondiscrimination Training

Survey respondents were then asked whether they believe the City should offer nondiscrimination-focused training in the future. Slightly more than half (51%) percent of respondents responded “yes,” while 17 percent responded “no.” The remaining respondents did not know or had no opinion. These results are shown in Figure C-38 on the right.

Among those who provided a yes or no answer and provided their gender, differences were found in responses between male and female employees. About 84 percent of female employees responded that the City should offer future nondiscrimination training, compared to 75 percent of male employees.

C-38. Participants’ opinion of whether the City should offer future training related to nondiscrimination



Note: N = 431.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

C. City of Toledo Employee Climate Survey — Training

Employees who answered definitively (either “yes” or “no”) regarding whether the City should provide future nondiscrimination training were then asked to elaborate on that opinion. Responses are summarized below and to the right and on the following page.

Comments suggesting no need for nondiscrimination training.

Among those who indicated that the City should not provide future nondiscrimination training, several themes emerged:

- Some employees expressed frustration with Diversity, Equity and Inclusion (DEI) policies and trainings more generally.
- Nondiscrimination training does not achieve its goals.
- Nondiscrimination training can result in feelings of resentment.

Examples of comments are provided on the right.

This City is so focused on not discriminating that they've over-compensated and now discriminate against another group of individuals.

Male employee

Employees should be made aware of nondiscrimination policies, but all DEI practices should be eliminated.

White male employee

Discrimination should not exist, and DEI programs are a problem and not a solution.

Employee

No amount of training is going to change anyone's personal bias.

Employee

I think it's better to actually change the culture and hold people accountable as the training is obviously not working.

Female employee

I don't think it will help change people's internal biases. I believe creating mandatory training may make the problem worse by creating resentment due to the mandatory status of the training.

Female employee

It causes tension.

Employee

C. City of Toledo Employee Climate Survey — Training

Comments about why a need for continued nondiscrimination training. Employees who believe the City should continue nondiscrimination training discussed the benefits and provided suggestions for how training could be conducted.

The following themes were discussed:

- Nondiscrimination training can strengthen individuals and the workforce.
- Trainings can create common goals and highlight shared experiences.
- Benefits of communication.
- Non-threatening training.

Examples of comments are provided on the right.

Diversity of thought makes for a more resilient and capable workforce.

African American male employee

Sustaining these efforts ensures that workplace policies remain clear and that employees are equipped to contribute to a respectful and inclusive environment, regardless of external factors.

White employee

Training makes for communication and common goals.

Hispanic or Latina female employee

The training sessions should be interactive to highlight the shared experiences and commonalities among participants.

African American female employee

New employees may be unaware of the importance of this and how discrimination can be implicit.

White male employee

People can be ignorant or have old habits that they don't realize need to change.

White male employee

Yes, but you will need to be very intentional and creative with how it is done. People tend to be dismissive and defensive with DEIA topics, unfortunately, so how this is done will make a difference.

African American female employee

C. City of Toledo Employee Climate Survey — Training

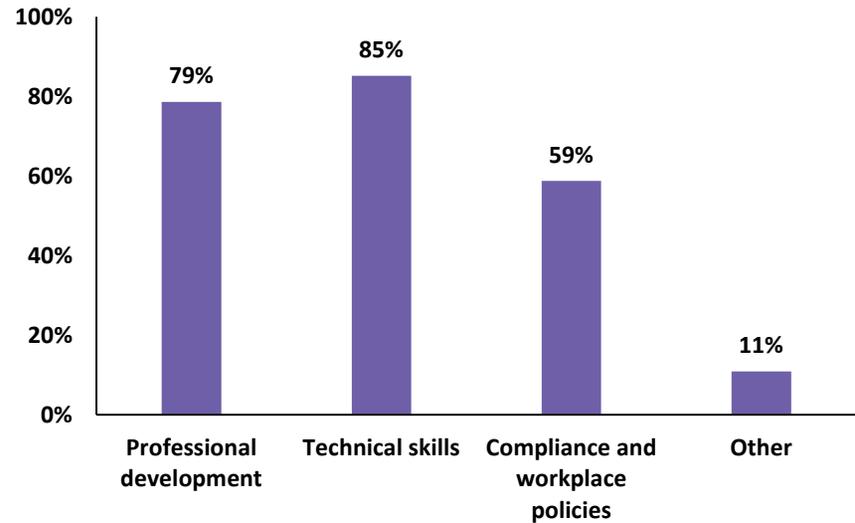
Additional Types of Training

Survey respondents were also asked what other types of training they would like to be offered by the City. Participants were able to select more than one response.

More than three-quarters of participants indicated that they would like to see professional development opportunities (79%), and about 85 percent of respondents indicated that they would like increased opportunities to develop technical skills. More than one-half of the survey respondents indicated that they would like to see the City offer training related to compliance and workplace policies (59%).

Examples of comments are presented on the bottom right.

C-39. Types of training participants would like to be offered by the City



Note: N = 398. Multiple answers permitted.

Source: Keen Independent Research, City of Toledo Employee Climate Survey, April 2025.

Gender identity training.

Employee

Human relations, such as how to treat subordinates.

African American employee

Management and Senior Leadership need mandatory communication training.

White male employee

Overview of what other departments/divisions do (sort of like an Ambassador Academy).

White female employee

C. City of Toledo Employee Climate Survey — Additional comments about workplace fairness

Finally, employees were asked to provide any additional comments they might have regarding workplace fairness at the City. Common themes are summarized below and on the following page, and comments are presented on the right.

Favoritism and Nepotism

Many reported that “who you know” is more important at the City than other factors, including merit and personal identifiers.

Examples of comments are shown on the right.

Everyone needs to be treated the same regardless of who they know or who they are tied to.

African American female employee

I do not feel there will ever be workplace fairness within the city, because their employment is based on who you know.

Female employee

The test that's being used to promote employees opens the door for favoritism and discriminatory practices and also disregards a person's seniority.

Male employee

I have seen multiple employees promoted within the City and never seen or heard of the job postings for certain positions? it seems that some employees are cherry picked for these jobs with no opportunity for others who may be interested or qualified?

White male employee

If you are not part of “the good ol' boy” club, fairness is far-fetched in some divisions. When you say something, you become a target for retaliation. Retaliation happens frequently within the City when you disagree with higher-ups or bring up issues that they don't agree with.

African American female employee

There is no fairness, it's favoritism and corrupt. It's not what you know or what you're willing to do but who you know.

White employee

C. City of Toledo Employee Climate Survey — Additional comments about workplace fairness

Transparency, Professional Development and Stereotypical Attitudes

Many respondents indicated that workplace fairness could be improved with better transparency surrounding training opportunities, promotions, reclassification and professional development.

Transparency as to why you didn't get the promotion/job.

White female employee

When the powers that be deny a training opportunity to an employee, be transparent as to why. When no explanation is given about the denial, employees do not know what to work on or correct to be successful on the next attempt.

African American male employee

Some departments have little or no opportunity for promotion or growth. This decreases morale when the only two options are to stay in a dead-end position or leave that department.

White female employee

Have annual reviews and provide opportunities for advancement.

White female employee

I currently work routinely above my classification and job duties. There is no longer an easily defined mechanism for job re-classification, so I am stuck until I either leave or threaten to leave.

White male employee

I began this position eager to make a difference as a public servant and to learn new skills, but I have been deflated and lack the support to grow in my role without the need to overcompensate to overcome stereotypes.

Minority employee

I have seen more discrimination based on race than gender.

African American female employee

C. City of Toledo Employee Climate Survey — Climate Survey

To promote participation, and in consideration of staff time, budgetary constraints and study timeline, Keen Independent combined the Gender Pay Equity Analysis Virtual Workshop and the Workplace Climate Survey into one document to be programmed into Alchemer. Keen Independent will provide the link to the combined survey that the City of Toledo disseminated to City staff.

Core questions were designed to be primarily closed-ended (using a 7-point Likert scale) followed by demographic questions. Open-ended questions are included to allow respondents to elaborate on their answers.

Introduction

The City of Toledo is committed to nondiscrimination.

To enhance efforts, the City engaged Keen Independent Research to review how well the City is achieving its mission to ensure a safe and nondiscriminatory work environment.

Keen Independent seeks your input on topics related to your experience as a City employee.

Your participation is extremely important, and we value your privacy. Results will be reported in aggregate for anonymity. All City employees are asked to participate. This survey will take approximately 15 minutes to complete. We appreciate your participation.

For additional information, please visit the study website at:

<https://www.keenindependent.com/studies/cityoftoledogenderequity>

C. City of Toledo Employee Climate Survey — Climate Survey

[Start]

1. For City employees, the City of Toledo is working to eliminate gender discrimination in the workplace. How effective do you think the City has been in achieving this goal?
[7-point scale from “poorly” to “very well”; add an “I don’t know/no opinion” option]

2. Why did you provide the rating you did?
[Insert open-ended response text box]

3. Have you observed or experienced any discrimination in your workplace as a City employee?
[Insert open-ended response text box]

4. How supportive is your direct supervisor of the City’s goal of eliminating gender discrimination in the workplace?
[7-point scale from “not supportive at all” to “extremely supportive”; add an “I don’t know/no opinion” option]

5. How, if at all, can your direct supervisor better support this goal?
[Insert open-ended response text box]

6. The City of Toledo’s workplace policies support fair treatment of employees.
[7-point scale from “strongly disagree” to “strongly agree”; add an “I don’t know/no opinion” option]

7. Why did you provide the rating you did?
[Insert open-ended response text box]

8. Do you feel safe in the workplace?

Yes

No

I don’t know/no opinion

9. Any comments and insights as to why you responded the way you did?

[Insert open-ended response text box]

10. I am satisfied with my interactions with my peers at work.
[7-point scale from “strongly disagree” to “strongly agree”; add an “I don’t know/no opinion” option]

11. If you feel you need to file a workplace complaint, do you know where to go within the City?

Yes

No

I don’t know/no opinion

C. City of Toledo Employee Climate Survey — Climate Survey

12. Are you comfortable filing a complaint or a union grievance related to the following?

Bullying Yes No I don't know/no opinion

Sexual harassment Yes No I don't know/no opinion

Discrimination Yes No I don't know/no opinion

Workplace violence Yes No I don't know/no opinion

Safety Yes No I don't know/no opinion

13. How responsive do you feel the City is to employee complaints?

[7-point scale from “not at all responsive” to “extremely responsive”; add an “I don't know/no opinion” option]

14. If it were to happen, how comfortable would you feel discussing an instance of discrimination, bullying or sexual harassment in your workplace with your direct supervisor or union representative?

[7-point scale from “extremely uncomfortable” to “extremely comfortable”; add an “I don't know/no opinion” option]

15. How, if at all, can the City better address any instances of any discrimination, bullying or sexual harassment affecting employees if they were to happen?

[insert open-ended response text box]

Please rate the extent to which you agree with each of the following statements. The rating scale goes from 1, which indicates “strongly disagree” to 7, which indicates “strongly agree” and if you are not sure, select the “I don't know/no opinion” option.

16. I receive the support and resources I need to be successful in my job with the City.

[7-point scale from “strongly disagree” to “strongly agree”; add an “I don't know/no opinion” option]

17. Why did you provide the rating you did?

[Insert open-ended response text box]

18. I believe that employees with the same job title and responsibilities are paid equally regardless of gender, race, age and other identities.

[7-point scale from “strongly disagree” to “strongly agree”; add an “I don't know/no opinion” option]

19. The City has effective policies and practices that promote fair pay.

[7-point scale from “strongly disagree” to “strongly agree”; add an “I don't know/no opinion” option]

C. City of Toledo Employee Climate Survey — Climate Survey

20. My pay is comparable to others with similar job titles and responsibilities within the City.

[7-point scale from “strongly disagree” to “strongly agree”; add an “I don’t know/no opinion” option]

21. Why did you provide the rating you did?

[Insert open-ended response text box]

22. Have you ever felt that your salary or pay rate was impacted by your gender?

Yes

No

I don’t know/no opinion

[If the answer to question 22 is no or I don’t know/no opinion, skip question 23 and proceed to question 24.]

23. Any comments and insights as to why you responded the way you did?

[Insert open-ended response text box]

24. The City is transparent about its pay rates or salaries for all employees.

[7-point scale from “strongly disagree” to “strongly agree”; add an “I don’t know/no opinion” option]

25. Do you know where to look to determine the pay rate for your position?

Yes

No

I don’t know/no opinion

26. Do you feel that you started your job at a lower salary or pay rate than your colleagues, based on your experience and qualifications?

Yes

No

I don’t know/no opinion

[If the answer to question 26 is no or I don’t know/no opinion, skip question 27 and proceed to question 28.]

27. Do you feel this was based on your gender, race, age or other identities?

[Insert open-ended response text box]

28. The City seeks to eliminate any gender-discrimination in hiring City employees. How effective do you think the City has been in achieving this goal?

[7-point scale from “poorly” to “very well”; add an “I don’t know/no opinion” option]

C. City of Toledo Employee Climate Survey — Climate Survey

29. Why did you provide the rating you did?

[Insert open-ended response text box]

30. The City seeks to eliminate any gender discrimination in pay of City employees. How effective do you think the City has been in achieving this goal?

[7-point scale from “poorly” to “very well”; add an “I don’t know/no opinion” option]

31. Why did you provide the rating you did?

[Insert open-ended response text box]

32. The City seeks to eliminate any gender discrimination in promotion of City employees. How effective do you think the City has been in achieving this goal?

[7-point scale from “poorly” to “very well”; add an “I don’t know/no opinion” option]

33. Why did you provide the rating you did?

[Insert open-ended response text box]

34. If you are an exempt employee, have you had the opportunity to individually negotiate your salary or pay rate as a City employee?

Does not apply to me

Yes

No

I don’t know/no opinion

[If the answer to question 34 is ‘does not apply to me’ or no or I don’t know/no opinion, skip question 35 and proceed to question 36.]

35. Can you elaborate on your experience?

[Insert open-ended response text box]

36. Do you feel you have had the same training opportunities and exposure (formal and informal) as other employees to increase your chances of promotional opportunities?

Yes

No

I don’t know/no opinion

C. City of Toledo Employee Climate Survey — Climate Survey

37. Have you attended any trainings regarding nondiscrimination in the workplace offered by the City?

- Yes
- No
- I don't know/no opinion

[If the answer to question 37 is no or I don't know/no opinion, skip question 38 and proceed to question 39.]

38. Please describe the training you attended. Do you think that it was useful and that the City should continue to provide it?

[Insert open-ended response text box]

39. In the future, should the City offer training that focuses on nondiscrimination in the workplace?

- Yes
- No
- I don't know/no opinion

[If the answer to question 39, is I don't know/no opinion, skip question 40 and proceed to question 41.]

40. Please explain your response.

[Insert open-ended response text box]

41. What other types of training opportunities would you like to see the City offer?
(check all that apply)

- Professional development (e.g., leadership, communication, career growth)
- Technical skills (e.g., software proficiency, data analysis, job-specific skills or tools)
- Compliance and workplace policies (e.g., safety training, regulatory updates, workplace procedures)
- Other: _____ [insert-open-ended response box for other]

42. Please use this space for any additional comments you have about workplace fairness within the City of Toledo.

[Insert open-ended response text box]

C. City of Toledo Employee Climate Survey — Climate Survey

Demographic data will be reported in aggregate and will not be used to identify respondents.

43. Please select your gender identity.

- Male
- Female
- Non-binary
- Self-describe: _____
- Prefer not to respond

44. Please select your age group.

- 28 or younger
- 29-43
- 44-59
- 60 or older
- Prefer not to respond

45. Please select your primary racial or ethnic group.

- American Indian or Alaska Native
- Asian American, Pacific Islander or Native Hawaiian
- Black or African American
- Hispanic or Latino
- Middle Eastern or North African
- White (non-Hispanic)
- Other group: _____
- Prefer not to respond

46. Please select your highest level of education (select one).

- High school or less
- Some college or vocational/trade school
- College degree
- Graduate work/degree
- Prefer not to respond

C. City of Toledo Employee Climate Survey — Climate Survey

47. Do you identify as a person with a disability?

- Yes
- No
- Prefer not to respond

48. Do you identify as LGBTQIA+?

- Yes
- No
- Prefer not to respond

49. How many dependents do you have under the age of 18?

- None
- 1
- 2
- 3 or more

50. How long have you worked for the City?

- 2 years or fewer
- 3 to 6 years
- 7 or more years
- Prefer not to respond

51. What best describes you?

- Exempt employee
- Nonexempt employee

C. City of Toledo Employee Climate Survey — Climate Survey

52. What best describes your job title and responsibilities at the City?

- Service - Maintenance (e.g., maintenance worker, sewer and drainage service worker, etc.)
- Skilled Craft (e.g., heavy equipment operator, automotive repair technician, mechanic, etc.)
- Administrative Support (e.g., administrative assistant, clerk, data entry, supervisor, etc.)
- Para-professional (e.g., administrative specialist, administrative technician, etc.)
- Protective Service (e.g., firefighter, paramedic, police officer, etc.)
- Technician (e.g., inspectors, code compliance, construction technician, data communication specialist, engineering technician, etc.)
- Professionals (e.g., administrative analyst, attorney, chemist, fire captain, fire lieutenant, police captain, police lieutenant, police sergeant, etc.)
- Officials and Administrators (e.g., manager, commissioner, director, etc.)
- Don't know
- Prefer not to respond

APPENDIX D. Quantitative Workforce Analysis

Keen Independent analyzed the City of Toledo's employment data to determine whether there were gender or racial disparities in the overall workforce, new hires, promotions and separations. The analysis was based on data provided by the City.

This report is organized in the following sections:

- Methodology;
- Workforce results;
- Hiring results;
- Promotion results; and
- Separation results.

D. Quantitative Workforce Analysis — Methodology

Keen Independent performed four types of analyses regarding the representation of gender and various people of color in City jobs: overall workforce, hiring, promotions and separations.

Employment Data

The City provided Keen Independent with employee data from 2017 through 2024. Data included:

- Employee identifier;
- Title;
- Department;
- Demographic information (race and gender);
- EEO-4 job category;
- Hiring date;
- Promotion date;
- Separation date; and
- Reason for termination.

Keen Independent reviewed the employee data and discussed data consistency with the City. Keen Independent, with the agreement of the City, restricted analysis for the 2021–2024 period.

Our analysis excludes any temporary or provisional workers to allow us to make comparisons over time.

EEO-4 job categories include the following:

- Officials and administrators;
- Professionals;
- Technicians;
- Protective service workers;
- Paraprofessionals;
- Administrative support workers;
- Skilled craft workers; and
- Service maintenance.

Racial and ethnic categories include:

- African American;
- American Indian or Alaska Native;
- Asian American;
- Native Hawaiian or Other Pacific Islanders;
- Hispanic American; and
- Non-Hispanic whites.

In some cases, there were too few individuals in specific groups to perform statistical analyses. For example, Keen Independent had to combine American Indians and Native Hawaiian or Other Pacific Islanders in the analysis.

We note that these combinations did not affect patterns in the results.

D. Quantitative Workforce Analysis — Methodology

Workers in the Local Labor Pool

Keen Independent defined the labor pool based on the locations of applicants to City jobs. Most applicants lived in Lucas and Wood counties. (Note that Fulton County is also within the Toledo metropolitan statistical area, but relatively few applicants came from that county.)

To compare the composition of City workers with what might be expected given the availability of workers for those jobs who live in Lucas and Wood counties, Keen Independent collected data for local workers from the American Community Survey (ACS) dataset for 2019–2023. Those data provide information about the demographic characteristics of local residents by occupation (the share of people in an occupation who are women, for example). We also used ACS data to calculate demographic benchmarks when examining City hiring.

Not all jobs at the City of Toledo matched well with Census occupation groups. For jobs that fell into an “Other” category for a particular EEO-4 group, demographics for all other City occupations in that EEO-4 group were aggregated. Further, the ACS does not include observations in Lucas and Wood counties for all occupations for City workers. In order to provide an accurate demographic profile of weighted availability, occupation weights were calculated to exclude those with no observations in the ACS data.

Analytical Approaches

For each type of employment analysis (overall workforce, hires, promotions and separations), the study team compared outcomes for City with calculated benchmarks.

City employees from 2021 through 2024 compared with workers in the local labor market. Keen Independent compared the demographic characteristics of permanent non-elected employees within each EEO-4 group with the characteristics of workers in those jobs living in Lucas and Wood counties. The first set of analyses were for all workers, no matter when they were hired.

The study team weighted the results of the availability analysis for each relevant occupation based on the share of City workers that held that job within the EEO group. For example, if Human Resources workers comprised 6 percent of the City positions within EEO-2 (Professionals), the data for people in the Human Resources occupation in the ACS data received that corresponding weight when determining overall demographic characteristics of workers for EEO-2 in the local labor market.

City hiring from 2021 through 2024 compared with workers in the local labor market. Keen Independent compared the demographic characteristics of City hires with the local labor force using the same approach as described above, except that the weights for the ACS data were based on the share of City hires for each position. For example, if Human Resources workers comprised 3 percent of City hires within EEO-2 (Professionals), the data for Human Resources workers in the ACS data received that weight when calculating the overall benchmarks for demographic characteristics of potential hires in the labor market.

D. Quantitative Workforce Analysis — Methodology

Promotions of City employees from 2021 through 2024. Keen Independent compared the demographic characteristics of those who received promotions with benchmarks derived from City data about all City workers, after adjusting for the likelihood of a someone in particular City job would receive a promotion. Results are reported by the EEO-4 category of the employee before receiving the promotion. The study team calculated a ratio of promotions per employee by dividing the number of people in each group who received a promotion by the average number of people employed in that group over the study period. Keen Independent averaged the number of employees per group for 2021 through 2024.

The EEO-4 group of the employees receiving the promotion was determined based on the job from which the individual was promoted.

The benchmark for expected number of promotions per employee by race/ethnicity and gender for an EEO-4 group was determined by:

1. Finding the total number of promotions (for all workers) in each year for each group of jobs for each tenure groups (how many years an individual had worked with the City);
2. Based on the share of total employees that the demographic group comprised for a group of jobs (and tenure group) in a year, calculating the expected number of promotions in that year (multiplying total promotions by share of employees for each year);
3. Summing results across all years; and
4. Expressing results as a ratio of promotions per employee (dividing expected promotions by average number of employees per demographic group).

City employee separations from 2021 through 2024. The study team calculated the number of separations per employee in the same way as the number of promotions per employee (discussed in the previous page). Separations due to death, disability or disability reasons were not included in the analysis. Because separations are more frequent among employees who were recently hired, the study team also controlled for job tenure when developing the benchmarks for people of color and women for each EEO-4 group.

Individuals were divided into tenure groups by the level of tenure they achieved. Tenure levels included in this analysis were:

- 0–3 years;
- 3–10 years; and
- 10+ years.

Keen Independent calculated expected number of separations for each tenure group. Weights were then determined based on the number of people of color (or women) in each tenure group to calculate overall expected separations per employee in each EEO-4 category.

D. Quantitative Workforce Analysis — Methodology

Disparity indices and “substantial disparity.” For each type of analysis for each group, Keen Independent calculated disparity indices by dividing observed outcomes by the benchmark for that group and then multiplying the result by 100.

- A value of “100” indicated parity for people of color or women. Keen Independent applied the 80 percent rule when determining whether a disparity index indicated a “substantial disparity.” Any indices below this 80 threshold are considered substantial and may warrant immediate attention.
- In the case of separations, an index above 120 indicates a substantial disparity (as numbers higher than 100 indicate more instances of separation than what would be expected for that group if separations were randomly distributed across groups).

In a few instances throughout our analyses, we found substantial disparities for men and non-Hispanic white workers.

Rounding in the reported numbers. The percentages shown in the following tables are shown rounded to the nearest tenth of a percent. The calculations in the table use non-rounded percentage. Therefore, some of the totals may not add exactly to 100.0 percent.

This also explains why disparity indices shown in the tables might be slightly different from what would be calculated using the rounded percentages reported in each table.

D. Quantitative Workforce Analysis — Workforce results

Snapshot of Employees of People of Color and Women at the City

People of color represented about 29 percent of employees in the 2021 through 2024 study period. African American workers represented about 69 percent of the people of color working at the City.

About one-fourth of employees were women. Most of the women working at the City were white (67%).

D-1. City workers, by race, ethnicity and gender, 2021–2024

All EEO groups	Percent of employees
Race/ethnicity	
African American	20.2 %
Asian American	0.8
Hispanic American	6.5
American Indian	1.2
Total people of color	28.7 %
Non-Hispanic white	71.3
Total	100.0 %
Gender	
Women	23.6 %
Minority female	7.9
White female	15.7
Men	76.4 %
Minority male	20.8
White male	55.6

Note: Excludes temporary employees and elected officials.

Source: City employee data.

D. Quantitative Workforce Analysis — Workforce results

Keen Independent compared the representation of gender and racial groups in City’s jobs to the local labor pool.

Initial findings analyzed all EEO-4 job categories and examined representation within each job category in detail on the following pages of this appendix.

The City should be cautious when interpreting results, as some of the job categories have a small total number of employees and some of the racial and ethnic groups comprise a small share of the local workforce.

Workforce Results

Keen Independent’s analysis of the City’s workforce across all EEO-4 job categories showed the following:

- The share of City jobs held by Asian American workers was less than what would be expected given the mix of jobs and available labor pool (disparity index of 73).
- There was substantial underrepresentation of American Indian workers (1.2%) compared to what might be expected given the composition of the labor force (2.8%).
- Representation of women was substantially below what would be expected based on labor pool availability (disparity index of 77). However, a disparity was only found for white women.

The following pages further explore the types of City jobs where these disparities appear.

D-2. Workers in City’s workforce (all EEO-4 job categories), 2021–2024

	(a)	(b)	(c)	(d)
All EEO groups	Employees	Percent of employees	Availability	Disparity index (b/c)
Race/ethnicity				
African American	1,933	20.2 %	5.2 %	389
Asian American	81	0.8	1.2	73
Hispanic American	618	6.5	5.4	119
American Indian	110	1.2	2.8	41
Total people of color	2,742	28.7 %	14.6 %	197
Non-Hispanic white	6,819	71.3	85.4	83
Total	9,561	100.0 %	100.0 %	
Gender				
Women	2,254	23.6 %	30.7 %	77
Minority female	754	7.9	5.9	133
White female	1,500	15.7	24.7	64
Men	7,307	76.4 %	69.3	110
Minority male	1,988	20.8	8.6	241
White male	5,319	55.6	60.7	92

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Officials and Administrators (1)

Keen Independent compared the share of women and workers of color to availability measures for the Officials and Administrators category. (It is “category 1” of public sector jobs when preparing EEO-4 reports.)

- Overall, people of color represented 32 percent of the City’s employees in these jobs from 2021 through 2024, higher than what would be expected based on labor availability (8%). There were also more women holding these City jobs than expected from the availability analysis.
- Relatively few of these jobs were held by Asian Americans during the study period. The disparity shown in Figure D-3 for Asian Americans should be interpreted with caution because of the very small numbers for Asian Americans for both the share of jobs and the representation in the local labor market.

The issue of comparing very small numbers arises throughout this analysis for both Asian American and American Indian employees. We note this here and do not repeat it in the discussion of each table.

D-3. City’s workers in Officials and Administrator (1) jobs, 2021–2024

Officials and administrators	(a) Employees	(b) Percent of employees	(c) Availability	(d) Disparity index (b/c)
Race/ethnicity				
African American	122	25.8 %	2.0 %	1309
Asian American	2	0.4	1.1	40
Hispanic American	18	3.8	4.1	93
American Indian	11	2.3	1.0	230
Total people of color	153	32.3 %	8.1 %	397
Non-Hispanic white	320	67.7	91.9	74
Total	473	100.0 %	100.0 %	
Gender				
Women	174	36.8 %	27.9 %	132
Minority female	63	13.3	5.0	268
White female	111	23.5	22.9	102
Men	299	63.2 %	72.1 %	88
Minority male	90	19.0	3.2	599
White male	209	44.2	68.9	64

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Professionals (2)

Keen Independent compared the share of workers of color and women to availability measures for the City’s Professionals workforce. (It is category 2 in the City’s EEO-4 reports.)

There were no overall disparities for women or people of color; however, the share of jobs held by white women was below what might be expected from the availability analysis. This result is found for other categories of City jobs, as shown in the tables in the following pages.

D-4. City workers in Professional (2) jobs, 2021–2024

Professionals	(a) Employees	(b) Percent of employees	(c) Availability	(d) Disparity index (b/c)
Race/ethnicity				
African American	217	13.0 %	2.2 %	604
Asian American	29	1.7	0.2	859
Hispanic American	99	5.9	1.7	355
American Indian	15	0.9	0.5	183
Total people of color	360	21.6 %	4.5 %	478
Non-Hispanic white	1,309	78.4	95.5	82
Total	1,669	100.0 %	100.0 %	
Gender				
Women	424	25.4 %	24.4 %	104
Minority female	159	9.5	2.8	340
White female	265	15.9	21.6	73
Men	1,245	74.6 %	75.6 %	99
Minority male	201	12.0	1.7	702
White male	1,044	62.6	73.9	85

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Technicians (3)

Keen Independent compared the share of women workers and workers of color to availability measures for the City’s Technicians workforce. (It is category 3 in the City’s EEO-4 reports.)

- Representation of women was substantially below what might be expected given the composition of the labor pool. However, there was no disparity in employment of women of color.
- There was a substantial disparity between employment and availability of Asian American workers (disparity index of 40), Hispanic American workers (disparity index of 57) and American Indian employees (disparity index of 24).

D-5. City workers in Technician (3) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Technicians	Employees	Percent of employees	Availability	Disparity index (b/c)
Race/ethnicity				
African American	65	15.9 %	5.8 %	273
Asian American	1	0.2	0.4	64
Hispanic American	20	4.9	8.5	57
American Indian	4	1.0	4.0	24
Total people of color	90	22.0 %	18.7 %	117
Non-Hispanic white	320	78.0	81.3	96
Total	410	100.0 %	100.0 %	
Gender				
Women	75	18.3 %	29.1 %	63
Minority female	30	7.3	7.1	103
White female	45	11.0	22.0	50
Men	335	81.7 %	70.9 %	115
Minority male	60	14.6	11.6	126
White male	275	67.1	59.3	113

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Protective Service Workers (4)

Keen Independent compared the share of workers of color and women to availability of measures for the City’s Protective Service workforce. (It is category 4 in the City’s EEO-4 reports.)

- Overall, people of color represented 25 percent of the City’s employees in these jobs from 2021 through 2024, higher than what would be expected based on availability in the local labor market (13%).
- There was no substantial disparity in employment of women overall, but the share of jobs held by white women was lower than what might be expected given the composition of the labor market.

D-6. City workers in Protective Service (4) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Protective service workers	Employees	Percent of employees	Availability	Disparity index (b/c)
Race/ethnicity				
African American	499	14.3 %	2.2 %	636
Asian American	35	1.0	1.8	56
Hispanic American	291	8.3	5.5	152
American Indian	35	1.0	3.5	29
Total people of color	860	24.6 %	13.0 %	189
Non-Hispanic white	2,640	75.4	87.0	87
Total	3,500	100.0 %	100.0 %	
Gender				
Women	535	15.3 %	18.1 %	85
Minority female	146	4.2	4.1	103
White female	389	11.1	14.0	79
Men	2,965	84.7	81.9 %	103
Minority male	714	20.4	8.9	228
White male	2,251	64.3	73.0	88

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Paraprofessionals (5)

Keen Independent compared the share of workers of color and women to availability measures for City Paraprofessionals workforce. (It is category 5 in the City’s EEO-4 reports.)

Overall, people of color represented 34 percent of the City’s employees in such jobs from 2021 through 2024, higher than what would be expected based on labor availability (16%).

Keen Independent’s analysis of the City’s EEO-4 workforce by race and gender group found the following:

- Substantial disparity in employment and availability of Hispanic American workers (disparity index of 48).
- No representation of Asian American workers on paraprofessional workers, consistent with the expected availability.
- No disparity for women overall but underrepresentation of white women in these jobs.

D-7. City workers in Paraprofessional (5) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Paraprofessionals	Employees	Percent of employees	Availability	Disparity index (b/c)
Race/ethnicity				
African American	48	24.9 %	4.5 %	549
Asian American	0	0.0	0.0	--
Hispanic American	9	4.7	9.6	48
American Indian	9	4.7	2.2	210
Total people of color	66	34.2 %	16.4 %	209
Non-Hispanic white	127	65.8	83.6	79
Total	193	100.0 %	100.0 %	
Gender				
Women	156	80.8 %	78.5 %	103
Minority female	54	28.0	10.4	270
White female	102	52.8	68.2	78
Men	37	19.2 %	21.5 %	89
Minority male	12	6.2	6.0	103
White male	25	13.0	15.4	84

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Administrative Support Workers (6)

Keen Independent compared the share of workers of color and women to availability measures for City Administrative Support workforce. (It is category 6 in the City’s EEO-4 reports.)

One-third of City Administrative Support positions for 2021–2024 were held by people of color, above what might be expected from the availability analysis.

- More than 90 percent of these jobs were held by women, about what would be expected from the availability analysis. A smaller share of jobs was held by white women than expected from analysis of the local labor market.

D-8. City workers in Administrative Support (6) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Administrative support	Employees	Percent of employees	Availability	Disparity index (b/c)
Race/ethnicity				
African American	213	26.8 %	3.2 %	829
Asian American	2	0.3	0.2	167
Hispanic American	48	6.0	2.0	297
American Indian	6	0.8	0.8	91
Total people of color	269	33.9 %	6.3 %	542
Non-Hispanic white	525	66.1	93.7	71
Total	794	100.0 %	100.0 %	
Gender				
Women	720	90.7 %	94.7 %	96
Minority female	250	31.5	6.0	526
White female	470	59.2	88.7	67
Men	74	9.3 %	5.3 %	177
Minority male	19	2.4	0.3	919
White male	55	6.9	5.0	138

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Skilled Craft Workers (7)

Keen Independent compared the share of workers of color and women to availability measures for City Skilled Craft workforce. (It is category 7 in the City’s EEO-4 reports.)

- Representation of workers of color in Skilled Craft positions exceeded what would be expected from the availability analysis.
- Only 6 percent of these jobs were held by women, somewhat below what might be expected from analyzing the pool of local workers. There was no disparity for women of color, however.

D-9. City workers in Skilled Craft (7) jobs, 2021–2024

Skilled craft	(a) Employees	(b) Percent of employees	(c) Availability	(d) Disparity index (b/c)
Race/ethnicity				
African American	299	21.5 %	4.5 %	483
Asian American	8	0.6	0.8	76
Hispanic American	85	6.1	3.0	205
American Indian	14	1.0	1.7	60
Total people of color	406	29.2 %	9.9 %	296
Non-Hispanic white	984	70.8	90.1	79
Total	1,390	100.0 %	100.0 %	
Gender				
Women	84	6.0 %	8.2 %	74
Minority female	22	1.6	0.7	242
White female	62	4.5	7.5	59
Men	1,306	94.0 %	91.8 %	102
Minority male	384	27.6	9.2	300
White male	922	66.3	82.6	80

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Service Maintenance Workers (8)

Keen Independent compared the share of workers of color and women to availability measures for the EEO-4 job category Service Maintenance. (It is category 8 in the City’s EEO-4 reports.)

Overall, people of color represented 48 percent of the City’s employees in EEO-8 jobs from 2021 through 2024, higher than what would be expected based on labor availability (17%).

Keen Independent’s analysis of the City’s EEO-8 workforce by race and gender group found the following:

- Substantial disparity in employment and availability of Asian American workers (disparity index of 52), Hispanic American workers (disparity index of 74) and American Indian workers (disparity index of 51). (Note that in some cases, one is comparing very small numbers.)
- Representation of women was about what might be expected given the composition of the labor availability.

D-10. City workers in Service Maintenance (8) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Service maintenance	Employees	Percent of employees	Availability	Disparity index (b/c)
Race/ethnicity				
African American	470	41.5 %	8.0 %	517
Asian American	4	0.4	0.7	52
Hispanic American	48	4.2	5.7	74
American Indian	16	1.4	2.8	51
Total people of color	538	47.5 %	17.2 %	277
Non-Hispanic white	594	52.5	82.8	63
Total	1,132	100.0 %	100.0 %	
Gender				
Women	86	7.6 %	7.1 %	107
Minority female	30	2.7	2.3	113
White female	56	4.9	4.7	105
Men	1,046	92.4 %	92.9 %	99
Minority male	508	44.9	14.8	303
White male	538	47.5	78.1	61

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Workforce results

Summary Substantial Workforce Disparities by EEO-4 Groups

Figure D-11 shows whether there were substantial disparities in workforce representation of different groups by EEO group. The first two columns, African Americans and other people of color, are for men and women combined, and the last column is for all women.

There were substantial disparities in the representation of other people of color (Asian Americans, Hispanic Americans and American Indians, combined) with what might be expected in Technicians, Paraprofessionals and Service Maintenance jobs.

Representation of white women was substantially lower than what might be expected given the composition of the labor availability across all EEO-4 groups.

There were substantial disparities between employment and availability of women in Technicians and Skilled Craft jobs. The disparities were specifically related to representation of white women among City employees in these jobs compared to availability in the local labor pool.

Figure D-11 presents results for a snapshot in time (2021–2024). The hiring and separations analyses that follow further explore how any disparities might have developed.

D-11. Substantial disparities in workforces, by EEO-4 group, 2021–2024

EEO Group	African Americans	Other people of color	Women
All			Yes
1 Officials-Administrators			
2 Professionals			
3 Technicians		Yes	Yes
4 Protective Services			
5 Paraprofessionals		Yes	
6 Administrative Support			
7 Skilled Craft Workers			Yes
8 Service-Maintenance		Yes	

Note: Column (d) scores below 80 (highlighted) are substantial disparities. Other people of color include Asian Americans, Hispanic Americans and American Indians.

Source: City of Toledo employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Snapshot of Hiring of People of Color and Women at the City

People of color represented about 38 percent of employees hired in the 2021 through 2024 study period (compared to 29% of current workers). African American workers represented about 71 percent of the people of color hired.

About one-fourth of employees were women, similar to the share of current workers who were women. More than one-half of the women hired during the study period were white females.

D-12. City hires, by race, ethnicity and gender, 2021–2024

All EEO groups	Percent of hires
Race/ethnicity	
African American	27.3 %
Asian American	1.5
Hispanic American	8.4
American Indian	1.1
Total people of color	38.3 %
Non-Hispanic white	61.7
Total	100.0 %
Gender	
Women	26.5 %
Minority female	10.2
White female	16.3
Men	73.5 %
Minority male	28.0
White male	45.4

Note: Excludes temporary employees and elected officials.

Source: City employee data.

D. Quantitative Workforce Analysis — Hiring results

Keen Independent compared demographic characteristics of employees hired for all City jobs from 2021 through 2024 with the characteristics of workers available for those jobs living in Lucas and Wood counties (based on ACS data on occupations for those local residents). Initial findings analyzed all jobs and a closer analysis of combinations of certain job categories appears in the following pages.

As with overall workforce results, the City should be cautious in interpreting results, as some of the job categories have a small total number of hires and some of the racial and ethnic groups comprise of a small share of the local workforce (especially true for Asian Americans and American Indians).

Hiring Results

Keen Independent’s analysis of the City’s 2021 through 2024 hiring across all EEO-4 job categories showed the following:

- There were substantial disparities in hiring for American Indian workers. The percentage of hires (1%) was below what might be expected given the availability in the local marketplace.
- The number of women hired by the City from 2021 through 2024 matched what might be expected from the availability analysis. The percentage of hires who were white women (16%) was substantially lower than the percentage of women in those jobs in the labor market (21%).

D-13. City hiring of workers, 2021–2024

	(a)	(b)	(c)	(d)
All EEO groups	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	320	27.3 %	5.7 %	480
Asian American	18	1.5	1.1	136
Hispanic American	98	8.4	5.6	148
American Indian	13	1.1	3.1	36
Total people of color	449	38.3 %	15.5 %	247
Non-Hispanic white	724	61.7	84.5	73
Total	1,173	100.0 %	100.0 %	
Gender				
Women	311	26.5 %	27.1 %	98
Minority female	120	10.2	5.8	178
White female	191	16.3	21.4	76
Men	862	73.5 %	72.9 %	101
Minority male	329	28.0	9.8	287
White male	533	45.4	63.1	72

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Officials and Administrators (1)

Keen Independent compared the demographic characteristics of employees hired for Officials and Administrators jobs from 2021 through 2024 with the characteristics of workers available for those jobs within Lucas and Wood counties.

The percentage of hires of people of color (31%) exceeded what might be expected from the availability analysis (26%).

Keen Independent’s analysis of the City’s hiring by race and gender group found the following:

- No people identifying as Hispanic American or American Indian were hired by the City for these types of jobs from 2021 through 2024.
- The proportion of hires for these positions who were women (49%) was higher than might be expected given availability (32%) in the local market.

D-14. City hiring of workers for Officials and Administrators (1) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Officials and administrators	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	12	26.7 %	2.5 %	1069
Asian American	2	4.4	0.9	495
Hispanic American	0	0.0	4.8	0
American Indian	0	0.0	1.1	0
Total people of color	14	31.1 %	9.3 %	333
Non-Hispanic white	31	68.9	90.7	76
Total	45	100.0 %	100.0 %	
Gender				
Women	22	48.9 %	31.8 %	154
Minority female	6	13.3	6.1	219
White female	16	35.6	25.7	138
Men	23	51.1 %	68.2 %	75
Minority male	8	17.8	3.2	547
White male	15	33.3	65.0	51

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Professionals (2)

Keen Independent also examined employees hired for Professionals (from 2021 through 2024).

There was no evidence of racial disparities in the 2021–2024 Administrative Support EEO-6 workforce. The percentage of hires of people of color (52%) was higher than the share of potential hires (6%).

Keen Independent’s analysis of the City’s EEO-1 hiring by race and gender group found the following:

- Overall, women were underrepresented in hires for Professional positions, but not at a level indicating a substantial disparity (disparity index of 92).
- The proportion of hires who were white women (30%) was substantially below what might be expected given availability (62%) in the local market.

D-15. City hiring of workers for Professionals (2) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Professionals	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	45	38.8 %	1.8 %	2109
Asian American	5	4.3	0.3	1701
Hispanic American	8	6.9	2.8	244
American Indian	2	1.7	0.9	193
Total people of color	60	51.7 %	5.8 %	890
Non-Hispanic white	56	48.3	94.2	51
Total	116	100.0 %	100.0 %	
Gender				
Women	69	59.5 %	64.9 %	92
Minority female	34	29.3	3.3	883
White female	35	30.2	61.6	49
Men	47	40.5 %	35.1 %	116
Minority male	26	22.4	2.5	900
White male	21	18.1	32.6	56

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Technicians (3)

Keen Independent also examined employees hired for Technicians jobs from 2021 through 2024.

There was evidence of disparities in hiring for people of color for Technicians. The percentage of hires of people of color (17%) was higher than the share of potential hires (26%).

Keen Independent’s analysis of the City’s EEO-3 hiring by race and gender group found the following:

- There were no hires of Hispanic American workers in the Technician positions. The proportion of hires of American Indian workers (4%) was below what was expected from the availability analysis (8%).
- Women were underrepresented in Technicians hires. The proportion of hires who were women (17%) was substantially below what might be expected given availability (27%) in the local market.

D-16. City hiring of Technicians (3) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Technicians	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	6	11.5 %	7.6 %	151
Asian American	1	1.9	1.4	142
Hispanic American	0	0.0	9.0	0
American Indian	2	3.8	7.9	49
Total people of color	9	17.3 %	26.0 %	67
Non-Hispanic white	43	82.7	74.0	112
Total	52	100.0 %	100.0 %	
Gender				
Women	9	17.3 %	27.1 %	64
Minority female	2	3.8	5.8	67
White female	7	13.5	21.4	63
Men	43	82.7 %	72.9 %	113
Minority male	7	13.5	9.8	138
White male	36	69.2	63.1	110

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Protective Services (4)

Keen Independent compared the demographic characteristics of employees hired for Protective Service jobs from 2021 through 2024.

- The percentage of hires of people of color (36%) exceeded the share of potential hires (10%).
- The proportion of hires who were women (21%) was higher than what might be expected given availability (10%) in the local market.

D-17. City hiring of Protective Services (4) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Protective service workers	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	114	22.5 %	1.7 %	1322
Asian American	8	1.6	1.2	127
Hispanic American	55	10.8	3.8	288
American Indian	7	1.4	3.2	43
Total people of color	184	36.3 %	9.9 %	365
Non-Hispanic white	323	63.7	90.1	71
Total	507	100.0 %	100.0 %	
Gender				
Women	108	21.3 %	10.1 %	211
Minority female	35	6.9	2.6	261
White female	73	14.4	7.4	193
Men	399	78.7 %	89.9 %	88
Minority male	149	29.4	7.3	403
White male	250	49.3	82.6	60

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Paraprofessionals (5)

Keen Independent also examined employees hired for Paraprofessional jobs from 2021 through 2024. The small number of hires over this time period (19 hires) limits the analysis.

- There was evidence of disparities in hiring for people of color for Paraprofessionals. The percentage of hires of people of color (37%) exceeded the share of potential hires (26%).
- The proportion of hires who were women (79%) was about what might be expected given availability in the local market.

D-18. City hiring in Paraprofessionals (5) jobs, 2021–2024

Paraprofessionals	(a) Hires	(b) Percent of hires	(c) Availability	(d) Disparity index (b/c)
Race/ethnicity				
African American	4	21.1 %	3.2 %	666
Asian American	0	0.0	0.0	--
Hispanic American	2	10.5	21.0	50
American Indian	1	5.3	1.9	276
Total people of color	7	36.8 %	26.0 %	141
Non-Hispanic white	12	63.2	74.0	85
Total	19	100.0 %	100.0 %	
Gender				
Women	15	78.9 %	79.5 %	99
Minority female	6	31.6	21.6	146
White female	9	47.4	57.9	82
Men	4	21.1 %	20.5 %	103
Minority male	1	5.3	4.4	118
White male	3	15.8	16.1	98

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Administrative Support (6)

Keen Independent also examined employees hired for Administrative Support jobs from 2021 through 2024.

- The percentage of hires of people of color (37%) was higher than the share of potential hires (9%).
- Even though 82 percent of the people hired for these jobs were women, this is in the range of what one might expect from the availability analysis. However, the proportion of hires who were white women (48%) was substantially below what might be expected given availability (87%) in the local market.

D-19. City hiring of workers in Administrative Support (6) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Administrative support	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	22	26.8 %	4.4 %	604
Asian American	2	2.4	0.3	808
Hispanic American	6	7.3	3.5	208
American Indian	0	0.0	1.1	0
Total people of color	30	36.6 %	9.3 %	393
Non-Hispanic white	52	63.4	90.7	70
Total	82	100.0 %	100.0 %	
Gender				
Women	67	81.7 %	95.6 %	85
Minority female	28	34.1	8.9	383
White female	39	47.6	86.7	55
Men	15	18.3 %	4.4 %	414
Minority male	2	2.4	0.4	618
White male	13	15.9	4.0	394

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis

D. Quantitative Workforce Analysis — Hiring results

Skilled Craft (7)

Keen Independent also examined employees hired for Skilled Craft jobs from 2021 through 2024.

- The percentage of hires of people of color (24%) exceeded the share of potential hires (7%).
- It appears that only one of the hires in Skilled Craft positions went to a woman. Even those women make up only 6 percent of the local market area workers available for these jobs, the share of Skilled Craft hires going to women was smaller than expected.

D-20. City hiring of workers in Skilled Craft (7) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Skilled craft	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	22	17.2 %	3.0 %	574
Asian American	0	0.0	0.8	0
Hispanic American	8	6.3	2.0	317
American Indian	1	0.8	1.6	49
Total people of color	31	24.2 %	7.3 %	331
Non-Hispanic white	97	75.8	92.7	82
Total	128	100.0 %	100.0 %	
Gender				
Women	1	0.8 %	6.0 %	13
Minority female	0	0.0	0.2	0
White female	1	0.8	5.8	13
Men	127	99.2 %	94.0 %	106
Minority male	31	24.2	7.1	340
White male	96	75.0	86.9	86

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Service Maintenance (8)

Keen Independent compared the demographic characteristics of employees hired for Service Maintenance jobs from 2021 through 2024.

- The percentage of hires of people of color for Service Maintenance jobs (51%) exceeded the share that might be anticipated from the availability analysis (15%).
- The percentage of hires of women (9%) exceeded what might be expected from the analysis of availability of local residents for these jobs (5%).

D-21. City hiring of workers in Service Maintenance (8) jobs, 2021–2024

	(a)	(b)	(c)	(d)
Service maintenance	Hires	Percent of hires	Availability	Disparity index (b/c)
Race/ethnicity				
African American	95	42.4 %	6.5 %	656
Asian American	0	0.0	0.7	0
Hispanic American	19	8.5	5.0	169
American Indian	0	0.0	2.7	0
Total people of color	114	50.9 %	14.8 %	343
Non-Hispanic white	110	49.1	85.2	58
Total	224	100.0 %	100.0 %	
Gender				
Women	20	8.9 %	5.0 %	177
Minority female	9	4.0	1.7	239
White female	11	4.9	3.4	146
Men	204	91.1 %	95.0 %	96
Minority male	105	46.9	13.2	356
White male	99	44.2	81.8	54

Note: Column (d) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Hiring results

Hiring by EEO-4 Groups

Figure D-22 shows whether there were substantial disparities in hirings by EEO group. The first two columns, African Americans and other people of color, are for men and women combined, and the last column is for all women.

- There were substantial disparities in the hiring of people of color other than African Americans (Asian Americans, Hispanic Americans and American Indians, combined) in Officials-Administrators, Technicians and Paraprofessionals job categories for 2011 through 2024.
- Women comprised a substantially lower portion of City hires than expected for Technicians positions and Skilled Craft jobs.

D-22. Substantial disparities in hirings, by EEO-4 group, 2021–2024

EEO Group	African Americans	Other people of color	Women
All			
1 Officials-Administrators		Yes	
2 Professionals			
3 Technicians		Yes	Yes
4 Protective Services			
5 Paraprofessionals		Yes	
6 Administrative Support			
7 Skilled Craft Workers			Yes
8 Service-Maintenance			

Note: Column (d) scores below 80 (highlighted) are substantial disparities. Other people of color include Asian Americans, Hispanic Americans and American Indians.

Source: City of Toledo employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Promotions results

Keen Independent analyzed the demographic characteristics of City of Toledo employees promoted from 2021 through 2024, after controlling for job category. This analysis compared the number of promotions of individuals in job titles with benchmark rates for all City employees in those job titles.

All Promotions

Keen Independent’s analysis of the City’s promotions across all EEO-4 job categories showed the following:

- The promotion of people of color (0.134 promotions per worker during this time period) about what Keen Independent calculated as the expected rate (0.141).
- The promotion rate of Asian Americans and American Indians workers was substantially lower than the estimated rate, but this could be explained by random chance in promotions given the relatively small number of Asian American and American Indian employees at the City.
- There was no overall disparity in rates of promotion of women after controlling for the mix of jobs held by women (disparity index of 106). Promotion rates for women of color and white women were the same.

D-23. Promotions for City workers in all EEO-4 jobs, 2021–2024

All EEO groups	(a) Promotions	(b) Average number of employees	(c) Promotions per employee (a/b)	(d) Benchmark	(e) Disparity index (c/d)
Race/ethnicity					
African American	69	483	0.143	0.141	101
Asian American	2	20	0.099	0.142	70
Hispanic American	18	155	0.117	0.141	83
American Indian	3	28	0.109	0.140	78
Total people of color	92	686	0.134	0.141	95
Non-Hispanic white	244	1705	0.143	0.140	102
Total	336	2390	0.141		
Gender					
Women	84	564	0.149	0.141	106
Minority female	28	189	0.149	0.141	105
White female	56	375	0.149	0.141	106
Men	252	1827	0.138	0.141	98
Minority male	64	497	0.129	0.141	91
White male	188	1330	0.141	0.140	101

Note: Column (e) scores below 80 (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Promotions results

Promotions by EEO Group

Figure D-24 shows whether there were substantial disparities in promotions by EEO group. The first two columns, African Americans and other people of color, are for men and women combined, and the last column is for all women. Results by EEO-4 group must be viewed cautiously as some are based on relatively small number of workers of color or women holding those positions.

- There appeared to be lower than expected rates of promotions for individuals in Officials-Administrators jobs over the four-year study period, although relatively small numbers of workers limit interpretation of these results.
- A smaller number of promotions than expected went to Hispanic American and American Indian workers in the Professionals EEO-4 category. Again, the small number of workers in these demographic groups limits interpretation.
- There were only 19 women working in Technicians positions at the City during the study period (on average), so the small number of women in Technicians jobs limits the interpretation of the relatively low number of promotions for this group.
- There were fewer than expected promotions for women working in Protective Services jobs.
- For Skilled Craft positions, none of the 66 identified promotions were for women. The small number of women holding these jobs limits the interpretation of results.
- Workers of color in Service-Maintenance jobs were less likely than white workers to receive a promotion.

D-24. Substantial disparities in promotions, by EEO-4 group, 2021–2024

EEO Group	African Americans	Other people of color	Women
All			
1 Officials-Administrators	Yes	Yes	
2 Professionals		Yes	
3 Technicians			Yes
4 Protective Services			Yes
5 Paraprofessionals			
6 Administrative Support			
7 Skilled Craft Workers			Yes
8 Service-Maintenance	Yes		

Note: Column (d) scores below 80 (highlighted) are substantial disparities. Other people of color include Asian Americans, Hispanic Americans and American Indians.

Source: City of Toledo employee data, Census ACS 2019–2023 data for availability analysis.

D. Quantitative Workforce Analysis — Separation results

Keen Independent analyzed separation rates for City employees from 2021 through 2024. Note that indices of 120 or higher are considered substantial in separation analyses.

Similar to promotions analysis, the analysis compared the number of separations of individuals in job titles with benchmark rates for all City employees in those job titles. The study team also controlled for job tenure when developing the benchmarks for people of color and women for each EEO-4 group. Separations due to death, disability or disability reasons were not included in the analysis.

All Separations

Figure D-25 compares rates of separation with benchmarks of separations across all EEO-4 job categories. The two substantial disparities were for:

- African American workers (0.151 separations per employee compared to the expected rate of 0.125 separations per employee for this group); and
- White women (0.149 separations per employee compared to an expected rate of 0.122 for this group).

Further analysis indicated high rates of separation for African American workers in the Skilled Trades EEO-4 category.

More than one-half of the women separating from the City were in Administrative Support positions, which was also accounted for the most City jobs held by women. There was no meaningful difference in rates of separation for women and men in these jobs; however, the small number of men in these positions makes any comparison difficult.

The number of separations for other EEO-4 job categories was too small to provide meaningful comparisons by demographic group.

D-25. Separations for City workers in all EEO-4 jobs, 2021–2024

All EEO groups	(a) Separations	(b) Average number of employees	(c) Separations per employee (a/b)	(d) Benchmark	(e) Disparity index (c/d)
Race/ethnicity					
African American	73	483	0.151	0.125	121
Asian American	0	20	0.000	0.120	0
Hispanic American	15	155	0.097	0.123	79
American Indian	4	28	0.145	0.123	119
Total people of color	92	686	0.134	0.124	108
Non-Hispanic white	201	1705	0.118	0.122	97
Total	293	2390	0.123		
Gender					
Women	81	564	0.144	0.123	117
Minority female	25	189	0.133	0.123	108
White female	56	375	0.149	0.122	122
Men	212	1827	0.116	0.123	95
Minority male	67	497	0.135	0.125	108
White male	145	1330	0.109	0.122	90

Note: Separations exclude death, retirement and departure due to health reasons. Column (d) scores of 120 or higher (highlighted) are substantial disparities.

Source: City employee data, Census ACS 2019–2023 data for availability analysis.

APPENDIX E. Pay Equity Analysis

Keen Independent analyzed the City of Toledo’s employment data to determine whether there were wage disparities between demographic groups.

The Keen Independent study team collected information about City employee wages, positions and demographic characteristics.²⁰² The study team developed a disparity score summarizing deviation from the mean wage by position to analyze pay gaps that control for job title and year. The study team also developed regression models to estimate any pay gaps after further controlling for gender- and race-neutral factors available in City data, such as employee age.

In this appendix, the study team also considers whether opportunities for growth are equally accessible to all City employees (wage growth analysis). We also analyze whether women and people of color are sorted into lower-paying positions by examining the average pay for cohorts of new hires for each year (cohort analysis).

After presenting descriptive statistics, this appendix provides the following four analyses:

- Pay disparity analysis;
- Regression analysis;
- Wage growth analysis; and
- Gender concentration analysis.

²⁰² The Keen Independent study team completed demographic information for City employees in 2017–2020 data. Summary statistics for 2017 and 2024 in Appendix E may differ from pooled 2021–2024 analyses presented in Appendix E. The study team

performed sensitivity analyses and determined that the results of these analyses are not sensitive to the data selected for analysis.

E. Pay Equity Analysis — Descriptive statistics

Figure E-1 provides descriptive statistics for the employment and wage dataset for 2017–2024 that Keen Independent examined in this analysis. Appendix D includes additional information about City data. Note that the analysis does not include temporary employees.

Employee Demographics

Data from 2017 and 2024 represent the most recent period for which City employee information is available.

Gender and race. Figure E-1 shows the total number of unique employees at the City (about 2,500 and 2,600 in 2017 and 2024, respectively). The figure shows the number of employees who were female and male, further separated into women of color and all other women and men of color and all other men.²⁰³

E-1. City employee composition by gender and race, 2017–2024

	Number of employees		Share of employees	
	2017	2024	2017	2024
Overall				
All employees	2,475	2,572	100.0 %	100.0 %
Gender				
Women	586	613	23.7 %	23.8 %
Women of color	170	212	6.9	8.2
All other women	416	401	16.8	15.6
Men	1,889	1,959	76.3 %	76.2 %
Men of color	453	546	18.3	21.2
All other men	1,436	1,413	58.0	54.9
Race/ethnicity				
African American	479	539	19.4 %	21.0 %
Asian American	18	31	0.7	1.2
Hispanic American	109	173	4.4	6.7
American Indian	3	7	0.1	0.3
Two or more races	14	8	0.6	0.3
Total people of color	623	758	25.2 %	29.5 %
Non-Hispanic white	1,786	1,814	72.2 %	70.5 %
Race not provided	66	-	2.7	-
Total	2,475	2,572	100.0 %	100.0 %

Note: Totals may not add to 100.0 due to rounding.

Source: City employee data, 2017–2024.

²⁰³ Information on racial or ethnic identity was not available for about 3 percent of City employees in 2017. This rate steadily decreased to 0 percent in 2024. For certain

analyses, employees without race/ethnicity information were classified under “all other women” or “all other men.”

E. Pay Equity Analysis — Descriptive statistics

Age. Figure E-2 illustrates the composition of City employees by age group. The average City employee age was 47 in 2017 and 45 in 2024.

Time with the City. Figure E-2 also includes the distribution of City employees by the number of years since they were hired by the City.

Note that original hire date was not available for about 12 percent of employees in 2017 (but less than 1 percent in 2022).²⁰⁴ It is possible that shifts in tenure composition are due to more complete data in 2024.

E-2. City employee composition by age group and tenure, 2017–2024

	Number of employees		Share of employees	
	2017	2024	2017	2024
Age				
Under 25	45	81	1.8 %	3.1 %
25–34	444	565	17.9	22.0
35–44	512	668	20.7	26.0
45–54	849	619	34.3	24.1
55–64	557	536	22.5	20.8
65 and over	68	103	2.7	4.0
Total	2,475	2,572	100.0 %	100.0 %
Time with the City				
Under four years	737	678	29.8 %	26.4 %
Four to eight years	348	457	14.1	17.8
Eight years or more	1,390	1,437	56.2	55.9
Total	2,475	2,572	100.0 %	100.0 %

Note: Totals may not add to 100.0 due to rounding.

Source: City employee data, 2017–2024.

²⁰⁴ For these employees, the study team assigned a start date of January 1, 2016.

E. Pay Equity Analysis — Descriptive statistics

EEO category. The City’s employee composition by EEO category is illustrated in Figure E-3. Protective Service made up about one third of the City’s workforce in both 2017 and 2024.

Exempt status. Figure E-3 also includes the share of City employees classified as exempt. As a share of City employees overall, exempt employees grew from about 8 percent of the workforce in 2017 to about 10 percent of the workforce in 2024. The 2024 increase in force represents a 33 percent increase over the 2017 count.

Not included in Figure E-3 is the share of employees who were exempt, by gender. For the pooled 2017–2024 period, a much greater share of women were exempt (21.1%) relative to men (4.9%).

E-3. City employee composition by EEO category, 2017–2024

	Number of employees		Share of employees	
	2017	2024	2017	2024
EEO category				
Officials-Administrators	116	140	4.7 %	5.4 %
Professionals	413	446	16.7	17.3
Technician	98	109	4.0	4.2
Protective Service	876	919	35.4	35.7
Paraprofessional	42	55	1.7	2.1
Administrative Support	285	205	11.5	8.0
Skilled Craft	362	367	14.6	14.3
Service-Maintenance	283	331	11.4	12.9
Total	2,475	2,572	100.0 %	100.0 %
Exempt status				
Exempt	203	266	8.2 %	10.3 %
Non-exempt	2,272	2,306	91.8	89.7
Total	2,475	2,572	100.0 %	100.0 %

Note: Totals may not add to 100.0 due to rounding.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Descriptive statistics

Job title. Figure E-4 shows the number of employees by each job title for the pooled 2017–2024 data. The figure includes only the top twenty job titles for the pooled data, which account for about two thirds of City employees for the 2017–2024 period. Other job titles not listed in Figure E-4 each made up less than one percent of the total number of employees examined.

Figure E-4 also indicates the share of employees who were women for each of the largest twenty job titles (by number of employees). Some job titles have high concentrations of women (e.g., Clerk Specialist 1, Clerk Specialist 2 and Police Records Clerk) and others have high concentrations of men (e.g., Automotive Repair Technician, Watermain Repair Worker and Water Service Technician). As discussed later in this appendix, the hourly rates for highly gendered job titles did not indicate that women-concentrated roles were paid less on average than male-dominated roles.

As described below, job titles were critical when developing City employee pay disparity scores (see page 7).

E-4. Job title composition of City employees, 2017–2024

	Number of employees	Share of employees	Percent women
Police Officer	3,873	19.4 %	17.2 %
Fire Fighter	1,791	8.9	11.3
Fire Fighter/Paramedic	1,408	7.0	11.4
Police Sergeant	1,125	3.8	12.7
Fire Lieutenant	1,052	3.4	10.0
Clerk Specialist 2	987	2.9	92.3
Maintenance Worker 1	940	1.7	9.1
Watermain Repair Worker	830	1.5	1.0
Heavy Equipment Operator 2	702	1.5	7.0
Maintenance Worker 2	483	1.5	8.8
Sewer & Drainage Service Worker	466	1.4	2.4
Fire Captain	438	1.3	11.4
Police Records Clerk	369	1.3	97.3
Water Reclamation Operator	349	1.2	10.5
Automotive Repair Technician	345	1.2	0.0
Police Lieutenant	336	1.1	13.9
Utility Worker	327	1.1	5.5
Clerk Specialist 1	268	0.9	98.9
Heavy Equipment Operator	251	0.8	8.4
Water Service Technician	211	0.8	2.4
All other job titles	7,422	37.1	32.9
Total	19,981	100.0 %	

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Pay disparity analysis

Median Hourly Wages

The study team calculated the average (mean and median) pay for City employees overall, as well as by gender, race and EEO-4 job categories, as well as combinations of these variables. Average pay was also examined separately for exempt and non-exempt employees.

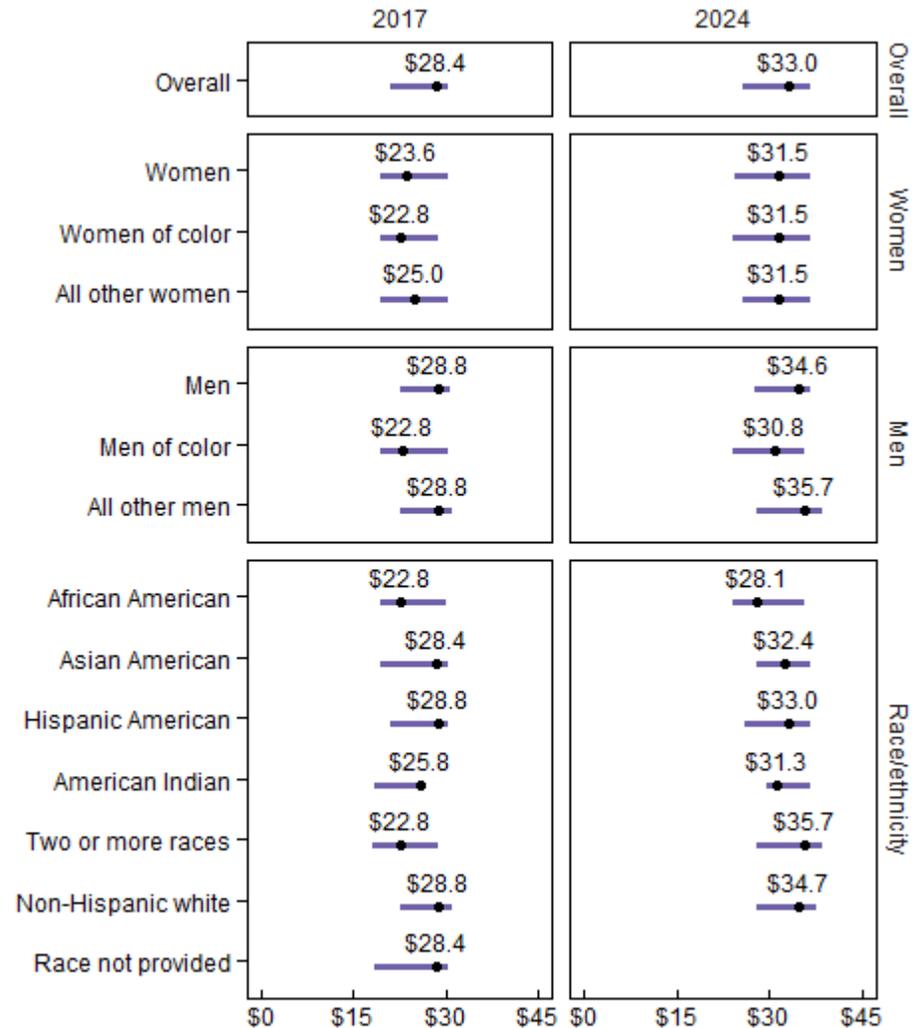
Figure E-5 shows the median hourly wage for City employees in 2017 and 2024. The purple bars indicate the interquartile range (the span from the 25th to the 75th percentile) for each group. For example, Figure E-5 indicates that, in 2024, the median hourly wage was \$33 and that one-half of City employees were paid between \$26 and \$37. One-quarter of City workers earned more per hour and one-quarter earned less.

For all City employees, the median hourly wage was about \$28.40 in 2017 and \$33.00 in 2024. Certain groups had lower median hourly wages, including:

- Women (\$23.60 in 2017 and \$31.50 in 2024). These differences were even wider for women of color in 2017;
- Men of color (\$22.80 in 2017 and \$30.80 in 2024);
- African Americans (\$22.80 in 2017 and \$28.10 in 2024);
- American Indians (\$25.8 in 2017 and \$31.30 in 2024);
- Employees identifying as two or more races (\$22.80 in 2017).

These average hourly wages do not control for factors such as age, title or tenure. As discussed later in this report, much of the observed differences in wages are explained by these gender- and race-neutral attributes.

E-5. Median hourly wages by group for City employees, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Pay disparity analysis

Pay Disparity Score

To accomplish this, the study team developed a pay disparity score to examine differences in hourly wages after accounting for the year of the wage data as well as the employee’s job title or occupation code (see Appendix D).

Scores were calculated by dividing an employee’s hourly wage by the average wage among white men for their job title, multiplied by 100.²⁰⁵ For example, a City employee making \$26 per hour in 2023 as a firefighter, which had a mean wage of \$33 among white men in 2023, would have a score of 79 ($26 \div 33 \times 100 = 78.8$). A score of 100 indicates that a City employee made exactly the same as white men did (on average) in the same job title in the same year.

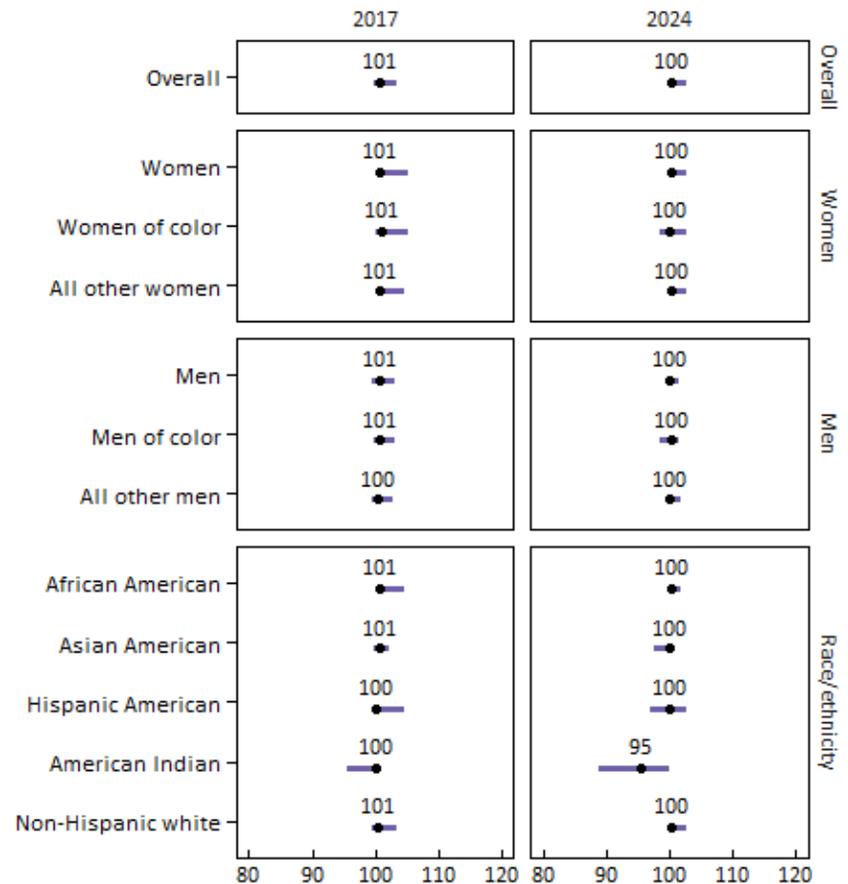
Score Distributions by Demographic Group

Figure E-6 shows the score median and interquartile range for each demographic group, by gender and race. Most of the results show disparity scores at or very near “100.”

The purple bars in Figure E-6 indicate the range of scores for employees within a job title (between the 25th and 75th percentile in the score distribution for that group). For most groups, the interquartile range spanned a score of 95 to 105, meaning that half of the observations for each group fell in this range. In other words, most employees earned within 5 percent of the median for that job title. There was no pattern of women earning less than men or workers of color earning less than white workers within the same job title.

²⁰⁵ A score could not be calculated for about 8 percent of the data, as there were too few men in certain job titles to determine a baseline wage. These job titles are examined in additional detail below.

E-6. Average pay disparity score by gender and race, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Pay disparity analysis

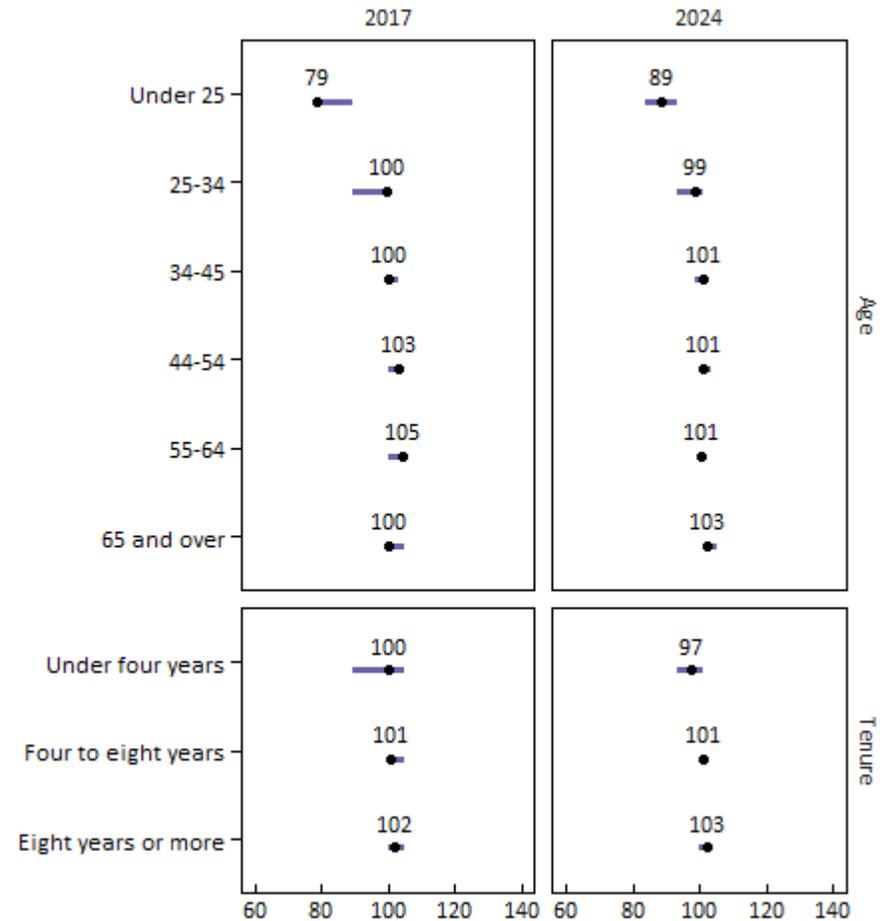
Score distribution by age group. Some of Figure E-7 includes the median and interquartile range score for women by age group. The results show that young women had a median score of 79, indicating that 50 percent of women in this age group had substantially lower hourly wages than white men in the same job title (of all ages). However, women in this age group had similar rates in pay to white men in this age group, so the disparity in wage may be due to years of work experience (at or outside the City) and not gender.

Employees who were 25 to 34 had a median score of 100, indicating parity between the hourly rate for these groups and for white men in the same job title. However, the interquartile range shows that 25 percent of these groups had disparity scores between 90 and 100 and another 25 percent below 90.

Score distribution by time with the City. Figure E-7 also includes the median and interquartile range of the disparity score for women by tenure group, or time with the City.

Newer female employees had a median score of 100 in 2017 and 97 in 2024. In 2017, female employees with less than four years with the City had an interquartile range between 90 and 105. The interquartile range reduced in 2024, ranging from 93 to 101.

E-7. Average pay disparity scores for women by age group and tenure, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Pay disparity analysis

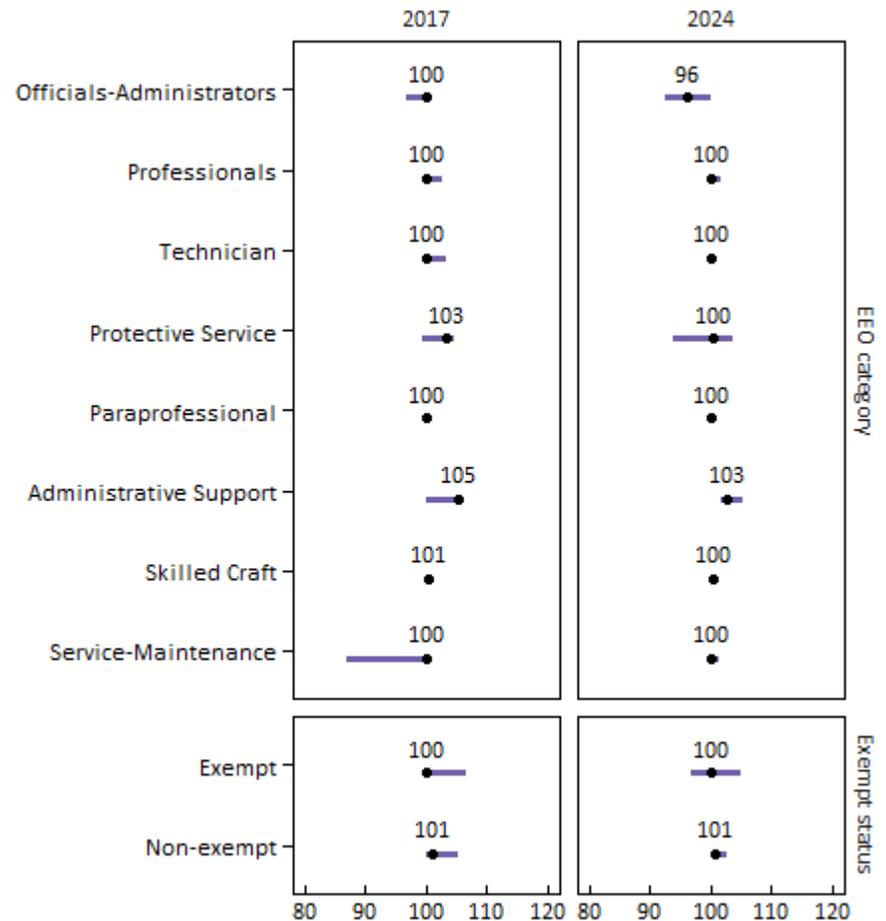
Score distribution by EEO category. Figure E-8 shows the disparity score distribution for women by EEO category.

On average, women had a disparity score at or near 100 for each EEO category, indicating parity in pay with white men with the same job title.

There was more skew in the score distribution for women in certain roles. For women in Service-Maintenance roles in 2017, the 25th percentile was 87, indicating that another 25 percent of women experience relatively more extreme pay disparities. For women in Protective Service roles in 2024 the 25th percentile was 94. For women in Officials-Administrators roles, the median score was 96 and the 25th percentile was 93.

Score distribution by exempt status. Figure E-8 also includes the disparity score distribution for women by exempt status. As shown, women overall had a disparity index of 100 or 101 regardless of exempt status.

E-8. Average score for women by EEO category and exempt status, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Pay disparity analysis

Score distribution by job title. Figure E-9 shows the disparity score median and interquartile range for women by job title for the top twenty job titles by count (all female City employees between 2017 and 2024, pooled).

Each of the job titles had a median score at or near 100, indicating pay equity with white men in the same job title. Women in the Manager-Administrative Services role had the lowest disparity score at 95.

Some job titles had greater variance in the score distribution. For example, the 25th percentile for women Fire Fighters was 85 (meaning 25 percent of women Fire Fighters have a score below 85).

The analysis of score distributions above control for job title and year. In the next section, the study team analyzes differences in average scores while controlling for other factors, such as age and tenure.

E-9. Average score for women by job title, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Regression analysis

Keen Independent ran a series of regression models using the disparity score described above. The purpose for these regressions is to estimate whether there is a significant impact of gender or race on the occupation-adjusted pay disparity index.

Methodology

Keen Independent performed regression analyses estimating the correlation between immutable employee characteristics (such as gender, race and ethnicity) and the disparity score.²⁰⁶ The study team statistically controlled for the following as explanatory variables:

- Gender;
- Race;
- Age;
- Job tenure;
- Department categories;
- Union status;
- EEO4 group; and
- Interactions between the variables above.

The study team used mixed effects models with year fixed effects and employee specific random-intercepts. Mixed effects models include “fixed effects” for observed variables, such as those listed to the left, as well as “random effects” for unobserved variables that may help explain any variance or disparity in pay (educational attainment, for example).

²⁰⁶ Regression analyses were conducted in R version 4.4.2 using the base *stats* package and the *lme4* package (version 1.1.37).

E. Pay Equity Analysis — Regression analysis

Results

Keen Independent began with a regression of score on gender and race variables in addition to year fixed effects and individual level random effects.²⁰⁷ The study team developed an additional six regressions, each adding a control from the list above. Figure E-10 presents the coefficients for the regression with the greatest model performance.²⁰⁸

The coefficient for women is not statistically significant in this model, meaning that there was no statistically significant effect of gender after controlling for certain other factors.

The coefficients for African American men and Asian American men were both negative and statistically significant. These coefficients suggest that, on average, African American men are paid about 1 percent less per hour than white men in the same position and Asian American men are paid about 2 percent less per hour. As these are very small differences, there could be other factors not included in the model that could explain the disparities.

This model includes employee age and age squared (represented as years since high school), as well as tenure with the City. These variables indicate that older employees and more tenured employees have higher score values. These variables also account for much more of the variance in the score value, relative to race and gender. For example, the disparity score is expected to increase by about 1 percentage point for each year since high school.

²⁰⁷ By including individual random intercepts, the model captures both the effects of the observed variables (as shown in Figure E-10) and personal differences not included in City data, such as education and work history. The study team did not find evidence that individual intercepts were higher for white men than for other groups.

E-10. Model coefficients estimating disparity scores for City employees, 2017–2024

Variable	Coefficient
Intercept	81.64 **
White women	0.39
African American women	0.02
Asian American women	2.89
Hispanic American women	-0.17
American Indian women	-2.13
African American men	-0.76 **
Asian American men	-2.42 *
Hispanic American men	-0.17
American Indian men	-2.13
Tenure	0.16 **
Years since high school	1.17 **
Years since high school (squared)	-0.02 **

Source: City employee data, 2017–2024.

The study team estimated additional models controlling for department, union status, exempt status and EEO categories. These variables did not improve model fit and did not materially alter the results in Figure E-10.

²⁰⁸ About 35 percent of the variance in the score value is explained by the coefficients in Figure E-10. Another 36 percent of the variance is explained by employee-level random intercepts in the model, which may account for educational attainment or other factors not included in City data.

E. Pay Equity Analysis — Wage growth analysis

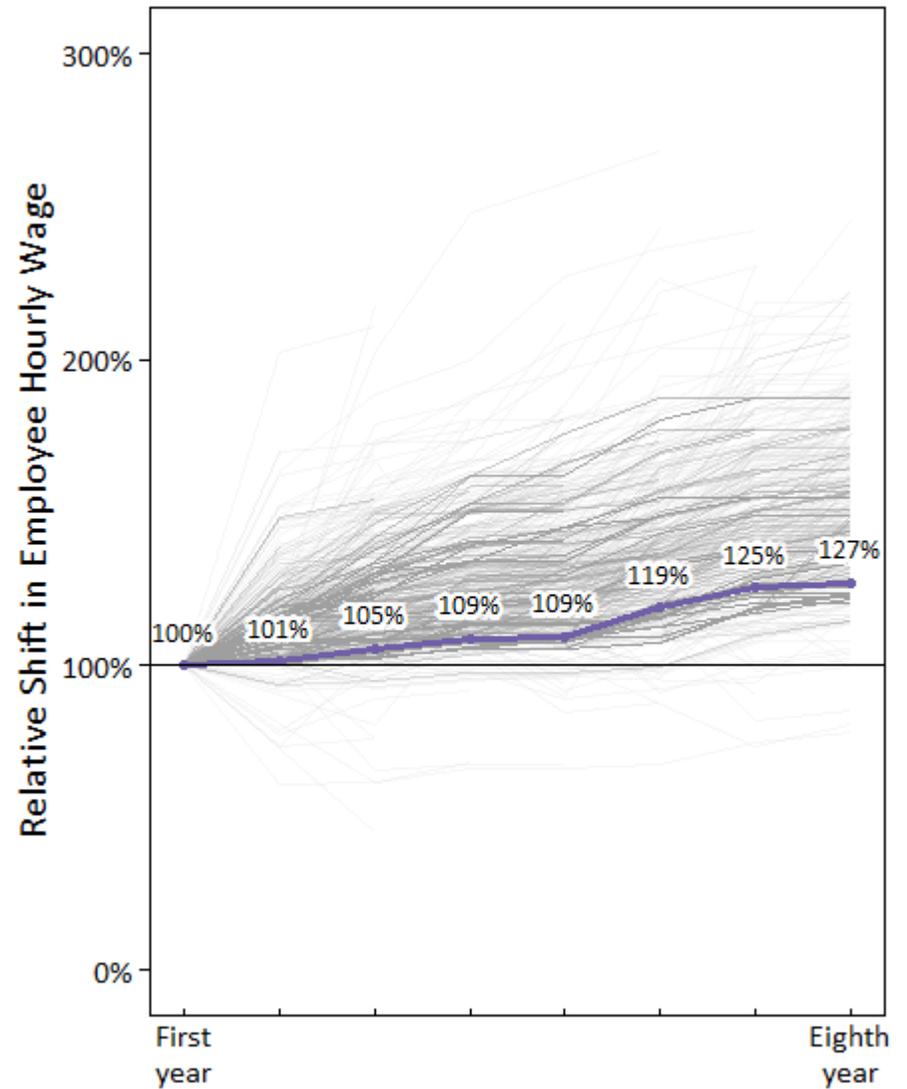
Keen Independent examined how each employee’s wages changed over the course of their career with the City, measured relative to their starting hourly rate. This wage growth analysis focuses on the magnitude of wage growth from an employee’s starting point, allowing for direct comparisons of career earnings trajectories across groups.

The analysis shows whether employees receive comparable percentage increases in pay over time, regardless of their initial wage. It captures all sources of wage progression, including step increases, merit raises, market adjustments, promotions and demotions. By examining relative wage growth, the wage growth analysis provides insight into equity in pay progression alongside overall pay levels and promotion outcomes.

Figure E-11 (right) illustrates the relative shift in wages over City employees’ tenure. Each gray line represents one of the 3,780 unique City employees in the pooled 2017–2024 employment data. The purple bold purple line indicates the median relative wage shift for all City employees. On average, wages increased to about 101 percent of individuals’ initial hourly rate after one year with the City, to about 109 percent after four years and to 127 percent after eight years.

The study team performed this wage growth analysis by gender and minority status. As shown in Figure E-12 on the following page, the average trajectory for wage growth for women and people of color closely align with those for non-minority men.

E-11. Relative change in individual City employee hourly rates, 2017–2024

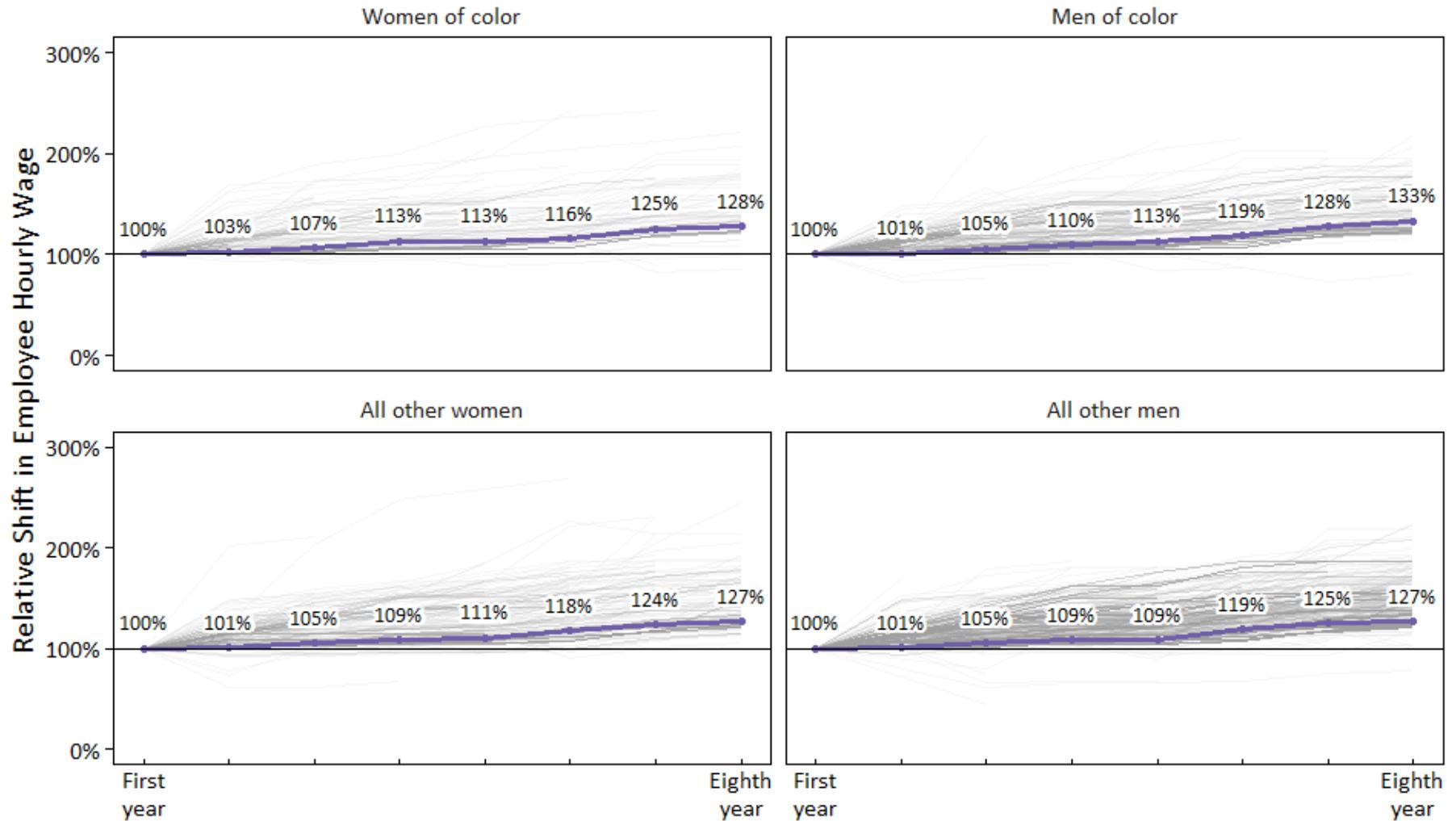


Note: The purple line indicates the median of relative wage shifts for individuals

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Wage growth analysis

E-12. Relative change in individual hourly rates by gender and minority status, 2017–2024



Note: The purple line indicates the median of relative wage shifts for individuals in each group.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Gender concentration analysis

In the disparity analyses discussed in this appendix, a disparity score could not be calculated for certain job titles where there were too few men holding those jobs to determine a baseline wage. Additionally, there were some job titles with no women. The disparity score results previously reported do not account for position sorting based on gender. For example, all of the employees working under the job title Clerk Specialist 1 in 2018 were women.

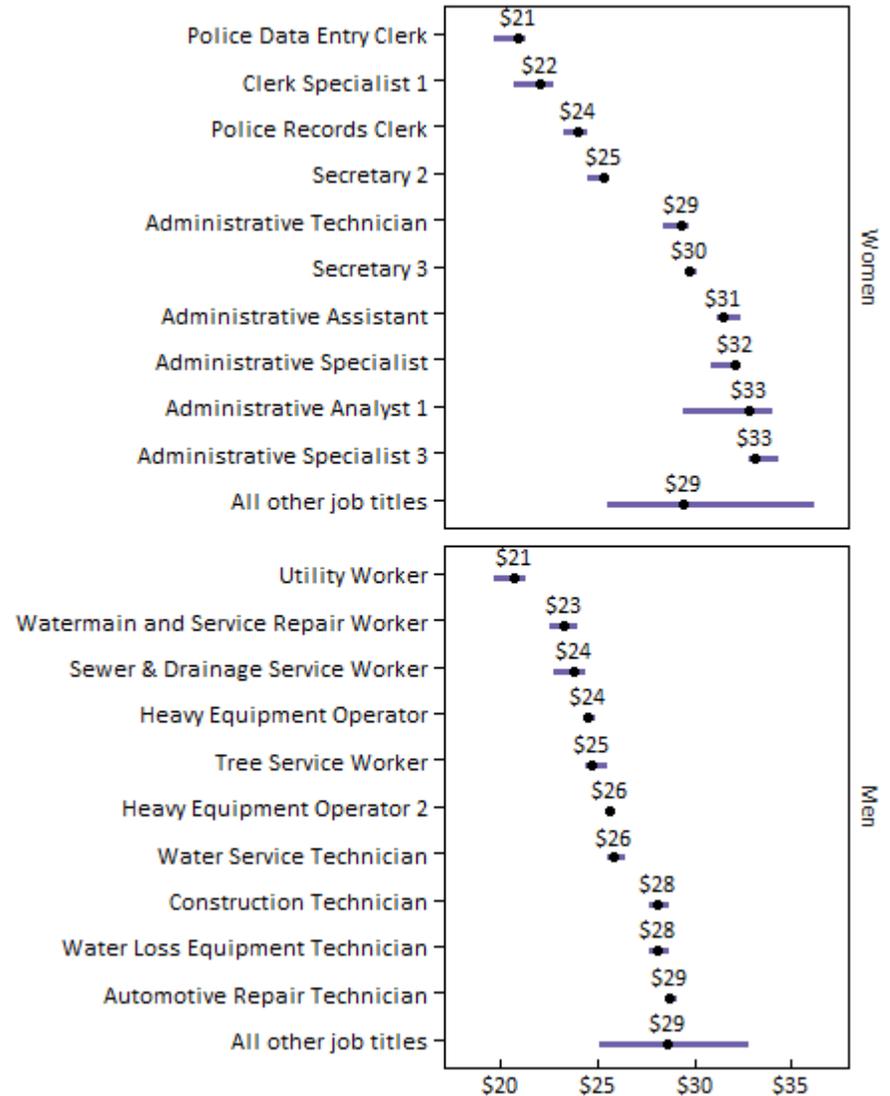
Keen Independent analyzed whether job titles predominantly held by women paid less than job titles held mostly by men. The study team examined job titles with high concentrations of either women or men during the 2017–2024 period. After adjusting for inflation, women working in women-concentrated roles (job titles with no men in at least one year of the 2017–2024 data) made a median hourly wage of \$25.70. This wage was one dollar less than men working in male-concentrated roles (\$26.80), giving a disparity score of about 96.

Figure E-13 to the right shows the median and interquartile range for hourly wages across the 2017–2024 after adjusting for inflation (all values are reported in 2024 dollars). The figure shows the largest job titles by count that were highly gendered; however, note that there were three times as many male-concentrated job titles (86) as female-concentrated job titles (25), after removing job titles with fewer than 10 observations over the 2017–2024 period.

This figure demonstrates that job titles with high concentrations of women do not have hourly rates lower than job titles with high concentrations of men. Many of the male-concentrated job titles not shown in Figure E-13 also had median inflation-adjusted hourly rates above \$30 per hour.

It is also important to note that 40 percent of women-concentrated roles had exempt status, compared to just 7 percent for male-concentrated roles.

E-13. Median and interquartile range of inflation-adjusted hourly rate for gender-concentrated job titles, 2017–2024



Note: The purple line indicates the interquartile range (25th to 75th percentile) for that group.

Source: City employee data, 2017–2024.

E. Pay Equity Analysis — Summary

Keen Independent analyzed City employee wage data from 2017 through 2024 and calculated a disparity score for each employee. This measure expresses an individual's wage as a percentage of the average hourly rate for white men in the same role.

- **Pay disparity analysis.** Analysis of pay disparity scores did not indicate disparities in pay between women and men with the same job title. Median disparity scores were almost always near parity (100), with some notable exceptions, including American Indian employees in 2024 having a disparity score of 95.
- **Regression analysis.** The study team conducted regression analyses to examine factors explaining variation in disparity scores. Regressions provided no evidence of lower average pay for women relative to men in the same job title.

Regression results indicated statistically significant differences in disparity scores for African American men and Asian American men after controlling for other factors. However, the magnitudes of these coefficients are relatively small. African American men are estimated to make about 1 percent less than white men in the same job title and Asian American men are estimated to make about 2 percent less.²⁰⁹ There could be explanations other than race for these disparities that were not revealed in the regression models.

- **Wage growth analysis.** A wage growth analysis shows that, on average, women and men experience similar rates of wage growth over their tenure with the City. There were no gender disparities identified in this analysis.
- **Gender concentration analysis.** The study team also examined the potential for pay inequities due to sorting women and men into gendered roles. The median hourly rates (adjusted for inflation) for the most women-concentrated and male-concentrated job titles showed no evidence that women-concentrated positions were paid less than male-concentrated positions.

However, it is important to note that men (and the roles in which they are most heavily represented) were far more likely to be non-exempt, providing greater access to overtime and, in turn, substantially higher potential earnings.

²⁰⁹ Note that the regression analysis is imprecise due to absence of certain factors that may also influence pay rates, such as education and work history.

APPENDIX F. Qualitative Insights – Introduction

Keen Independent collected input from the City of Toledo leadership and employees to explore perceptions of internal gender equity within the City workforce. This appendix summarizes findings from qualitative feedback.

Methodology

As one step to understanding internal perceptions of equity efforts, Keen Independent conducted listening sessions and in-depth interviews with leadership and employees in June and July 2025.

Recruitment. All employees were invited by the City via email to participate in one of the listening sessions which were conducted via Zoom. Employees and leadership were invited to participate. Individual in-depth interviews were offered to executive leadership. The study team also invited the Mayor to participate in an in-depth interview but due to unforeseen scheduling constraints, he could not attend.

Session structure. The Keen Independent study team facilitated the listening sessions and in-depth interviews following an interview guide in a conversational format.

Analysis

Keen Independent organized this appendix around the following topics:

- Employee perceptions of equity;
- Complaints and retaliation;
- Promotions, performance evaluations and hiring practices;
- Favoritism and preferential treatment;
- Equity in employee compensation; and
- Professional development.

These topics are provided in detail on the following pages. Topics are labeled in the heading of each page. Note that when Keen Independent uses “employee” in those headings, it is usually meant to include “leadership.” However, specific quotes provided in the following pages are identified as coming from “staff” or “leadership.”

F. Qualitative Insights – Employee perceptions of equity

Employee Perceptions of Equity

Keen Independent asked City employees (including leadership) to provide their perceptions of equity in the City. Many interviewees reported that their perception of equity means all City staff are treated equally, and have access to the same resources, pay and opportunities as their peers.

Examples of quotes are shown on the right.

I would define [equity] as all employees are treated equally and fairly ... regardless of their gender.

Leadership

When I think about gender equity, it's about our systems ... from recruitment, to onboarding, to how we hold our supervisors accountable.

Leadership

The first thing I think about [when thinking of equity] is how equal the playing field is.

Staff

To me [equity] means that, regardless of gender, people have an equal opportunity to obtain whatever position that they may be interested in.

Leadership

[Equity means] equal opportunity and availability of resources, positions, pay and opportunity within all genders, races, classes, etc. within the City. I don't want to say a level playing field for all demographics, because there are different life experiences that people have. Some people need more resources than others.

Leadership

I would define [equity] as ensuring that people, regardless of gender or race, or anything really ... [with] all things being equal, their experience, their background, they should be paid the same and treated the same That requires being vigilant and recognizing where there are inequities and fixing it.

Leadership

F. Qualitative Insights – Employee perceptions of equity

Some interviewees reported that the City does not take a proactive approach to promoting gender equity in its policies and practices.

Examples of comments are shown on the right.

... we could do a better job We need to be better at proactive planning for welcoming women into the organization.

Leadership

We tend to be very reactionary, which in the space of gender equity, is a problem.

Leadership

I just want to make sure that [leadership] is aware of problems ... when they start We want to be proactive instead of reactive.

Leadership

I have seen the good and the bad and the ugly of the City's equity policies, it's not always been good. It's not necessarily the best right now, insofar as the whole equity piece goes. It depends on who's in charge and which administration is in charge. Whether they give credence to the whole equity piece or not.

Staff

F. Qualitative Insights – Employee perceptions of equity

Many interviewees discussed their experiences in the City workplace. Interviewees provided feedback on the perceived relationship between gender and role.

Relationship Between Job Category and Gender

Some participants reported that certain work categories or classifications within the City tend to be female dominated, while others are more male dominated.

For example, one interviewee reported that field worker jobs within transportation, utilities, public service and parks tend to have a greater number of male workers.

Stereotypical Attitudes and Unfair Treatment

Some interviewees reported that certain groups of employees are not treated fairly, and that within certain work categories, particularly field work, women are treated poorly compared to male peers.

We have a lot of females in top leadership. Where I think we struggle is females in the first line of supervisory roles and the more mid-management category.

Leadership

There are areas that are more male dominated and [others that are] more female dominated. If you look at it as a whole, I think we're very diverse. That isn't to say certain divisions or areas might not be more or less diverse, accordingly.

Staff

In the field type of divisions, such as transportation, parks, public utilities and public service ... elements of those are very male dominated. In that category, how do we get more females into these types of career fields?

Leadership

There still is a feeling that a female is inferior to a male in field divisions.

Leadership

I have heard stories of some misogynistic stuff that goes on, especially when you get out of offices and get into field or operational work. There tends to be a lot of the "locker room talk" going on.

Staff

We do have supervisors and managers who, unfortunately, take advantage of people. I've seen harassment of people who they know can't defend themselves, because they can't be as articulate.

Leadership

F. Qualitative Insights – Complaints and retaliation

Role of Diversity, Equity and Inclusion Department in Complaints Process

Several employees reported that the City has a fair process for resolving complaints.

We have a very active and excellent department of Diversity, Equity, and Inclusion. And they do a really good job of taking complaints and investigating and interviewing employees and doing the extensive leg work to determine if a complaint is valid or not I think employees utilize that department and recognize that they do good work.

Leadership

Complaints should naturally flow in our system to our Diversity, Equity and Inclusion Department, which is vested with the authority and obligation to investigate both gender discrimination, racial discrimination ... [the vision] is to conduct a good investigation, a fair investigation and generate a report and try and do it as quickly as time would allow in hopes that people would feel heard or that there could be some type of resolution.

Leadership

F. Qualitative Insights – Complaints and retaliation

Fear of Retaliation

Some interviewees reported that fear of retaliation prevents individuals from making complaints even when processes are in place. Other interviewees provided examples of retaliation that they have experienced firsthand or are aware of from colleagues.

Examples of comments are shown to the right.

We do have the office of Diversity and Inclusion, and people know that they can reach out to the department if they feel that they've been discriminated against, based on protected class. Those avenues are pretty well documented. But I do feel that there are a lot of people who, even though we have City policy that talks about a pledge against retaliation ... people are always worried that they'll be retaliated against or treated differently for reporting inequities.

Staff

We've had cases where ... there was at least an argument that a [employee] could make, that there had been retaliation. That was something that we were almost having to deal with more than the actual underlying claim.

Leadership

People don't understand retaliation until it's happening to them.

Leadership

I've heard of people that have reported things be moved to remote offices, have their City vehicles taken from them for no apparent reason and their email privileges taken away from them based off of them trying to speak up for what they feel and believe is right and fair.

Staff

It isn't always safe to make a complaint against somebody who is going to still potentially be there in a leadership role after you've lodged a complaint. People aren't dumb, and they're not naïve.

Leadership

F. Qualitative Insights – Complaints and retaliation

Complaints of Retaliation

Members of leadership reported that the City takes retaliation complaints seriously, noting that leadership uses Equal Employment Opportunity Commission (EEOC) standards as a guiding framework for addressing such concerns.

Examples of comments are shown on the right side of the page.

Our standard is the EEOC. We really use that as our standard in terms of how we define retaliation. We are constantly reminding our directors that we have this guidance.

Leadership

... we take [retaliation] complaints seriously, and [we take] steps to fix it, oftentimes training and retraining and making our middle managers cognizant of how to treat people and how to not take things personally and retaliate. Training is huge.

Leadership

F. Qualitative Insights – Promotions, performance evaluations and hiring practices

Keen Independent asked interviewees about equity and fairness in City promotions practices. Interviewees reported that there are inconsistencies in how City employees' performances are evaluated and how promotions are determined.

Promotions Practices

Aligned with collective bargaining agreements, a few participants indicated that current employees receive preference for promotions. Interviewees also indicated that long-standing employees who are the most likely to be promoted are most frequently male, as those fields at the City have historically been male dominated.

Examples of comments are shown on the right side of the page.

Built into the Union contracts is a preference for internal employees, so it's almost rigged to get a promotion internally.

Staff

There are several criteria associated with in-house promotions, and collective bargaining plays a major role in that.

Leadership

When the majority of our people were hired in the seventies and eighties, it was a male-dominant workforce. When we're looking to hire and promote into supervisory positions, who are the most senior employees? The males.

Leadership

F. Qualitative Insights – Promotions, performance evaluations and hiring practices

Performance Evaluations

Many employees reported that the City does not maintain a consistent system or have metrics in place for performance evaluations, and that any employee review or feedback is left up to managers' judgement. Some interviewees indicated that this practice diminishes consistency and may indicate that promotions are not always based on merit.

Examples of comments are provided on the right side of the page.

We don't do performance evaluations Because we don't give that feedback, it is a barrier. Some employees [feel held back].

Leadership

It is difficult, as a director, not having a formal and consistent [performance evaluation] that I can use for all employees.

Leadership

I've seen people not get promoted, just reclassified into management positions, not having any of the merit that another person has been asked to have There's no consistency insofar as anything that goes on promotionally within the City of Toledo.

Staff

One interviewee reported that the City has a committee review system in place for evaluating all promotions.

Every single promotion that occurs in the city is evaluated by a three-person committee. It's someone from the mayor's office, typically the deputy mayor, someone from the Department of Diversity, Equity, Inclusion, and someone from HR. [That's for] every single promotion outside of safety forces, and safety forces has a similar committee-type approach to promotions There's a lot of robust discussion.

Leadership

F. Qualitative Insights – Promotions, performance evaluations and hiring practices

Hiring Practices

Several interviewees remarked that the City has scoring guides in place for interviews, however they are not always used when interviews are conducted informally.

For leadership positions that [one department] is hiring for, it's more than likely going to be an informal [interview] Sometimes, on the scored interviews, it is the difference of two points ... and that's not always telling you who's the best person for that role.

Leadership

It's an HR decision [whether to do a formal or informal interview]. Typically, all of the unionized positions are going to be a formal interview.

Leadership

To maintain fairness in hiring, one interviewee reported that interview questions are designed to be consistent.

For some positions, they often do informal interviews. That can leave more wiggle room for things like bias. Even then, we tend to make sure, from a selection and evaluation standpoint, that we have a diverse panel of raters Even when [we hold] informal interviews, we still have structured the set of questions to make sure they are all content-valid for the job. We simply don't score them.

Staff

F. Qualitative Insights – Promotions, performance evaluations and hiring practices

Onboarding Practices

Interviewees shared a range of perspectives on the City’s onboarding process, describing both differences in experience and perceptions regarding how new employees are introduced to their roles and the organization.

General comments about onboarding of new employees. Several interviewees expressed concerns about the City’s onboarding practices. Some reported that the onboarding process needs to be improved to better prepare new hires for the job or work environment.

Examples of comments are shown on the right.

We don't do a good job of onboarding and helping people really understand the realities that they will face working in this space.

Leadership

I don't think the City has done formal onboarding until as of recently, within the last year and half.

Staff

[Onboarding] seemed to be an area that was really lacking, and even in that onboarding, I don't think that they necessarily go through the City policies and really get into the weeds of how those are supposed to be applied.

Staff

I don't even think with the onboarding now that they even go over the administrative policies with the new hires.

Staff

... our lack of onboarding and our lack of those basic things puts people at a disadvantage People don't understand what it means to work for the government.

Leadership

F. Qualitative Insights – Promotions, performance evaluations and hiring practices

Leadership perspectives on onboarding practices. Members of leadership reported a different understanding of the City’s onboarding practices. Some reported that the practices are structured and adaptable, highlighting aspects such as coverage of key policies, tailored training for specific roles and adequate resources for new hires.

Examples of comments from members of City leadership are shown on the right side of the page.

... our onboarding process ... does include a pretty robust component about the basic discrimination laws and ... In our DEI department, you know how to bring a complaint if you have one.

Leadership

With all positions ... one of the unique things about [my department] ... We [have multiple types of employees]. Those onboarding processes are going to look a little different.

Leadership

If you start on a Monday, you’re with me four days prior to orientation ... they’ll do a three-hour presentation in regards to retirement, healthcare, etc.

Leadership

They used to do [first] Fridays, now it’s monthly.

Leadership

... we kind of go through a checklist of, ‘Here’s your keys. Here’s your identification. This is your start times. This is your lunch breaks,’ and go through that whole process, generally based off of, or depending on, what day of the week you start.

Leadership

F. Qualitative Insights – Promotions, performance evaluations and hiring practices

Records Management

Interviewees reported that employment records are not maintained at a level sufficient for the City’s needs and that it will be another 18 months before the City has its new human resources information system (HRIS).

This is no secret. We need help in HR. We need to have a very coordinated look at how we look at our workforce, be more strategic and be more proactive.

Leadership

We don't have an HRIS. We are working on it right now, but it'll be 18 months before it's up. We don't have a really good way to communicate broadly ... and I think that is a barrier.

Leadership

There is support for an [learning management system] LMS, but there's just not the budget or the foundation to do it It's just not something that higher ups have given resources for.

Staff

[Exit interview data] would not be easy to track. You would have to get those records from each division. They're likely reliant upon a supervisor that actually wrote them down and put them in the employees' files. I don't know if that would ever get elevated, or who would see it.

Staff

If you're the HR department, and I'm coming to you asking for information showing whether or not I'm being paid appropriately for the work that I'm doing, and you can't provide me with that, then that's a problem.

Staff

F. Qualitative Insights – Favoritism and preferential treatment

Interviewees provided feedback regarding the potential for favoritism and preferential treatment based on interpersonal relationships.

Preferential Treatment through Tailoring of Job Descriptions

Some interviewees reported that job descriptions may be tailored to closely fit the background of specific individuals.

If somebody has a person in mind [for a position], and let's say they don't have a four-year degree. They'll go back to the job description and change it.

Leadership

I've seen people rewrite job classifications and job specifications to be able to fit a [specific] person's background.

Staff

Other Examples of Perceived Preferential Treatment

Examples of additional comments concerning preferential treatment are shown on the right.

It's not that there's different rules for different people, but those lines get very blurred for certain people.

Leadership

People get promoted based off of skin color and not their credentials. I've seen people, myself included, get passed over for raises and promotions and it be given to less qualified individuals ... because they're friends with the commissioner, or friends with the director or they're politically connected to who's on the 22nd floor.

Staff

If you're not friends with the right people or in the right circle, you could be bypassed or not selected for a position, even though your qualifications would warrant that.

Staff

I've heard from our employees and from directors and commissioners that there's this general feeling that people know who the favorites are and who is going to get what they want.

Leadership

F. Qualitative Insights – Equity in employee compensation

Some interviewees commented on City employees' compensation.

Perceived Differences in Pay based on Race and Gender

Some interviewees reported that there are gaps in compensation based on race and gender. Examples of comments are shown on the top right.

Perceived Pay Disadvantages for Long-term Employees

Other interviewees remarked that long-time employees' pay rates are consistently lower than newer employees' pay rates which are based on the current market rate.

Examples of comments are shown on the bottom right side of the page.

The four lowest paid managers are all Black females It's not based on years of experience. It's not based on years with the City. The only things that I could find that clearly and directly predicted that pay range ... was sex and ethnicity.

Staff

We have a true disparity in compensation.

Leadership

It's especially challenging being a younger female in a predominantly male operating world.

Leadership

If you give the lowest paid Black female managers a raise, the white male managers are going to say, 'me, too.' That is a norm within the City, and that argument works.

Staff

... we see plenty of people that tell us that they've been with the City for 6 years and get paid the same as the guy who came in yesterday.

Staff

... especially when talking about rates of pay having some set of expectations or guidelines would be really helpful.

Leadership

F. Qualitative Insights – Professional development

Interviewees also provided information about the City’s professional development opportunities.

Training Current and Future Leaders

Some interviewees commented on the value of leadership training for current and future leaders. Examples of comments are shown on the top right.

Other Comments about Professional Development

Interviewees reported the need for enhanced career development opportunities and increased employee engagement to support professional growth and organizational commitment. Examples of comments are shown on the bottom right side of the page.

At the highest levels, the commissioners, the directors, need better leadership training. However, we don't have the mechanisms or the drive to force them to do it.

Staff

I don't think we could do too much education of reminding people what proper decorum is in the workplace You can't overdo education [about how to manage and work with employees].

Leadership

I think we need more consistent networking opportunities for leaders to have an open dialogue of what the challenges are and what they have identified as successes.

Leadership

There are hardly any mechanisms to be able to mentor someone who may want to advance their career. Just recently did the City start to implement training where employees can ... enhance their abilities.

Staff

One staff member commented on specific barriers to obtaining training.

I am aware of times when employees were willing to pay for attendance at a conference and use their vacation time or comp time and were denied that time off to attend those conferences.

Staff