



OREGON DEPARTMENT OF AVIATION AFFIRMATIVE ACTION PLAN

2027-29 BIENNIUM

Prepared July 2026

Alternate formats are available by calling 503-378-4880.



Oregon

Tina Kotek, Governor

Oregon Department of

Aviation

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Juliet Valdez
Affirmative Action Manager
Office of Cultural Change
Department of Administrative Services
155 Cottage Street NE
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July 31, 2026

Dear Ms. Valdez:

The Oregon Department of Aviation remains committed to affirmative action, equal employment opportunity, and a workplace where employees and applicants are treated with dignity and respect. This plan reflects the agency leadership team's responsibility to carry that commitment into recruitment, hiring, employee development, retention, public service, and contracting.

The plan is intended to meet the requirements of ORS 182.100, ORS 243.305 and 243.315, ORS 659A.012 and 659A.015, Executive Order 22-11, Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act, Section 503 of the Rehabilitation Act of 1973, and current statewide human resource policies. It also aligns ODAV's affirmative action work with the agency's DEI Plan and Strategic Plan.

This Affirmative Action Plan has my complete authorization and support. Agency managers and employees share responsibility for implementing its goals and for maintaining a respectful, accessible, and discrimination-free workplace.

Kenji Sugahara
Director

Kristen Forest
Affirmative Action Representative

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Description of the Agency

Agency Overview

Founded in 1921 as the nation's first state government aviation agency, the Oregon Department of Aviation (ODAV) promotes, develops, and maintains a safe, efficient, and resilient statewide aviation system. The Department supports aviation infrastructure, public safety, economic development, statewide connectivity, and responsible integration of emerging aviation technology.

ODAV operates and maintains 28 state-owned airports and supports Oregon's broader aviation system. The Department licenses public-use airports, registers aircraft based in Oregon, administers state and federal aviation grants, conducts airspace safety evaluations, and supports uncrewed aircraft systems (UAS) and advanced air mobility (AAM) initiatives. ODAV carries out these responsibilities with 15 full-time equivalent positions during the 2025-27 biennium. The 2027-29 Agency Request Budget proposes 13 full-time equivalent positions.

Oregon Aviation Board

Policy direction is provided by the seven-member Oregon Aviation Board. Board members and the Director are appointed by the Governor and confirmed by the Oregon State Senate. The Board oversees implementation of Oregon aviation law and provides strategic direction for development, management, education, and promotion of Oregon's aviation system.

Mission, Vision, and Strategic Objectives

Mission	The Oregon Department of Aviation enables and advocates for a safe and efficient aviation system that connects communities and drives economic growth.
Vision	ODAV will be a leader in connecting and protecting communities through a resilient, sustainable, and technologically advanced aviation system that prepares Oregon for the future.

ODAV's Strategic Plan identifies five agency objectives:

1. By December 2026, identify, advocate for, and pursue long-term stable funding mechanisms that increase annual funding by at least 100 percent.
2. By December 2028, complete and digitize biennial statewide infrastructure and resiliency assessments and airport data for all Oregon public-use airports, and prioritize state grant funding for projects that improve safety, resiliency, sustainability, and innovation.
3. By December 2030, update airport guidance, policies, rules, standards, agreements, and the Oregon Aviation Plan to ensure compliance with FAA guidance and to prioritize safety, resiliency, sustainability, and innovation.
4. By December 2027, develop a comprehensive communications plan, including a social media strategy and outreach program, with a goal of increasing recognition and engagement by 50 percent as measured through survey and analytics data.
5. By December 2027, develop and launch a statewide UAS and AAM framework and program that supports economic, research, and educational opportunities with at least three public- or private-sector entities.

Identification of Key Employees

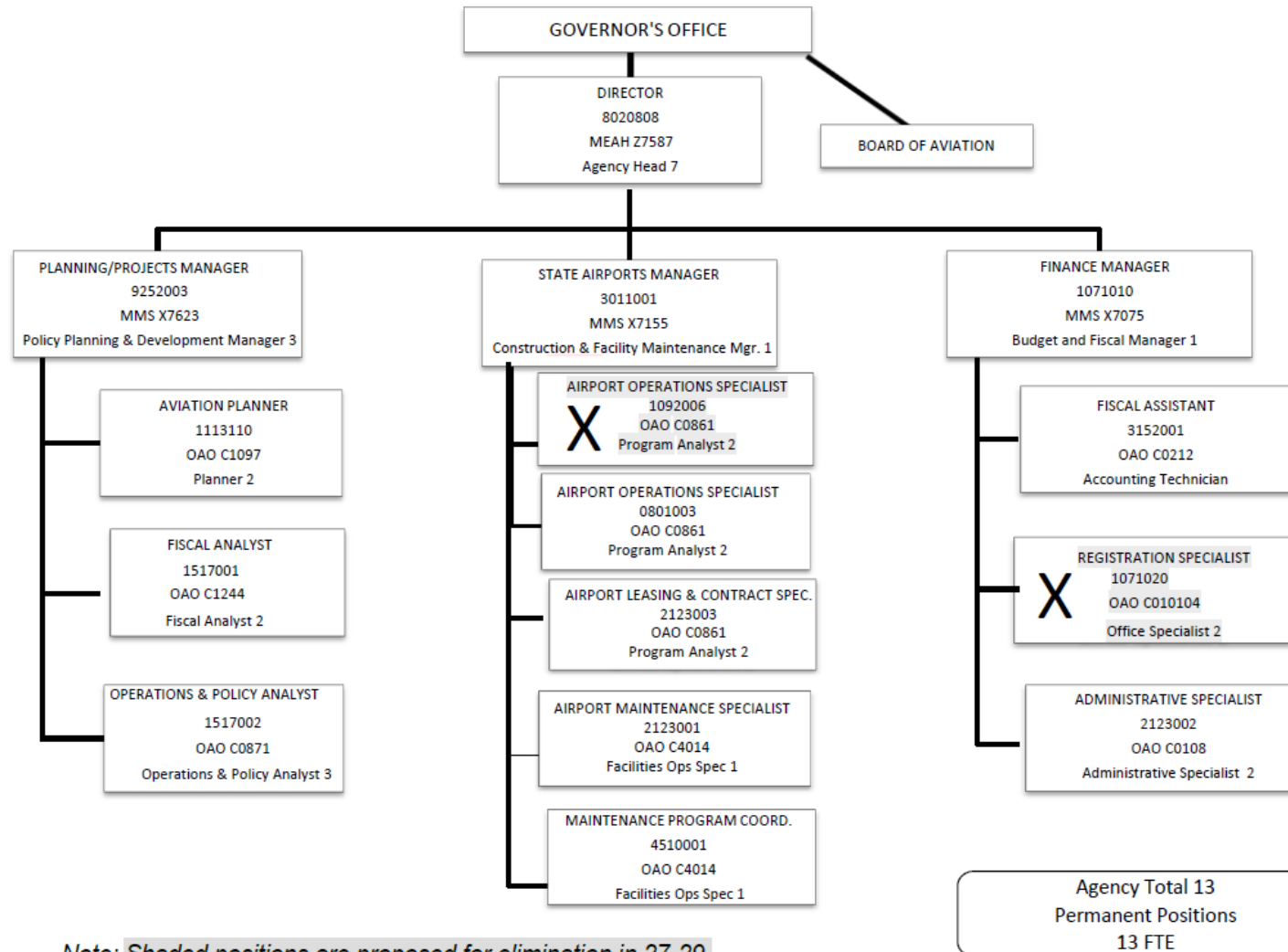
Agency Director	Kenji Sugahara, Director 3040 25th Street SE, Salem, OR 97302-1125 503-378-2340 kenji.sugahara@odav.oregon.gov
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Governor's Policy Advisor	Kelly Brooks, Transportation and Infrastructure, Oregon Office of the Governor 503-373-1558 kelly.s.brooks@oregon.gov
Affirmative Action Representative and Agency Equity Lead	Kristen Forest, Business and Finance Manager 3040 25th Street SE, Salem, OR 97302-1125 503-378-2522 kristen.r.forest@odav.oregon.gov
Lead for COBID Contracting and Procurement	Alex Thomas, Planning and Programs Manager 3040 25th Street SE, Salem, OR 97302-1125 971-375-2357 alex.r.thomas@odav.oregon.gov
Human Resources Representative and Alternate Complaint Contact	Dan Klump, Human Resources, Oregon Department of Transportation 503-986-4011 dan.klump@odot.oregon.gov

ODAV does not maintain a separate equity-leader position because of its size. The Affirmative Action Representative performs that coordinating function with support from the Director, managers, and the agency's human resources representative.

Organizational Chart

Proposed Organization Chart 2027-29



Note: Shaded positions are proposed for elimination in 27-29.

Proposed organization for the 2027-29 biennium. Positions marked with an X are proposed for elimination in the Agency Request Budget.

Affirmative Action Policy Statement

ODAV provides equal employment opportunity and will not tolerate discrimination, workplace harassment, sexual harassment, sexual assault, or retaliation. Employment decisions will be based on job-related qualifications, merit, and the agency's operational needs, consistent with applicable law, collective bargaining agreements, veterans' preference requirements, and statewide policy.

ODAV will take affirmative steps to identify and reduce barriers in recruitment, selection, development, advancement, retention, and contracting. The agency will provide reasonable accommodation, maintain accessible processes, and make employment information available through channels that can reach qualified applicants from a broad range of communities and backgrounds.

Managers are held to a higher standard. They are expected to prevent and promptly address prohibited conduct, support equitable employment practices, complete required training, and document progress toward this plan. Every employee shares responsibility for maintaining a professional and respectful workplace.

Roles for Implementation

Roles and Responsibilities

Director and Executive Leadership

- Provide executive sponsorship, communicate expectations, and ensure that affirmative action and equal employment opportunity are integrated into agency decisions.
- Review progress at least annually and address barriers identified through workforce, recruitment, employee feedback, complaint, or contracting information.
- Ensure that manager performance evaluations include effectiveness in achieving affirmative action objectives as required by ORS 659A.012.
- Allocate reasonable staff time and resources needed to carry out the plan.

Managers and Supervisors

- Use job-related, structured, and consistently documented recruitment and selection practices.
- Support timely training, quarterly performance check-ins, employee development, cross-training, and succession planning.
- Promptly document and report concerns involving discrimination, workplace harassment, sexual harassment, sexual assault, or retaliation.
- Model respectful behavior and respond to workplace concerns without avoidable delay.
- Support outreach to COBID-certified firms and other qualified businesses when procuring applicable goods and services.

Affirmative Action Representative

- Coordinate implementation, monitoring, annual updates, and biennial reporting for this plan.
- Maintain a central implementation tracker for goals, measures, responsible parties, and completion dates.
- Serve as ODAV's primary designated individual for receiving reports under State HR Policy 50.010.01 and promptly coordinate with human resources.
- Review workforce and recruitment information in a manner that protects employee privacy and identifies potential barriers.
- Advise the Director and managers on policy changes, training, outreach, and corrective action needs.
- Coordinate communication of the plan and current complaint-reporting options to employees.

All ODAV Employees

- Treat coworkers, applicants, contractors, partners, and members of the public with dignity and respect.
- Complete required training and participate in performance check-ins and employee feedback activities.
- Report suspected prohibited conduct and cooperate with complaint and investigation processes.
- Support a workplace where differing perspectives and professional experiences can contribute to the agency's mission.

Accountability Mechanisms

- Affirmative action and respectful-workplace expectations are included in manager performance evaluations and the Director's biennial evaluation process.
- The Affirmative Action Representative will review the implementation tracker with the Director at least twice each fiscal year.
- ODAV will monitor training completion, recruitment documentation, quarterly check-in completion, employee survey results, retention, complaint processing, succession-plan updates, and contracting outreach.
- Results will be summarized in annual check-ins requested by DAS and in the next biennial progress report.

2025-27 Affirmative Action Progress Report

Reporting period: July 1, 2025 through July 2026. Because the biennium remains in progress, this section reports work completed or underway as of the date of this plan.

The 2025-27 plan established two broad goals:

1. Encourage diversity in aviation by supporting aviation education programs throughout Oregon.
2. Create a workplace that promotes diversity, equity, inclusion, and accessibility through leadership commitment and agency policies and practices aligned with the State of Oregon DEI Action Plan.

The prior plan did not assign numerical targets to most activities. This limited quantitative evaluation. The 2027-29 plan adds specific measures, owners, and reporting intervals.

Progress Toward Goal 1: Aviation Education and Workforce Development

ODAV expanded aviation education and workforce-development activity through partnerships, use of state-owned airport facilities, and public information resources. Work completed or underway includes:

- A partnership with Lane Community College supporting UAS education, wildfire-mitigation research, and integration of drone technology into academic programming.
- Continued use of Oakridge State Airport as a live training environment for advanced UAS operations and emergency-response training.
- Development of pilot education concepts connecting schools, nonprofit organizations, and aviation-industry partners.
- Development of an Aviation Education Portal and maintenance of statewide directories of flight schools, community-college programs, and high-school career and technical education programs.
- Public outreach concerning aviation safety, aircraft registration, airport development, and Oregon's aviation system.



Lane Community College aviation students at Oakridge State Airport.

These activities broaden awareness of aviation careers and create pathways into a field that has historically relied on specialized experience and personal exposure to aviation. ODAV will improve its tracking during 2027-29 so that future reports can identify participation, outreach reach, and resulting opportunities more precisely.

Progress Toward Goal 2: Inclusive and Respectful Workplace

ODAV continued to support a respectful workplace through leadership engagement, employee development, regular performance conversations, required training, and review of workforce information. Key practices included quarterly manager-employee check-ins, annual manager evaluations, open communication with agency leadership, access to statewide learning opportunities, and review of retention and workforce trends.

The agency also reviewed its complaint procedures during development of this plan. The 2027-29 plan replaces the prior 30-day, written-complaint language with the current statewide process, which allows verbal or written reports and covers discrimination, workplace harassment, sexual harassment, sexual assault, and retaliation.

Workforce Assessment

ODAV is a small agency. It had 15 FTE during the 2025-27 biennium and proposes 13 FTE in the 2027-29 Agency Request Budget. The July 2026 DAS Affirmative Action Plan Guide requires demographic tables for agencies with 100 or more employees. ODAV therefore uses a narrative assessment rather than publishing small-cell percentages that could identify individual employees or produce misleading comparisons.

Review of available workforce information showed limited representation among women, employees from minority racial and ethnic groups, and employees who voluntarily self-identify a disability. Small numbers mean that the addition or departure of one employee can materially change percentages. Voluntary self-identification data may also be incomplete. ODAV will use this information to guide outreach and barrier review, not to create quotas or make employment decisions based on protected status.

The agency's practical workforce challenges include a small number of vacancies, specialized aviation classifications, geographic and pay constraints, and limited internal promotional ladders. The next-biennium goals emphasize broader outreach, consistent selection practices, employee development, cross-training, and documentation.

Alignment with DEI and Strategic Plans

The Affirmative Action Plan, DEI Plan, and Strategic Plan serve related but distinct purposes. The Strategic Plan identifies the workforce and organizational capacity needed to operate airports, administer programs, improve resilience, communicate with Oregonians, and develop emerging-aviation initiatives. The DEI Plan establishes expectations for access, respectful engagement, and removal of barriers. This plan applies those commitments to employment, leadership accountability, complaint processes, employee development, and contracting.

The 2027-29 measures support strategic execution by improving recruitment quality, strengthening retention and succession planning, and ensuring that managers have clear, documented expectations. They also support Executive Order 22-11 by connecting leadership accountability and employee experience to specific agency actions.

Leadership Evaluation Report

ORS 659A.012 requires each state agency to include a manager's or supervisor's effectiveness in achieving affirmative action objectives as a key consideration in the evaluation of management personnel. ODAV implements this requirement through annual manager evaluations and the Director's biennial performance-evaluation process.

Manager evaluations	All ODAV managers are evaluated on maintaining a respectful and professional workplace, preventing and responding to discrimination and harassment, supporting equitable recruitment and employee development, completing required training, and applying agency policies consistently.
Documentation	The Director is responsible for completing and documenting manager evaluations in Workday. The agency retains evaluation completion information and will address any incomplete evaluation through the performance-management process.
Director evaluation	The Director is evaluated every two years through a process that includes input from employees, Oregon Aviation Board members, and external partners. The evaluation addresses organizational capacity, inclusive leadership, collaboration, transparency, and employee engagement.
Accountability	The Oregon Aviation Board Chair, in collaboration with the Governor's Office, is responsible for the Director's evaluation. The Director reviews managers' performance and progress toward this plan.

For 2027-29, each manager will have at least one written performance expectation tied to the measurable goals in this plan. The Affirmative Action Representative will provide the Director with a mid-biennium and end-of-biennium implementation summary for use in evaluations.

2027-29 Affirmative Action Plan

Overall goal: ODAV will maintain and strengthen a workplace that is welcoming, respectful, accessible, and free from discrimination, harassment, sexual harassment, sexual assault, and retaliation. The agency will use documented recruitment, selection, development, retention, complaint, and contracting practices to reduce barriers and support a qualified workforce capable of carrying out ODAV's mission.

The goals below are designed to be specific, measurable, and achievable for a 13-FTE agency. Measures apply when ODAV conducts the relevant activity during the biennium.

Goal 1: Equitable Recruitment and Selection

Activities	• Review each competitive recruitment for clear, inclusive, and job-related language. • Use structured interview questions, standardized scoring criteria, and documented selection decisions. • For hard-to-fill positions or classifications with identified underrepresentation, use at least three documented outreach channels, such as educational institutions, professional associations, community organizations, workforce programs, or aviation-industry networks. • Provide hiring-panel members with current equitable-hiring guidance before interviews. • Review applicant-flow and recruitment results when reliable data are available.
Measures and targets	• 100 percent of competitive recruitments use a reviewed job announcement, structured questions, standardized evaluation criteria, and a retained selection record. • 100 percent of applicable hard-to-fill or underrepresentation-focused recruitments document at least three outreach channels or a written explanation of why fewer channels were available. • 100 percent of interview panel members receive equitable-hiring guidance before participating. • Recruitment results are reviewed at least annually by the Director and Affirmative Action Representative.
Assigned responsibility	Hiring manager; Affirmative Action Representative; human resources representative; Director for final accountability.
Reporting frequency	Tracked for each recruitment; reviewed semiannually; summarized annually.
Expected outcome	Broader and more qualified applicant pools, more consistent selection decisions, and better documentation of the agency's merit-based hiring process.

Goal 2: Respectful Workplace, Training, and Accountability

Activities	• Communicate current complaint contacts and State HR Policy 50.010.01 to all employees and whenever designated contacts change. • Ensure completion of required discrimination, harassment, respectful-workplace, and manager training. • Conduct quarterly performance check-ins and an annual employee engagement or climate survey. • Develop and communicate an action plan within 60 days after reviewing annual survey results. • Review complaint handling and follow-up with human resources to confirm policy compliance.
Measures and targets	• 100 percent of employees complete required annual training by the assigned deadline. • 100 percent of new employees receive the policy and complaint-contact information during onboarding. • At least 90 percent agencywide completion of required quarterly performance check-ins. • One employee engagement or climate survey each fiscal year, with a documented leadership review and action plan within 60 days. • All complaints are documented, routed, and processed under current statewide policy.
Assigned responsibility	Director; managers; Affirmative Action Representative; human resources representative.
Reporting frequency	Training and check-ins reviewed quarterly; survey and complaint-process review annually.
Expected outcome	Clear workplace expectations, reliable reporting options, stronger employee confidence, and prompt response to concerns.

Goal 3: Employee Development, Retention, and Succession

Activities	• Discuss career interests, training needs, and development opportunities during quarterly check-ins. • Offer cross-training, job shadowing, developmental assignments, conferences, or other relevant learning opportunities within available resources. • Identify critical functions and document backup coverage and knowledge-transfer needs. • Update the succession plan annually and align it with the Continuity of Operations Plan and Strategic Plan. • Review turnover, exit information, and positions with recurring recruitment or retention challenges.
Measures and targets	• 100 percent of employees are offered at least one job-relevant development or cross-training opportunity each fiscal year. • By June 30, 2029, every critical agency function has a documented primary and backup coverage plan, or a documented mitigation where staffing makes backup coverage impracticable. • Succession plan reviewed and submitted according to statewide expectations each year. • Retention and exit information reviewed at least annually, with actions documented when a recurring issue is identified.
Assigned responsibility	Director; managers; employees; Affirmative Action Representative.
Reporting frequency	Quarterly through check-ins; succession and retention review annually.
Expected outcome	Improved continuity, stronger internal capability, clearer development pathways, and reduced operational risk from turnover.

Goal 4: Equitable Contracting Outreach and Data

Activities	• Track the number and value of applicable construction, service, and personal-service contracts and identify COBID certification status of prime contractors when available. • Include COBID outreach or notice in applicable solicitations and market-engagement activities. • Conduct or participate in at least one COBID, DBE, or small-business outreach activity each fiscal year. • Where federal funds are involved, distinguish state COBID reporting from FAA DBE or ACDBE requirements and track subcontracting information when required and available. • Review insurance, bonding, experience, and packaging requirements for unnecessary barriers while preserving safety, legal, and federal grant requirements.
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Measures and targets	• 100 percent of applicable solicitations document COBID outreach or a written explanation of why outreach was not applicable. • Contract count and value by applicable certification category are reviewed and reported annually. • At least one outreach or market-engagement activity is completed each fiscal year. • Any identified barrier that can be modified without compromising safety, law, or federal requirements is addressed in the next applicable solicitation.
Assigned responsibility	Planning and Programs Manager/COBID lead; procurement staff; project managers; Director.
Reporting frequency	Tracked for each applicable solicitation; reviewed annually.
Expected outcome	Better information about contracting results, broader awareness of ODAV opportunities, and fewer avoidable barriers for qualified firms.

Implementation Schedule

Period	Primary actions	Lead	Evidence retained
Jul.-Sep. 2027	Establish central tracker; confirm complaint contacts; review hiring templates; set workforce and contracting baselines.	AAR and managers	Tracker, contact notice, templates, baseline memo
FY 2028	Implement goals; complete training; conduct outreach; survey employees; update succession plan; complete semiannual reviews.	Assigned leads	Training reports, recruitment files, survey action plan, succession plan
Jul.-Dec. 2028	Mid-biennium review; identify barriers; adjust outreach, training, or development activities as needed.	Director and AAR	Mid-biennium summary and action items
Jan.-Jun. 2029	Complete end-of-biennium review and prepare progress information for the next plan.	Director and AAR	Final implementation summary and supporting records

Complaint and Reporting Options

ODAV follows State HR Policy 50.010.01, Discrimination and Harassment Free Workplace, and State HR Policy 10.025.01, Human Resources Investigation Practices. These statewide policies govern reports and investigations under this plan. Any older agency procedure is used only to the extent it is consistent with current statewide policy.

Designated Contacts

Primary designated individual	Kristen Forest, Affirmative Action Representative and Business and Finance Manager 503-378-2522 kristen.r.forest@odav.oregon.gov
Alternate designated individual	Dan Klump, Human Resources, Oregon Department of Transportation 503-986-4011 dan.klump@odot.oregon.gov
Additional internal reporting options	Kenji Sugahara, Director; any ODAV manager or supervisor; the agency human resources representative; or the DAS Chief Human Resources Office.

What May Be Reported

An employee, applicant, volunteer, intern, board or commission member, contractor, or other person working with the agency may report conduct they believe is discrimination, workplace harassment, sexual harassment, sexual assault, retaliation, or another violation covered by State HR Policy 50.010.01. A person may report conduct they experienced, witnessed, or learned about.

How to Report

- A report may be verbal or written. No specific form is required.
- A report should be made to the primary designated individual or alternate. It may also be made to an immediate supervisor, another manager, human resources, the Director, or DAS CHRO.
- When available, the report should identify the people involved, witnesses, what occurred, when it occurred, and the remedy requested. A report will still be accepted if some information is unavailable.
- A report should be made within five years of the occurrence. A late report does not remove the agency's responsibility to assess and respond.

Intake, Processing, and Timeframes

1. Any supervisor, manager, or agency representative who receives a report will document it and promptly notify the primary designated individual or alternate.
2. The designated individual or alternate will provide the current statewide policy to the person making the report, maintain appropriate intake records, and promptly coordinate with human resources.
3. The agency and human resources will assess immediate safety, retaliation, conflict-of-interest, confidentiality, and interim-measure needs. When an investigation is necessary, the agency will make an effort to assign an investigator within seven business days.
4. The agency will make reasonable efforts to begin the investigatory process within 30 calendar days after becoming aware of a potential disciplinary issue and to complete an agency investigation within 120 calendar days. If the process exceeds 120 days, the complainant may request status updates every 30 days. Investigations conducted by DAS, DOJ, a partner agency, or an outside investigator will be completed as timely as practicable, with a six-month completion target under statewide policy.

5. The agency will notify the complainant, respondent, and interviewed witnesses when the investigation is closed, subject to privacy, labor, and legal requirements. Timely and appropriate action will be taken when allegations are substantiated.
6. For workplace-harassment reports, ODAV will complete follow-up contacts every three months for 12 months unless the employee signs a waiver, as required by State HR Policy 50.010.01.

Confidentiality and Nonretaliation

Complaints and investigations will be handled discreetly and confidentially to the extent consistent with operational needs, state and federal law, collective bargaining agreements, and statewide policy. Retaliation for making a report, participating in an investigation, or opposing prohibited conduct is not tolerated and should be reported immediately.

External Options

Nothing in the internal process prevents a person from using an applicable collective bargaining agreement or filing with the [Oregon Bureau of Labor and Industries](#) or the [U.S. Equal Employment Opportunity Commission](#). External filing deadlines and procedures may differ from ODAV's internal process, so individuals should contact those agencies promptly.

Succession Plan

ODAV has a succession plan aligned with the agency's Continuity of Operations Plan and Strategic Plan. The plan is reviewed annually and submitted according to statewide expectations. During 2027-29, ODAV will strengthen the plan by identifying critical functions, documenting primary and backup coverage, and linking employee development and cross-training to continuity needs.

Because the agency is small and has specialized positions, some functions may not have a fully redundant in-house backup. Where that occurs, the succession plan will identify a practical mitigation, such as cross-agency support, contracted expertise, documented procedures, or prioritized knowledge transfer.

Contracting Report

As of July 2026, ODAV had not awarded a prime construction, service, or personal-service contract during the 2025-27 biennium to a certified minority- or woman-owned business enterprise. ODAV will preserve the underlying procurement records and supplement this report with contract count and value data if requested by DAS during review.

Several factors affect participation in airport work. Aviation projects often require specialized airport experience, FAA compliance, insurance, bonding, safety qualifications, and financial capacity. Some project locations and scopes attract a limited number of firms. These requirements can be necessary, but ODAV will review them to distinguish legitimate safety and grant requirements from avoidable barriers.

For 2027-29, ODAV will track applicable contract count and value, document COBID outreach, participate in at least one outreach or market-engagement activity each fiscal year, and distinguish state COBID reporting from federal DBE and ACDBE requirements. ODAV will also review subcontracting information when federal requirements or contract terms make it available.

Contracting references: ORS 659A.015; 49 CFR Part 26 for federally assisted DBE requirements; and 49 CFR Part 23 for airport-concession DBE requirements where applicable.

Appendices

Appendix A: State Policies and Resources

- [Affirmative Action Policy \(ORS 182.100\)](#)
- [Policy of affirmative action and fair and equal employment opportunities and advancement \(ORS 243.305\)](#)
- [Unlawful Discrimination in Employment, Public Accommodations and Real Property Transactions; Administrative and Civil Enforcement \(ORS 659A.012, 659A.015\)](#)
- [Statewide Diversity, Equity, and Inclusion Action Plan](#)
- [Executive Order 22-11](#)
- [ADA and Reasonable Accommodation Policy \(Statewide policy 50.020.10\)](#)
- [Discrimination and Harassment Free Workplace \(Statewide policy 50.010.01\)](#)
- [Duties of Administrator \(ORS 240.145\)](#)
- [Rules Applicable to Management Services \(ORS 240.250\)](#)
- [Recruitment and Selection \(Statewide policy 40.010.02\)](#)
- [Veterans Preference in Public Employment \(ORS 408.230\)](#)
- [Equal Opportunity and Affirmative Action Rule \(105.040.0001\)](#)
- [Affirmative Action Plan Guide, revised July 6, 2026](#)
- [State HR Policy 50.010.01, Discrimination and Harassment Free Workplace](#)
- [State HR Policy 10.025.01, Human Resources Investigation Practices](#)
- [Statewide Human Resource Policies](#)

Appendix B: Federal Policies and Resources

- [Age Discrimination in Employment Act of 1967 \(ADEA\)](#)
- [Disability Discrimination Title I of the Americans with Disability Act of 1990](#)
- [Genetic Information Discrimination Title II of the Genetic Information Nondiscrimination Act of 2008\(GINA\)](#)
- [Equal Pay and Compensation Discrimination Equal Pay Act of 1963](#)
- [Title VII of the Civil Rights Act of 1964](#)
 - National Origin Discrimination
 - Discrimination
 - Race/Color Discrimination
 - Religious Discrimination
 - Sex-Based Discrimination
 - Sexual Harassment
- [Retaliation Title VII of Civil Agency Affirmative Action Policy](#)
- [Executive Order 11246](#)

Appendix C: Agency and Aviation-Specific Resources

- [FAA Disadvantaged Business Enterprise and Airport Concessions Disadvantaged Business Enterprise Program](#)
- [49 CFR Part 26, Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs](#)
- [49 CFR Part 23, Participation of Disadvantaged Business Enterprises in Airport Concessions](#)
- [ODAV Strategic Plan.](#)
- [ODAV Diversity, Equity, and Inclusion Plan](#)

APPENDIX D- AGENCY DOCUMENTATION IN SUPPORT OF ITS AFFIRMATIVE ACTION PLAN

- Complaint Intake and Routing Checklist (p. 21)
- Harassment-Free Workplace Inappropriate Behavior Policy (p.22)

Appendix D: Complaint Intake and Routing Checklist

Step	Required action	Responsible party
1	Receive verbal or written report. Listen, document available facts, and avoid promising complete confidentiality.	Any manager, supervisor, designated contact, or HR
2	Promptly notify Kristen Forest or Dan Klump. If either has a conflict, contact the Director or DAS CHRO.	Person receiving report
3	Provide State HR Policy 50.010.01 to the reporting employee and open the required complaint record.	Designated individual or alternate
4	Coordinate with human resources; assess safety, retaliation, interim measures, and investigator assignment.	Designated contact, HR, and Director as appropriate
5	Track milestones, communications, status updates, evidence, findings, closure notices, and corrective action.	HR/investigator and designated contact
6	Complete required three-month follow-up contacts for 12 months after a workplace-harassment report unless waived.	Designated contact and HR
7	Retain records under applicable law, statewide policy, records schedules, and confidentiality requirements.	ODAV and HR

This checklist is a practical routing aid. Current statewide policy and applicable law control if there is a conflict.

ODAV Discrimination and Harrassment-Free Workplace Policy



EFFECTIVE DATE 7/01/2026	NUMBER ODAV - 010
SUPERCEDES 12/29/2025	PAGE NUMBER 1 of 6
APPROVED SIGNATURE	

PURPOSE The Oregon Department of Aviation (ODAV) is committed to maintaining a workplace that is respectful, professional, inclusive, and free from unlawful discrimination, harassment, retaliation, and inappropriate workplace behavior.

ODAV prohibits discrimination and harassment in all aspects of employment and is committed to providing a workplace where employees, applicants, interns, volunteers, contractors, customers, visitors, and members of the public are treated with dignity and respect.

This policy establishes employee expectations, defines prohibited conduct, and outlines responsibilities for preventing, reporting, and responding to discrimination and harassment.

Applicability

This policy applies to:

- All Oregon Department of Aviation employees;
- Job applicants;
- Temporary employees;
- Volunteers;
- Interns;
- Contractors and consultants;
- Members of boards and commissions acting on behalf of the Department; and
- Other individuals conducting business with or visiting the Department.

Employees are expected to comply with this policy while conducting agency business, whether in the workplace, while traveling, attending training or conferences, participating in agency-sponsored events, or communicating through electronic systems or social media used for work purposes.

References

This policy is intended to comply with applicable federal and Oregon laws, including but not limited to:

- State HR Policy 50.010.01 – Discrimination and Harassment Free Workplace
- ORS Chapter 659A
- ORS 240.086
- ORS 240.145
- ORS 240.250
- ORS 243.317
- Title VII of the Civil Rights Act of 1964
- Americans with Disabilities Act
- Rehabilitation Act of 1973
- Age Discrimination in Employment Act

Policy

A. Equal Employment Opportunity

ODAV provides equal employment opportunities and prohibits discrimination based on any characteristic protected by federal or Oregon law.

Protected characteristics include, but are not limited to:

- Race
- Color
- Religion
- National origin
- Sex
- Pregnancy
- Sexual orientation
- Gender identity
- Gender expression
- Marital status
- Age
- Disability
- Veteran status
- Genetic information
- Protected leave
- Union membership or lawful union activity
- Any other status protected by law.

This policy applies to all employment practices, including recruitment, hiring, assignments, promotions, compensation, benefits, training, discipline, and separation from employment.

B. Harassment-Free Workplace

ODAV is committed to maintaining a workplace free from unlawful harassment.

Harassment includes unwelcome conduct based upon a protected characteristic that has the purpose or effect of:

- creating an intimidating, hostile, or offensive work environment;
- interfering with an individual's work performance; or
- adversely affecting an individual's employment opportunities.

Harassment may be verbal, physical, visual, written, or electronic.

C. Sexual Harassment

Sexual harassment is a form of unlawful harassment and includes unwelcome sexual advances, requests for sexual favors, or other verbal, physical, visual, or electronic conduct of a sexual nature when:

1. Submission to the conduct is made explicitly or implicitly a condition of employment;
2. Submission to or rejection of the conduct is used as the basis for employment decisions; or
3. The conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment or unreasonably interfering with an individual's work performance.

D. Management Responsibilities

Managers and supervisors are responsible for maintaining a respectful workplace and are held to a higher standard of conduct.

Managers and supervisors shall:

- Model professional and respectful behavior.
- Take reasonable steps to prevent discrimination and harassment.
- Promptly report suspected violations of this policy.
- Cooperate with investigations.
- Take appropriate corrective action when necessary.
- Prevent retaliation against individuals who make reports or participate in investigations.

Failure to fulfill these responsibilities may result in disciplinary action, up to and including dismissal.

Guidelines

Examples of conduct prohibited under this policy include, but are not limited to:

Physical Conduct

- Unwelcome touching
- Blocking or restricting movement
- Invading personal space
- Physical intimidation
- Assault or threats of violence

Verbal Conduct

- Slurs
- Derogatory comments
- Offensive jokes
- Name-calling
- Mocking accents, disabilities, or protected characteristics
- Repeated unwelcome comments of a sexual nature

Visual Conduct

- Offensive posters
- Pictures
- Screensavers
- Cartoons
- Written messages
- Graffiti

Electronic Conduct

- Offensive emails
- Text messages
- Instant messages
- Social media posts
- Online harassment
- Sharing inappropriate images or videos
- Offensive comments made during virtual meetings

Bullying and Inappropriate Conduct

Examples include:

- Repeated intimidation
- Humiliation
- Deliberate exclusion from work activities
- Threatening behavior
- Abusive supervision
- Repeated conduct that undermines an employee's ability to perform assigned work.

Non-Retaliation

ODAV strictly prohibits retaliation against any individual who:

- Reports discrimination or harassment;
- Participates in an investigation;
- Serves as a witness;
- Requests an accommodation; or
- Opposes conduct reasonably believed to violate this policy.

Retaliation is a serious violation of this policy and may result in disciplinary action up to and including dismissal.

Grievance/Complaint Procedure

What May Be Reported

An employee, applicant, volunteer, intern, board or commission member, contractor, or other person working with the agency may report conduct they believe is discrimination, workplace harassment, sexual harassment, sexual assault, retaliation, or another violation covered by State HR Policy 50.010.01. A person may report conduct they experienced, witnessed, or learned about.

How to Report

- A report may be verbal or written. No specific form is required.
- A report should be made to the primary designated individual or alternate. It may also be made to an immediate supervisor, another manager, human resources, the Director, or DAS CHRO.
- When available, the report should identify the people involved, witnesses, what occurred, when it occurred, and the remedy requested. A report will still be accepted if some information is unavailable.
- A report should be made within five years of the occurrence. A late report does not remove the agency's responsibility to assess and respond.

Intake, Processing, and Timeframes

1. Any supervisor, manager, or agency representative who receives a report will document it and promptly notify the primary designated individual or alternate.
2. The designated individual or alternate will provide the current statewide policy to the person making the report, maintain appropriate intake records, and promptly coordinate with human resources.
3. The agency and human resources will assess immediate safety, retaliation, conflict-of-interest, confidentiality, and interim-measure needs. When an investigation is necessary, the agency will make an effort to assign an investigator within seven business days.
4. The agency will make reasonable efforts to begin the investigatory process within 30 calendar days after becoming aware of a potential disciplinary issue and to complete an agency investigation within 120 calendar days. If the process exceeds 120 days, the complainant may request status updates every 30 days. Investigations conducted by DAS, DOJ, a partner agency, or an outside investigator will be completed as timely as practicable, with a six-month completion target under statewide policy.
5. The agency will notify the complainant, respondent, and interviewed witnesses when the investigation is closed, subject to privacy, labor, and legal requirements. Timely and appropriate action will be taken when allegations are substantiated.
6. For workplace-harassment reports, ODAV will complete follow-up contacts every three months for 12 months unless the employee signs a waiver, as required by State HR Policy 50.010.01.

Confidentiality and Nonretaliation

Complaints and investigations will be handled discreetly and confidentially to the extent consistent with operational needs, state and federal law, collective bargaining agreements, and statewide policy. Retaliation for making a report, participating in an investigation, or opposing prohibited conduct is not tolerated and should be reported immediately.

External Options

Nothing in the internal process prevents a person from using an applicable collective bargaining agreement or filing with the Oregon Bureau of Labor and Industries or the U.S. Equal Employment Opportunity Commission. External filing deadlines and procedures may differ from ODAV's internal process, so individuals should contact those agencies promptly.