

Policy Statement: COUNTY OF VENTURA

Grantee Name: County of Ventura
Address: County Executive Office
Human Resources Division
800 South Victoria Avenue, L#1970, Ventura, California 93009

Contact: Matt Escobedo, Deputy Executive Officer, Human Resources Equal Employment Opportunity (EEO) Officer (805) 662-6584.

Date and Effective Duration of Equal Employment Opportunity Plan (EEOP): February 14, 2024, to February 28, 2026, or two (2) years from the date of approval by the Office of Justice Programs.

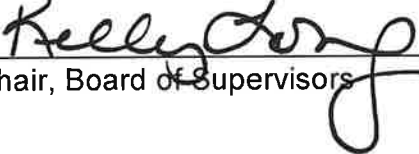
Policy Statement:

It is the County of Ventura's policy to ensure equal employment opportunity to its employees and applicants for employment on the basis of fitness and merit, without regard to race, color, national origin, citizenship status, religion, sex, gender identity/expression, sexual orientation, medical condition or disability, genetic information, age, marital status, familial/parental status, military/veteran status, political activities/affiliations or status as a victim of domestic violence, assault or stalking, and, to otherwise adhere to all state and federal EEO-related mandates.

The County of Ventura will follow this policy in all areas of employment including, but not limited to, recruitment, hiring, and promotion into all classifications, and with respect to matters of compensation, benefits, transfers, assignments, tours of duty, shifts, layoffs, returns from layoff, demotions, terminations, training, educational leave, social and recreational programs, and use of County facilities. This policy is not intended to permit or require the lowering of bona fide job requirements or qualification standards to give preference to any employee or applicant for employment.

Any employee of the County of Ventura who fails to comply with this policy is subject to appropriate disciplinary action.

As Chairperson of the Board of Supervisors, I hereby direct that this policy be implemented in accordance with the County's Equal Employment Opportunity Plan.



Chair, Board of Supervisors

ATTEST: DR. SEVET JOHNSON
Clerk of the Board of Supervisors
County of Ventura, State of California

By: 

Deputy Clerk of the Board



County of Ventura Equal Employment Opportunity Plan: Utilization Report

BACKGROUND

The Equal Employment Opportunity Plan (EEOP) is a report of the County of Ventura (County)'s workforce by gender and race or ethnicity, required by the Department of Justice (DOJ) as a condition to receive grant funding. The DOJ's online automated survey compares the County's workforce to the community labor market in Ventura County and computes a statistical Utilization Analysis to determine areas of under-utilization (or under-representation). A chart of the Underutilization Analysis provides a visual representation of the areas that would benefit from greater diversity. The County has established objectives to address the areas of underrepresentation in the workforce, and strategies to meet those objectives. The County is required to make this Plan available to personnel within the County and the public. Once approved, it will be viewable on the County's Human Resources Website at: <https://hr.ventura.org/equal-employment-opportunity>.

METHODOLOGY

The following analysis is based on Community Labor Statistics (CLS) derived from the 2020 United States Census. The numbers describing the County workforce are based on a "snapshot" of data taken on December 4, 2023, from the Ventura County Human Resources Payroll System (VCHRP). A primary component of the plan is the Utilization Analysis that reflects a comparison of County employees to labor market availability (using CLS) by race/ethnicity and gender in defined occupational categories. An occupational category is a broad grouping of job classes that require similar levels of skills or training. The County's job classifications are each mapped to an occupational category based upon the U.S. Equal Employment Opportunity Commission (EEOC) definitions and descriptions of the category.

The process for this specific plan is consistent with the 2021-2023 EEOP. The Department of Justice made no changes in the method of formulation and presentation of the data. Jobs are classified as recommended by the U.S. Department of Justice by way of the U.S. Census Bureau's *Occupational Crosswalk to State and Local Government Job Categories*. The structure of our current job categories, a definition of what they entail, a list of prominent classifications that are included in each category, and the corresponding number of full-time equivalent positions (FTE) are illustrated in Table 1.

**Table 1: EEO Occupational Categories –
Prominent Classifications and Total Number of FTE Within the County**

EEO Occupational Categories	Definition	Prominent Classifications	No. of County FTE per Category
Officials/Administrators	Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district, or area basis.	County Executive Officer, Deputy Executive Officer, Department Director (non-elected), Assistant Department Director	395
Professionals	Occupations that require specialized and theoretical knowledge usually acquired through college training or work experience and other training that provides comparable knowledge.	Attorney, Engineer, Planner, Accountant, Program Administrator, Staff/Services Manager	4230
Technicians	Occupations that require a combination of basic scientific or technical knowledge and manual skill obtained through specialized post-secondary school education or through equivalent on-the-job training.	Client Benefit Specialist, Phlebotomist, Programmer, Survey Technician, Water Resource Specialist	1385
Protective Services: Sworn-Officials	Occupations in which senior managers are entrusted with public safety, security, and protection from destructive forces, with arrest powers.	Sheriff's Captain, Sheriff's Sergeant, Supervising Deputy Probation Officer	153
Protective Services: Sworn	Occupations in which workers are entrusted with public safety, security, and protection from destructive forces, with arrest powers.	Correction Services Officer, Deputy Probation Officer, Deputy Sheriff, District Attorney Investigator	888
Protective Services: Non-Sworn	Occupations in which workers are entrusted with public safety, security, and protection from destructive forces, without arrest powers.	Firefighter, Fire Investigator and Fire Specialist, Harbor Patrol Officer, Sheriff's Service Technician	353
Administrative Support	Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information, and other paperwork required in an office.	Office Assistant, Accounting Assistant, Records Technician, Courier, Medical Billing Specialist	1834
Skilled Craft	Occupations in which workers perform jobs that require special manual skill and a thorough and comprehensive knowledge of the process involved in the work acquired through on-the-job training and experience or apprenticeship or other formal training programs.	Auto Mechanic, Heavy Equipment Mechanic, Maintenance Electrician, Equipment Operator	118
Service/Maintenance	Occupations in which workers perform duties that result in or contribute to the comfort, convenience, hygiene, or safety of the general public or that contribute to the upkeep/care of buildings, facilities, or grounds of public property.	Maintenance Worker, Jail Cook, Parks Service Ranger, Warehouse Coordinator	664

RESULTS

The Utilization Analysis Table (Table 2) indicates underutilization and overrepresentation of various groups in the County's workforce when compared to the availability of those same groups in Ventura County's general population.

The data was generated using an internet-based software application provided by the United States DOJ-OJP, which in turn was derived from the 2020 U.S. Census. The software identifies underutilizations and overutilizations which it deems statistically significant. That is, for each job category with greater than 30 employees, a statistical analysis is performed and then displayed for any job categories with underutilizations of two or more standard deviations. Each of these underutilizations, deemed statistically significant by the DOJ-OJP software, is addressed in the following narrative. Underutilizations that were not deemed statistically significant, while recognized, are not addressed in the narrative. Please note workforce data was provided for the occupational categories Protective Services: Sworn Patrol Officers and Protective Services: Sworn Officials. However, the DOJ-OJP software program aggregates these categories in the Utilization Analysis.

Please also note that the County is currently unable to report data for "Two or More Races" as an ethnicity. An option was recently added to the County's payroll system (VCHRP) that allows employees to modify their personal data to add more than one ethnicity for EEO reporting purposes. However, as of the writing of this report, only a few employees have done so. In the future, this data will be added when we have a more representative number of participating employees.

As set forth in the "Objectives" portion of this Plan, corrective measures, consistent with federal and California law, are being taken in each instance where there is statistically significant underutilization. As a whole, the County workforce is reflective of the community we serve although under-representations exist in some areas, particularly in Protective Services and to a lesser degree the Service/Maintenance categories.

NARRATIVE UTILIZATION ANALYSIS

While the underutilization for each gender/ethnicity is listed below, there are also overutilizations reflected in Table 3. The orange values are underutilizations and the green values are overutilizations. The following narrative utilization format is standard of Equal Employment Opportunity plans and outlines how to mitigate the significant underutilizations.

- **Black/African American males and females** are no longer underutilized in any categories.
- **White males** are underutilized by 10% in the Professionals category, 15% in the Administrative Support category. Those underutilizations may be brought to within 1% with the additional employment of 411, and 267 individuals of the aforementioned race and gender in jobs within each of the respective categories.
- **White females** are underutilized by 7% in the Professionals category, 12% in the Administrative Support category, and 7% in the Service/Maintenance category. These underutilizations would be brought to within 1% with the additional employment of 278, 197, 39 individuals of the aforementioned race and gender employed in jobs within each of the respective categories.
- **Hispanic/Latino males** are underutilized by 11% in the Protective Services: Sworn Officials category, which would be brought to within 1% with the additional employment of 16 individuals of the aforementioned race and gender. Underutilization in Technicians, Administrative Support and Service/Maintenance categories exists at 14%, 6% and 4%. These underutilizations would be brought to within 1% percent with the additional employment of 177, 88 and 23 individuals of the aforementioned race and gender employed in jobs within each of the respective categories.
- **Hispanic/Latino females** are underutilized by 4% in the Skilled Craft, Service/Maintenance, and the Protective Services: Non-Sworn categories. These underutilizations would be brought to within 1% with the additional employment of 4, 19 and 10 individuals of the aforementioned race and gender employed in jobs within each of the respective categories.
- **American Indian or Alaskan Native males and females** are not underutilized in any categories.
- **Asian males** are underutilized by 3% in the Officials/Administrators category, by 4% in the Professionals category, 2% in the Technicians category, and 2% in the Administrative Support category. These underutilizations would be brought to within 1% with the additional employment of 6, 99, 5, and 9 individuals of the aforementioned race and gender employed in jobs within each of the respective categories.

- **Asian females** are underutilized by 1% in the Administrative Support category and are no longer significantly underutilized in the Technicians or Service/Maintenance categories. The underutilization may be brought to within 1% with the additional employment of 7 individuals of the aforementioned race and gender employed in jobs within this category.

- **Native Hawaiian or Pacific Islander males and females** are not underutilized in any categories.

**Table 2: Overview by Ethnicity Only
Ventura County Workforce & Community Labor Statistics Comparison**

EEO Category		*Community Labor Statistics	Ventura County Workforce	Variance
B/AA	Black/African American	1.86%	2.81%	+0.95%
W	White	43.86%	38.62%	-5.24%
H/L	Hispanic/Latino	44.40%	48.98%	+4.58%
AI/AN	American Indian or Alaskan Native	1.77%	0.55%	-1.22%
A	Asian	7.89%	8.10%	+0.21%
NH/PI	Native Hawaiian or Pacific Islander	0.21%	0.93%	+0.72%

* The Community Labor Statistics column listed above does not reflect those identifying as "other" or "two or more races". Source: data.census.gov/profile/Ventura_County,_California?g=050XX00US06111#race-and-ethnicity

**Table 3: All Workforce Over/Underutilizations
By Job Category, Race and Gender**

Job Category	Male						Female					
	W	H/L	B/AA	AI/NA	A	NA/PI	W	H/L	B/AA	AI/AN	A	NA/PI
Officials/Administrators	-2%	-2%	-1%	0%	-3%	0%	-1%	6%	2%	0%	2%	0%
Professionals	-10%	2%	0%	0%	-4%	0%	-7%	19%	1%	0%	1%	1%
Technicians	1%	-14%	0%	0%	-2%	0%	1%	13%	1%	0%	0%	0%
Protective Services: Sworn	10%	-11%	-1%	0%	-2%	0%	4%	3%	-1%	0%	0%	0%
Protective Services: Non-sworn	3%	1%	3%	1%	2%	0%	-3%	-4%	1%	0%	-2%	0%
Administrative Support	-15%	-6%	0%	0%	-2%	0%	-12%	37%	0%	0%	-1%	0%
Skilled Craft	2%	2%	1%	0%	0%	1%	0%	-4%	1%	0%	-1%	0%
Service/Maintenance	14%	-4%	1%	0%	1%	1%	-7%	-4%	0%	0%	0%	0%

**Table 4: EEO Required Reporting –
Statistically Significant Workforce Underutilizations**

Job Category	Male						Female					
	W	H/L	B/AA	AI/NA	A	NH/PI	W	H/L	B/AA	AI/AN	A	NH/PI
Officials/Administrators					-3%		-1%					
Professionals	-10%				-4%		-7%					
Technicians		-14%			-2%							
Protective Services: Sworn		-11%										
Protective Services: Non-sworn								-4%				
Administrative Support	-15%	-6%			-2%		-12%				-1%	
Skilled Craft								-4%				
Service/Maintenance		-4%					-7%	-4%				

OBJECTIVES

The County of Ventura is committed to ongoing efforts, within the legal framework set by both California and federal law, to ensure there are no artificial barriers in place to prevent its workforce from being reflective of the local community labor workforce and to otherwise ensure equal opportunity in all aspects of employment.

With the leadership of our Board of Supervisors and support of the CEO, the Diversity, Equity, and Inclusion Council (Formerly Task Force) was launched in February of 2017. The Council has a goal of promoting diversity, equity, and inclusion across all layers of the organization. As such, all areas of Human Resources have these concepts embedded within their goals/objectives.

Steps to achieve the objectives above include the following:

Recruitment and Selection

Recruitment

1. **Continue holding specially tailored recruitment events and job fairs** for specific occupations including those in the Sheriff's Office, Fire Department, and Health Care Agency. We also hold our own annual job fair geared toward all County of Ventura jobs and plan to continue that practice.
2. **Engage local educational institutions and community stakeholders in a collaborative effort to identify local sources of talent** and develop mutually beneficial talent pipelines in the form of student employment searches, internships, or fellowships.
3. **Continue to execute a thorough and inclusive recruitment and selection process for firefighter trainees** which is engineered to avoid adverse impact, shifts from technical expertise to generalizable characteristics which suggest a candidate may be successful in the academy and allows for all qualified candidates to participate. Our goal is to work to mitigate our underutilization of females in the Fire Department.
4. **Continue to execute recruitment strategies engineered to attract females to consider a career in the fire service** such as camps geared to girls ages 14 to 18, our female-focused fitness events, and outreach to female collegiate athletic programs. We recognize the need to plant the seed early and work to develop interest.
5. **Continue to execute recruitment strategies engineered to attract females to the Sheriff's Office.** The Sheriff's Office has held a successful women's empowerment and recruitment campaign since 2019 with events, speakers, and marketing demonstrating successful career paths and opportunities with the Ventura County Sheriff's Office. This endeavor will continue in 2024.

6. **Continue to utilize social and print media and various other outlets to advertise our job opportunities** as we recognize the need to reach all segments of our community and to reach out nationally for many of our vacancies, including those at the leadership level. LinkedIn and Instagram are a few platforms we consistently leverage. We also translate select recruitment bulletins into Spanish if data suggests it would expand our level of outreach.
7. **Continue to attend job fairs to engage all sectors of our community** including areas that may be underserved, underrepresented, or disadvantaged. The goal is to illustrate our commitment to welcome all in the community to compete for an opportunity to become a public servant. Consistent with that commitment, CEO-HR attended 23 job fairs in 2023 and the Fire Department attended 24 job fairs in 2022 and 2023.
8. **Continue to reconfigure our job announcements so they are appealing to all cultures and generations** and to highlight the meaningful work we do at the County of Ventura. Our goal is to highlight the most pertinent information to draw in prospective candidates.

Selection

1. **Continue to manage a full scope competitive executive (at-will) recruitment program** wherein we are committed to developing and administering nationwide customized search strategies that focus on locating and recruiting well qualified candidates who match the agency's unique needs while being mindful of the County's commitment to diversity, equity, and inclusion.
2. **Continue to advocate for open competitive recruitments as frequently as possible to promote EEO/DEI outcomes.** For each recruitment, we will determine if the field of competition will be open, countywide, or department/agency promotional. We evaluate these on a case-by-case basis and recommend the field best suited for the subject vacancy. During the last calendar year, approximately 80 percent of our recruitments were open competitive, allowing anyone from the public the opportunity to apply, whereas the other 20percent were promotional opportunities exclusively available to County employees, which is appropriate when there is a large pool of internal candidates for consideration.
3. **Continue to allow and accept the maximum number of applications possible for our recruitment processes.** We are one of very few public agencies that accepts online and paper applications. We also require only a resume/cover letter for executive recruitments to maximize the number of applicants we receive. We recognize our applicants as our customers and work tirelessly to ensure they have a positive experience during the selection process.
4. **Continue to be inclusive in accepting and screening employment applications.** We have removed/diminished the use of potential barriers to

employment, including fixed filing periods and random selection for large candidate pools. Further, when possible, we employ the use of inclusive minimum qualifications allowing for experience to substitute for educational requirements (and vice versa) whenever feasible. Our goal is to allow as many qualified candidates as possible to compete in our selection processes.

5. **Continue to strike Personally Identifiable Information (PII)** during the administration of structured application screening processes, such as those for minimum qualifications and related measures of training and experience, and during select executive recruitment processes.
6. **Continue to provide training to raters for all exams, including structured interviews**, to ensure raters are aware of how both conscious and unconscious bias may contaminate their ratings and diminish the quality and integrity of the process.
7. **Pilot, Test, and Implement a Competency Modeling Approach to Job Analysis** to allow for the identification of selection criteria that facilitate greater emphasis on diversity such as value orientation and personality characteristics. Further, competency models provide higher face validity, are preferred by subject matter experts, and present a variety of functional advantages. We shall also continue to use our very thorough and robust job analysis processes to validate our examination processes.
8. **Pilot, Test, and Implement a Broad-Based Testing Program** to allow for improved quality, reliability, and efficiency. The program shall: a) allow for a reduction of redundant testing; b) reduce time to place candidates on eligible lists; c) ensure lists are always available; and d) allow more opportunities for employment when a candidate is successful on an employment examination.
9. **Continue to review, develop, and administer operating guidelines for the development and administration of employment examinations**, including written examinations, training & experience evaluations, practical examinations, and structured interviews. These documents shall promote the utmost quality in exam administration and will result in consistency in the administration of our employment testing program across all agencies/departments of the County of Ventura. We also have controls in place to ensure our processes are free of bias.
10. **Continue to conduct (and train staff to conduct) item analyses of written exams** to ensure tests are psychometrically sound, reliable, and result in no adverse impact. We will also periodically analyze examination results to review for potential disparate or adverse impact prior to placing names on an eligible list.
11. **Continue to implement psychometrically sound scoring models used for existing examinations** to ensure all employment exams are fair, efficient, equitable, defensible, and refrain from any adverse or disparate impact. These models shall comply with industry standards, including those outlined in the EEOC

Uniform Guidelines on Employee Selection Procedures, Principles for the Validation and Use of Personnel Selection Procedures (SIOP), and Standards for Educational and Psychological Testing.

EEO Compliance

1. **Continue to administer a full EEO Compliance Program**, including the review of County policies to ensure a non-discriminatory environment, maintenance of the County Employee Misconduct Hotline, and administration of investigations into complaints of discrimination, harassment, and/or discourteous treatment.
2. **Continue to train professional-level analytical staff in best practices related to administrative investigations** to allow the organization to conduct fair, timely, and thorough investigations that provide all parties with appropriate due process and to reach conclusions based upon the evidence collected in alignment with our Discrimination, Harassment, and Retaliation Prevention Policy.
3. **Continue to notify and market the County's complaint resolution procedure** that outlines how individuals who believe they have been discriminated against or harassed in any manner may have their complaints investigated.
4. **Continue to monitor EEO data**, including rates of promotions, hires, and separations for the County workforce demographics, especially in areas of underutilization.
5. **Continue to review exit interview surveys** to assess employee satisfaction, work climate, and understanding of turnover. Survey forms are given to exiting employees to be completed externally and returned to a centralized location to minimize possible discomfort in revealing the reasons for leaving. Centralizing the feedback data permits improved monitoring and allows action to be taken to improve the working environment across the County.

Classification & Compensation

1. **Continue to create, revise, delete, and update classification specifications** to ensure the scope of each job reflects the appropriate knowledge, skills, and abilities and has qualifications that are in alignment with our commitment to diversity, equity, and inclusion. Further, we ensure requirements are necessary and equitable and do not burden any one group.
2. **Continue to review all agency/department requests for classification studies** to determine if positions are appropriately classified and reflect current job specifications, or if they need re-classification or revision based on a thorough review of the assigned job duties.
3. **Continue to conduct total compensation studies** to ensure the County is setting salaries for new positions at the appropriate level sufficient to attract well qualified candidates and to ensure we retain top talent within the County organization.

4. **Continue to conduct job evaluation studies** evaluating internal equity and alignment to ensure employees receive fair and equitable compensation based upon objective job evaluation methods.
5. **Establish career ladders** so prospective candidates can: a) preview the required qualifications; b) submit job interest cards; and c) ensure they are prepared and eligible to compete for all applicable promotional opportunities.
6. **Review our Classification & Compensation processes to ensure they are free from bias.** The examination shall be through the lens of diversity, equity, and inclusion to ensure there are no unintended consequences that require correction.
7. **Conduct a Gender Pay Equity Parity Study** to ensure County salary appointment practices are equitable, appropriate, and do not unintentionally cause a compensation divide between different groups that are similarly situated.

In addition to recruitment, compliance, and maintenance of the classification structure, the County CEO Learning & Organizational Development team will continue to provide employees multiple training and professional growth opportunities to raise awareness of equal employment opportunity and diversity, equity, and inclusion.

Learning and Organizational Development

1. **Continue to Administer Training that promotes Diversity, Equity, and Inclusion.** The County has initiated and implemented training to enhance employees' ability to work effectively in cross-cultural situations and to recognize implicit bias. Plans are underway to further promote a broad series of other topics related to diversity, equity, and inclusion subject matter.
2. **Continue to administer the Mentorship Program.** The County recently launched the fifth cohort of the Mentorship Program designed to help prepare professional staff to be successful candidates for management and senior management positions by providing participants one-on-one time with effective senior managers.
3. **Continue to facilitate a process to solicit ideas/suggestions** from staff and the community so as to promote engagement, idea generation, collaboration, and facilitation of concepts that promote diversity, equity & inclusion.
4. **Continue to market our Educational Incentive Program** that rewards employees who develop generalizable knowledge, skills, and abilities by attaining advanced education that is not a requirement for their position.
5. **Continue to market our Textbook and Tuition Reimbursement Programs** and requesting that where operationally feasible, department/agency heads be sensitive to the need for variable work schedules to accommodate vocational, certificate, and college coursework.

6. **Continue to administer our Leadership, Excellence, and Action Program (LEAP)** to ensure County leadership has a strong commitment to principles of diversity, equity, and inclusion as well as equal employment opportunity. The program is focused on increasing the awareness and emotional intelligence necessary to be an effective leader. We are also amending the program to focus on a curriculum of developing competencies necessary for emerging leaders.
7. **Continue to administer our Nuts & Bolts Management Training Program** in order to provide coaching, resources, and support to new County managers. Nuts & Bolts training focuses on how to manage the business operation, oneself, and (most importantly) people.
8. **Continue to manage mandatory training compliance.** Continuing to enroll all County employees in Discrimination and Sexual Harassment Prevention classes every two (2) years. All newly appointed staff will continue to be required to attend these two training workshops within six (6) months of appointment. These training workshops, in particular, are designed to educate and assist managers and supervisors in eliminating bias in the application, selection, staff development, and retention process. This initial and follow-up training is mandatory for all employees and completion is tracked.
9. **Continue to develop and maintain the County Workforce Development Program** which has two objectives. First, to educate prospective candidates and the public about the origin and structure of our recruitment and selection processes to promote transparency and allow better candidate preparation. Second, to provide the specific tools, guidance, and resources necessary to increase the likelihood that a prospective candidate's performance during the selection process is reflective of their true capabilities. This is accomplished by extensive literature published on our County HR website, including the following:
 - a. A summary of our application screening process includes five instructional videos titled as follows:
 - i. *How to Successfully Complete an Application (Part 1)*
 - ii. *How to Successfully Complete an Application (Part 2)*
 - iii. *Common Application Mistakes*
 - iv. *Finding the Right Job Opportunity*
 - v. *How to Submit a Successful Job Interest Card*

In addition, the *How to Submit a Successful Application* page on the HR website explains how we screen applications, what the raters are looking for, and suggestions of what you should and should not do.

- b. A summary of how we prepare written tests, what we test for, how to prepare, and practical resources such as publications and locations where more information can be found. Further, there are tips for what to do before, during, and after a written exam to facilitate success.
- c. A summary of how to prepare for an oral exam, including a thorough description of what an exam looks like, how panels are convened, and the types of questions to prepare for. There are also some practical techniques such as the STAR technique which robust research has found to be effective.
- d. A summary of what practical exams look like, a taxonomy of practical exams, how to identify which one a candidate may see, and how to prepare for them.
- e. A summary of how to prepare for a selection interview, including what makes them different from oral exams. The page is intended to educate candidates, so they are aware of what to expect.
- f. Within two years, we hope to establish training in areas (a) through (e) above in both in-person and online formats.