Report on the Number of Employment Complaints Filed with the Office of Equity and Racial and Social Justice (OERSJ)

November 2025



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I. Executive Summary

This report summarizes the number of employment complaints filed with the Civil Rights Program in the Office of Equity and Racial and Social Justice (OERSJ), as required by King County Code 3.12D.020¹ for the period of January 1, 2025, through October 31, 2025.

According to Civil Rights investigatory files from January 1st through October 31st, 2025, OERSJ received 240 inquiries. Of the 240 inquiries received, 214 were outside of OERSJ's jurisdiction (OOJ). Of the 26 inquiries that were within OERSJ's jurisdiction, 16 were related to King County Employment. Inquiries within jurisdiction either were filed as formal complaints and progressed to an investigation, were referred to another agency, or did not advance because the potential complainant chose not to proceed.

In 2025, OERSJ managed a total of ten (10) employment complaints. Six (6) complaints were newly filed in 2025, while four were carried over from 2024.

Of the 10 employment cases filed:

- Five were closed
- Three remained in progress
- Two were placed on hold

The bases for these complaints included race, age, disability, color, gender, ancestry, national origin, sexual orientation, and sex.

This report, as required, provides:

- 1. The number of employment complaints filed with the OERSJ;
- 2. The basis or bases of the complaint;
- 3. The number of investigations into unfair employment practices in the reporting year; and
- 4. The number of findings that reasonable cause exists to believe that an unfair employment practice occurred.

The Civil Rights Program enforces the County's Fair Employment Practices Ordinance outlined in King County Code pursuant to its duties under KCC 2.16.025 (F).²

II. Background

Department Overview – Office of Equity and Racial and Social Justice (OERSJ)

Located in the Executive Office, OERSJ leads countywide efforts to embed equity and racial and social justice outcomes into King County programs and services. The Civil Rights Program is a core function of OERSJ, charged with:

a. Receiving complaints, investigating potential violations and enforcing the County's antidiscrimination ordinances³, including Fair Contracting (KCC 12.17)⁴, Fair Employment Practices

¹ King County Code 3.12D.020 [LINK]

² King County Code 2.16.025 (F) [LINK]

³ The County's Antidiscrimination ordinances include KCC 2.15, 3.12D, 12.16, 12.17, 12.18, 12.20, and 12.22, and KCC 6.27A.120 and 7.08.080.

⁴ King County Code 12.17 Discrimination in Contracting [LINK]

- (KCC 12.18)⁵, Open Housing (KCC 12.20),⁶ Discrimination in Places of Public Accommodation (KCC 12.22)⁷, and the Citizenship and Immigration Status Ordinance (KCC 2.15);⁸
- b. Assisting departments in complying with the Americans with Disabilities Act of 1990, the federal Rehabilitation Act of 1973, Section 504, and other legislation and rules regarding access to county programs, facilities, and services for people with disabilities;
- c. Serving as the County's Americans with Disabilities Act Title II coordinator relating to public access;
- d. Providing staff support to the County's Human and Civil Rights Commission;
- e. Serving as the County's federal Civil Rights Act Title VI coordinator; and,
- f. Coordinating County responses to federal Civil Rights Act Title VI issues and investigating complaints filed under Title VI.

In addition to its statutory duties above, the Civil Rights program engages in the development of policy and programs that seek to advance equity, racial and social justice.

Key Historical Conditions

King County's efforts to ensure fair employment practices have developed over more than four decades. In 1985, Ordinance 7430 established protections against employment discrimination based on race, color, age, gender, marital status, sexual orientation, religion, ancestry, national origin, disability, or the use of a service animal. This ordinance provided the County's first comprehensive legal measures to prevent workplace discrimination and promote equal access to employment.

In September 2001, Ordinance 14199 created the King County Office of Civil Rights (OCR) within the Department of Executive Services. ¹⁰ OCR was responsible for enforcing anti-discrimination protections, investigating complaints, and providing staff support to the Civil Rights Commission. This formalized the County's approach to addressing workplace discrimination and created an ongoing mechanism for accountability.

King County's fair employment protections have developed through successive legislative, policy, and organizational actions. The table below highlights key ordinances, charter amendments, and administrative changes from 1985 to 2025 that have shaped the County's civil rights enforcement and fair employment practices.

Table 1: Historical Development of Fair Employment Practices in King County

Date	Action	Description
December 1985	Ordinance 7430: Fair Employment Practices	Enacted to establish fair employment standards and prohibit discrimination in employment based on race, color, age, gender, marital status, sexual orientation, religion, ancestry, national origin,

⁵ King County Code 12.18 Fair Employment Practices [LINK]

⁶ King County Code 12.20 Open Housing [LINK]

⁷ King County Code 12.22 Discrimination in Places of Public Accommodation [LINK]

⁸ King County Code 2.15 Citizen and Immigration Status [LINK]

⁹ Ordinance 7430 [LINK]

¹⁰ Ordinance 14199 [LINK]

Date	Action	Description
		disability, or the use of a service animal by an individual with a disability. The ordinance applies to all employees within King County and was designed to ensure equal access to employment opportunities and protection from workplace discrimination based on these protected characteristics.
December 2019	Ordinance 19047: Reporting of Workplace Discrimination and Harassment ¹¹	Adopted to strengthen procedures for reporting and addressing workplace discrimination and harassment complaints within King County government. The ordinance clarified reporting channels and accountability measures for County employees and departments.
November 2020	Charter Amendment: Expanded Anti- Discrimination Protections 12	King County voters approved a charter amendment (Charter section 840). Ordinance 19135 more broadly prohibits discrimination based on family caregiver, military or veteran status in county employment and in county contracting with nongovernmental entities. 13
September 2025	Ordinance 19977: Updating Anti-discrimination Text and Protections	Ordinance 19977 added two protected classes: "status as a family caregiver" and "military status as a veteran who was honorably discharged or who was discharged solely as a result of the person's sexual orientation or gender identity or expression" throughout the antidiscrimination-related text in King County Code and made technical corrections.

Together, these milestones demonstrate the County's ongoing efforts to prevent workplace discrimination, ensure equitable opportunities, and maintain accountability across its workforce.

Current Context

The program is staffed by three full-time employees (FTEs), including a Program Manager and two FTEs dedicated to investigations. The investigators serve as impartial fact finders and do not represent either the complainant or the responding party.

Jurisdictional Scope

The Civil Rights program is authorized to investigate employment complaints strictly in accordance with King County Code. OERSJ has jurisdiction only in cases where a complaint involves:

1. King County Government, including programs, facilities, and services operated by the County.

¹¹ Ordinance 19047 [LINK]

¹² King County Charter, Section 840 [LINK]

¹³ Ordinance 19135 [LINK]

- 2. Employers, housing providers, businesses in unincorporated areas of King County (UKC).
- 3. Any other areas of King County where the County is acting as an employer or contractor or operating a place of public accommodation.

Jurisdiction for Complaints Filed under KCC 12.18.013

Jurisdiction for employment matters extends to King County acting as an employer, and to other employers, labor organizations, and employment agencies acting in Unincorporated King County (UKC).

Criteria for Employers in UKC under KCC 12.18.020 (G)

- 1. **Minimum Employee Threshold:** The employer must employ eight (8) or more people.
- 2. **Exclusions:** Religious or sectarian organizations not organized for private profit, as well as governmental bodies other than King County are not under OERSJ's jurisdiction to investigate.

Complaint Filing Requirements and Deadline under K.C.C 12.18.040

A complaint alleging an unfair employment practice may be brought forward by the following parties:

- 1. Any aggrieved person.
- A state, local or federal agency concerned with discrimination in employment, including OERSJ, if the agency has reason to believe that an unfair employment practice has been or is being committed.
- 3. Any labor organization that has reason to believe that an unfair employment practice has been or is being committed.

Additionally, an employment complaint must be filed with OERSJ within two years from the date of the alleged unfair employment practice, or within two years of when the charging party should have reasonably become aware of the occurrence.

Agency Collaboration and Community Referrals

From January 1st, 2025, to October 31st, 2025, OERSJ received 240 inquiries. Most inquiries (89 percent) fell outside OERJS's jurisdiction (OOJ). In these cases, OERSJ investigators follow up promptly to connect individuals with the appropriate agency.

Over the past year, OERSJ's Civil Rights Program has strengthened partnerships both internally and externally, working closely with King County investigatory bodies such as the Ombudsman Office, Department of Human Resources (DHR), Workforce Equity, Sheriff's Office of Law Enforcement Oversight (OLEO), Prosecuting Attorney's Office (PAO), Finance and Business Operations Division (FBOD), and departments including Adult and Juvenile Detention (DAJD), Natural Resources and Parks (DNRP), Local Services (DLS), Department of Executive Services (DES), Public Health Seattle-King County (PHSKC), and King County Metro Transit Department (MTD).

Externally, the Civil Rights program has made connections with the Washington State Human Rights Commission, King County Housing Authority (KCHA), and King County Dispute Resolution Center. These connections have deepened OERSJ's understanding of each partner's scope, authority, and processes to ensure coordinated responses, maximize resources, and reduce duplication. This has improved clarity and access for those seeking OERSJ's services.

Report Methodology:

Civil Rights investigators leveraged technology to track cases, including Cognito Forms (web-based form
and SharePoint (Microsoft 365 tool) to provide the data included in this report.

Civil Rights Program Investigation Process

The Civil Rights Program receives inquiries through multiple channels, including phone, email, letter, online submission, and in-person contact. The Cognito Inquiry Form collects information related to each complaint and allows individuals to voluntarily submit demographic details. This information helps OERSJ understand the nature of incoming complaints, identify emerging patterns, and guide targeted education and outreach efforts. To enhance responsiveness and improve case management, the program has established standardized workflows that ensure consistent processing of inquiries. These workflows also guarantee that investigators follow up on all submissions and that individuals receive immediate confirmation that their inquiry has been received.

Key Stages of OERSJ's Investigation Process

- 1. Inquiry Submission and Acknowledgment Once an inquiry is submitted, the inquirer receives an email confirming receipt and indicating that a member of the Civil Rights team will respond within two to three business days.
- 2. Preliminary Jurisdiction Review The submission is reviewed by an investigator to determine whether the matter falls within OERSJ's jurisdiction. During this preliminary review, the investigator collects critical information to identify the type of alleged violation and the complainant's ¹⁴ protected class. If the matter is determined to be outside OERSJ's jurisdiction, the complainant is notified in writing and referred to other appropriate resources.
- 3. Intake Stage For inquiries that fall within OERSJ's jurisdiction, investigators gather detailed information. The complainant receives an information packet outlining the steps of the investigation and OERSJ procedures prior to filing a formal complaint, a case file is opened, an investigation plan is initiated, and a draft complaint is prepared. Investigators assess whether OERSJ is the most appropriate venue for reviewing the complaint or whether it should be addressed by another agency.
- 4. Complaint Filing At this stage, the complainant signs and files the complaint with OERSJ. The responding party¹⁵ is then served with the complaint and provided with information about the program, what to expect during the investigation, their responsibilities, and OERSJ's role. The investigation begins once the responding party submits a response to the allegations.
- 5. Investigation and/or Alternative Dispute Resolution (ADR) At this stage, OERSJ aims to resolve the complaint at the lowest possible level by exploring ways for the parties to reach a mutually satisfactory resolution. In some cases, mediation or other alternative dispute resolution methods may be used to resolve the matter before completing a full investigation. If the parties do not agree to a pre-settlement, a formal investigation proceeds. Investigators may interview the complainant, the responding party, and any relevant witnesses; collect and review documents, emails, or other evidence; and conduct site visits if necessary. If another agency is investigating the matter, OERSJ may place its investigation on hold until the results of that investigation are available.

¹⁴ A "Complainant" or "Charging party" means any person alleging an unfair employment practice under this chapter by filing a complaint with the office of equity and racial and social justice.

¹⁵ A "Responding Party" or "Respondent" means any person who is alleged to or found to have committed an unfair employment practice prohibited by this chapter.

6. Concluding the Investigation and Findings - A case can be closed for several reasons, including resolution through pre-settlement, completion of another agency's investigation, withdrawal of the complaint by the complainant, or non-responsiveness by the complainant. If the investigation proceeds to conclusion, it may result in a No Reasonable Cause finding or a Reasonable Cause finding, which could include post-settlement agreements and/or an official Order from OERSJ.

At the conclusion of the investigation, an investigative report or post-settlement summary is completed. For employment-related complaints resulting in a No Reasonable Cause finding, the complainant may request reconsideration within thirty days of receiving notice of the No Reasonable Cause finding. Additionally, both parties have the ability to appeal to the County's hearing examiner.

Throughout each stage of the process, the complainant and the responding party receive updates and maintain communication with the investigator managing the case.

III. Report Requirements

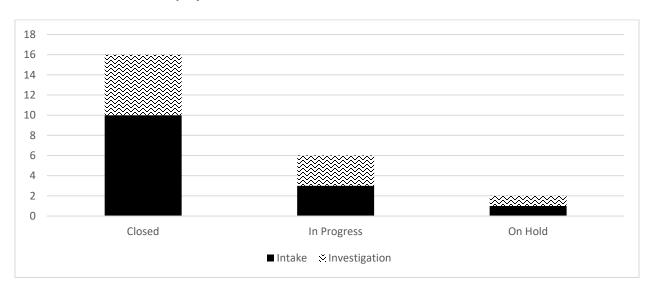
2025 Employment Data

From January 1st, 2025, to October 31st, 2025, OERSJ received 240 inquiries. The table below shows the inquiries received by alleged violation type. Most inquiries (214 or 89 percent) fell outside OERSJ's jurisdiction.

As of October 31st, 2025, Civil Rights Investigators processed a total of 24 Employment-related cases, which includes 16 inquiries received this year and eight cases from previous years:

- 14 cases (58 percent) were in the intake stage during which the investigators gather additional information and a complaint is prepared. Of these employment cases:
 - o Ten (10) were closed and did not advance to the investigation stage.
 - Three (3) were in progress
 - o One (1) was on hold
- 10 cases (42 percent) advanced to the investigation process, with a signed complaint on file:
 - o Five (5) were closed
 - Three (3) were in progress
 - o Two (2) were on hold

Table 2: Status of 2025 Employment Cases



Additional details of the ten (10) employment complaints filed between 2024 and 2025 are outlined in Table 4.

Table 3: Employment Cases Filed with OERSJ's Civil Rights Program

Case Name	Respondent	Complaint Filing Date	Date Closed	Basis for alleged Discrimination	Resolution
2024-J-A- EMP-318	King County Public Health Seattle-King County (PHSKC)	11/26/2024	6/20/2025	Race; Age	No Reasonable Cause
2024-J-S- EMP-257	King County Metro Transit Department (MTD)	11/26/2024	6/16/2025	Disability; Race; Color; Gender	No Determination. Charging Party withdrew complaint.
2024-A-Y- EMP-262	King County Department of Human Resources (DHR) - Central Employee Services (CES)	11/26/2024	6/9/2025	Disability	No Reasonable Cause
2025-M-M- EMP-340	King County Dept of Local Services (DLS)	3/3/2025	10/9/2025	Disability; Race; Ancestry	No Reasonable Cause

Case Name	Respondent	Complaint Filing Date	Date Closed	Basis for alleged Discrimination	Resolution
2024-M-C- EMP-376	King County Dept of Public Defense (DPD)	3/19/2025	7/9/2025	Race; Sex	No Reasonable Cause
2024-L-D- EMP-327	King County Department of Natural Resources and Parks (DNRP)	4/15/2024	Open	Disability	Pending Investigation
2024-C-T- EMP-338	King County Metro Transit Department (MTD)	2/5/2025	Open	Disability; Age; Race	Pending Investigation
2025-P-K- EMP	King County Public Health Seattle-King County (PHSKC)	4/22/2025	On hold	Sex, Sexual Orientation; Age	Pending Investigation
2025-K-O- EMP-434	King County DES: King County International Airport (KCIA)	6/25/2025	Open	Race	Pending Investigation
2025-S-N- EMP-84	DNRP-Wastewater Treatment Division (WTD)	09/12/2025	On hold	Race; National Origin	Pending Investigation

Legend:

- **Open**: Indicates there is an active investigation in progress. A determination or final resolution has not yet been made.
- On Hold: Parallel Investigation Procedure is in effect. A complaint has been filed with OERSJ, but no further action is being taken at this time because another simultaneous investigation is ongoing.
- **Pending Investigation**: The investigation is currently in progress, with the matter still being examined and no final findings or resolution has been reached yet.
- **Reasonable Cause**: Indicates there is sufficient evidence to support the discrimination allegations raised in the complaint.
- **No Reasonable Cause**: Indicates there is insufficient evidence to support the discrimination allegations raised in the complaint.