

**COMMUNITY ACTION PARTNERSHIP
OF MID-NEBRASKA**

AFFIRMATIVE ACTION PLAN

2016

A handwritten signature in black ink, appearing to read "John P. Smith", written over a horizontal line.

Board President

A handwritten signature in black ink, reading "Meredith Collins", written over a horizontal line.

Executive Director

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EEO/AA STATEMENT

Community Action Partnership of Mid-Nebraska is a non-profit Nebraska corporation, organized in compliance with conditions established in the Economic Opportunity Act of 1964, as amended. Community Action Partnership of Mid-Nebraska is committed to the policy of equal employment opportunity and to a plan of affirmative action in order to fulfill that policy. Community Action Partnership of Mid-Nebraska's objective has been based in the past, and continues to be based, upon the desire to attain a work force which mirrors the composition of the available work force in its service area.

In this Affirmative Action Plan, Community Action Partnership of Mid-Nebraska affirms its commitment and pledges its full support to equal employment opportunity for all persons regardless of race, color, ancestry, religion, sex, national origin, marital status, sexual preference, disability, age, or political affiliation.

Community Action Partnership of Mid-Nebraska recognizes that equal opportunity can only be achieved by demonstrated leadership and the implementation of a viable Affirmative Action Plan. To implement these policies, good faith efforts will be directed to:

Determine the extent to which members of all protected groups (racial minorities, women, persons age 40 and over, and persons with disabilities) are under-utilized in office/managerial, professional, technical, admin. support, service workers, operatives, and laborer classifications.

Develop goals and timetables directed towards reversing situations where under-utilization of protected class individuals exists.

Develop a balanced representation of protected groups through recruitment and other measures.

Measure the accomplishment of the Affirmative Action Plan and modify the plan as necessary.

Create a work place environment free of work place harassment based in whole or in part on race, color, ancestry, religion, sex, national origin, marital status, sexual preference, disability, age, or political affiliation which manifests itself in the form of inflammatory comments, jokes, printed material, innuendo, unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.

DESIGNATION OF RESPONSIBILITY

All Employees

All Community Action Partnership of Mid-Nebraska employees are expected to make every reasonable effort to carry out the agency's Equal Employment Opportunity/Affirmative Action Plan responsibilities in spirit. It is expected all employees demonstrate sensitivity to, and respect for, all other employees.

Any employee who causes the agency to be in noncompliance with this policy is responsible for his/her actions. The agency will investigate all EEO/AA complaints. Information received from any and all parties will be confidential during the investigation process. Appropriate disciplinary action will be taken, if warranted, based on the results of the investigation.

Managers/Directors and Supervisors

Each Community Action Partnership of Mid-Nebraska manager/director or supervisor is expected to carry out the agency's EEO/AA policy within his/her designated area of responsibility.

This includes the following:

Periodic review of position descriptions to ensure they accurately reflect the job being performed.

Periodic review of the qualifications of each employee under his/her supervision to insure that opportunity for transfer, training, and promotion is provided as opportunities arise within the agency.

Report all complaints of alleged work place harassment, or any unreported inappropriate behavior observed, within three working days.

Community Action Partnership of Mid-Nebraska managers/directors and supervisors will assist the EEO/AA Officer, as needed, in the identification of problem areas, in the formulation of solutions, and in the establishment of plan goals.

Human Resources Director

Ensure that an Affirmative Action Survey is given to individuals completing a Community Action Partnership of Mid-Nebraska employment application.

Route all completed Affirmative Action Survey forms to the agency's EEO/AA Officer.

Issue internal vacancy memorandums to each agency site.

EEO/AA Officer

The Planning Director will serve as the EEO/AA Officer. The EEO/AA Officer will maintain appropriate files and prepare annual report to be presented to the Community Action Partnership of Mid-Nebraska Board of Directors.

Prepare and submit reports as required by state and federal funding sources.

Receive and process internal complaints of discrimination filed by employees, clients/customers, or agencies which are recipients of grants, contracts, or special projects sponsored by Community Action Partnership of Mid-Nebraska.

Act as liaison between the agency and various regulatory bodies, organizations which provide assistance and services to persons with disabilities, and other appropriate groups.

Develop and interpret policy on affirmative action, equal employment opportunity, and reasonable accommodation, and other related issues.

Help ensure compliance with EEO/AA requirements in personnel policy and procedure.

Disseminate information on current EEO/AA issues and policy changes.

Executive Director

Determine course of action when complaints are received after reviewing the EEO/AA Officer's preliminary investigation report and recommendations.

Conduct interview with complainant.

Carry out/implement disciplinary or corrective action.

(In the extended absence of the Executive Director the Human Resources Director will assume these responsibilities.)

EEO/AA PLAN DISSEMINATION

Each manager/director and supervisor will receive a copy of the plan as it is revised annually. managers/directors will be encouraged to discuss the plan with their employees and will make a copy of the plan readily available to employees, clients/customers, and other interested parties.

A copy of the plan will be available for review at each agency site.

COMPLAINT PROCEDURE

It is the policy of Community Action Partnership of Mid-Nebraska that all women and men are to be treated fairly and equally, and with dignity and respect. Any form of work place harassment or discrimination based on race, color, ancestry, religion, sex, national origin, marital status, sexual preference, disability, age, or political affiliation will not be tolerated.

All employees shall report, in writing on the Agency's Employee Issue or Concern Form, alleged work place harassment or discrimination to the agency's EEO/AA Officer or Human Resources Director as soon as possible after the alleged incident(s).

Any manager/director or supervisor receiving an alleged complaint is obligated to report the complaint, in writing within three working days, to the agency's EEO/AA Officer or Human Resources Director. Failure to do so will be considered a violation of this policy and will be just cause for disciplinary action.

The EEO/AA Officer or Human Resources Director will notify the complainant of his/her rights concerning the pursuit of the allegations by giving the complainant a copy of the policy and conduct a preliminary investigation of the allegations. The preliminary investigation includes a review of the alleged victim's complaints and any corroborated information that may be obtained, excluding information from the alleged perpetrator. The alleged perpetrator is not interviewed by the investigator during the preliminary investigation to ensure the alleged perpetrator does not make any incrimination statements without proper notice. Since the discipline process is designed to protect the alleged perpetrator's due process rights, this process is used when it is necessary to have a formal record of the alleged perpetrator's response to the allegations.

On completion of the preliminary investigation of allegations, the EEO/AA Officer or Human Resources Director will submit a report to the Executive Director of the findings of the investigation and a recommendation as to whether it is believed that reasonable cause exists that work place harassment or discrimination may have occurred.

Complainants and other person(s) involved in the investigation will not be subjected to retaliation, coercion, intimidation, or fear of reprisal. As investigations of alleged work place harassment and discrimination are personnel matters, persons involved shall maintain appropriate confidentiality. Information concerning a complaint shall not be released to anyone who is not a party to or involved in the investigation.

The Executive Director will determine whether to proceed with disciplinary action, impose corrective action, or take no further action. The Executive Director will conduct an interview with the complainant informing them of the determination made.

No more than 15 working days shall elapse from the time the EEO/AA Officer or Human Resources Director receives a written complaint until the Executive Director's interview with the complainant.

Any disciplinary or corrective action will be taken immediately by the Executive Director. Upon completion of such action, the EEO/AA Officer or Human Resources Director will provide a written report of the action taken to the complainant.

In the event the allegation is against the Executive Director, the President of the Board of Directors

will assume the responsibilities as outlined in this procedure.

In the event of an absence of the Executive Director for an extended period of time, the Human Resources Director will assume the responsibilities.

RIGHTS OF COMPLAINANTS

Any employee who believes that he/she is being subjected to harassment or discrimination is encouraged to directly inform the alleged perpetrator(s) that such conduct is offensive and must stop.

If the aggrieved person does not wish to communicate directly with the offending person or persons, or if the direct communication is not effective, the aggrieved person is encouraged to report the incident on the Agency's Employee Issue or Concern form to the agency's EEO/AA Officer or Human Resources Director.

In reporting allegations, complainants should take care to state specific details (wherever practical) including the identity of the alleged perpetrator(s), the date, time and place of the alleged harassment, what was done or said, and the identity of any witnesses who were present.

If the complainant is dissatisfied with the agency's response to the complaint, he/she may contact the State Affirmative Action Office for the purpose of asking that office to conduct an independent investigation. Written correspondence should be directed to the Administrator for Affirmative Action, Affirmative Action Office, P.O. Box 94905, Lincoln, NE 68509-4905.

A report of allegations of work place harassment or discrimination may, at any time, be filed with the Nebraska Equal Opportunity Commission (NEOC) and/or the Federal Equal Employment Opportunity Commission (EEOC). An employee is not required to file allegations with the agency before filing a complaint with an external source.

OCCUPATIONAL CATEGORY DEFINITIONS

(as listed in EEO Rules and Regulations)

Executive/Senior Level Officials and Managers:

Individuals who plan, direct and formulate policies, set strategy and provide the overall direction of enterprises/organizations for the development and delivery of products or services, within the parameters approved by boards of directors or other governing bodies. Residing in the highest levels of organizations, these executives plan, direct or coordinate activities with the support of subordinate executives and staff managers. They include, in larger organizations, those individuals within two reporting levels of the Executive Director. Examples of these kinds of managers are: chief executive officers, chief operating officers, chief financial officers, line of functional areas or operating groups, chief information officers, chief human resources officers, chief marketing officers, chief legal officers, management directors and managing partners. Examples of Mid staff positions include: Executive Director, Chief Financial Officer, Business Manager.

First/Mid Level Officials and Administrators:

Individuals who serve as managers, other than those who serve as Executive/Senior Level Officials and Managers, including those who oversee and direct the delivery of products, services or functions at group, regional or divisional levels of organizations. These managers receive directions from the Executive/Senior Level management and typically lead major business units. They implement policies, programs and directives of executive/senior management through subordinate managers and within the parameters set by Executive/Senior Level management. Examples of these kinds of managers are: vice presidents and directors, Group, regional or divisional controllers; treasurers; human resources, information systems, marketing, and operations managers. The First/Mid Level Officials and Managers Sub – Category also includes those who report directly to middle managers. These individuals serve at functional, line of business segment or branch levels and are responsible for directing and executing the day-to-day operational objectives of officials and managers to subordinate personnel and, in some instances, directly supervising the activities of exempt and non-exempt personnel. Examples of these kinds of managers are: first-line managers; team managers; unit managers; operations and production managers; branch managers; administrative services managers; purchasing and transportations managers; storage and distribution managers; call center or customer service managers; technical support managers; and brand or product managers. Examples of Mid staff positions include: Program Directors, Assistant Fiscal Director, Planning Director.

Professionals:

Positions in this category generally include jobs that require a bachelor's degree, a master's degree or some type of professional certification such as lawyers, physicians, engineers, computer programmers, accountants, financial analysts, social workers, technical writers, veterinarians and airplane pilots. Mid staff examples would include: IT Manager, Family Educator, Family Services Assistant, Teacher, Community Services Coordinator, RN, Community Health Worker, Nutritionist.

Technicians:

Technicians include positions that require scientific skills and knowledge, which are usually acquired from some additional education and in some instances, certification or additional training. This category includes jobs such as emergency medical technicians, dental hygienists, food science technicians, clinical laboratory technologists and drafters. Mid staff examples would include: LPN.

Sales Workers:

Jobs that involve direct sales responsibilities fall under the category of a sales worker. Examples of positions in this classification include real estate sales agents and brokers, financial services, sales agents, travel agents, telemarketers, sales representatives, insurance sales agents, retail salespersons and cashiers.

Administrative Support Workers:

Administrative support workers include jobs involving non-managerial activities such as general office clerks, couriers, paralegals, customer service representatives, shipping and receiving clerks,

secretaries, desktop publishers, administrative assistants, dispatchers, freight agents and postal service mail carriers. Mid staff examples would include: Program Assistant, Dispatcher/Scheduler, Early Head Start Assistant, Head Start Assistant, Teacher's Assistant, Interpreter, Breastfeeding Counselor, Wellness Coordinator.

Craft Workers:

Most positions in this category involve skilled and production occupations or jobs that require a high level of precision and dexterity such as carpenters, electricians, roofers, automotive mechanics, tool and die makers, engravers, sheet metal workers, cabinetmakers, tailors, machinists and avionics technicians.

Operatives:

Operatives include occupations requiring an intermediate skill level that typically necessitate less than a year of training to perform. Jobs in this category include bakers, computer operators, bus drivers, railroad conductors, parking lot attendants, dry cleaning workers, butchers and painting workers. Mid staff examples would include: RYDE Driver.

Laborers and Helpers:

Jobs requiring limited skills or very short-term training fall under this category. Examples of laborers and helpers include service station attendants, sewer pipe cleaners, ground maintenance workers, construction laborers, machine feeders, equipment cleaners, material movers and animal breeders. Mid staff examples would include: Weatherization crew.

Service/Maintenance Workers:

Service maintenance workers include occupations in the personal service, food service, cleaning service and protective service industries such as hairdressers, janitors, security guards, bartenders, food service workers, dental assistants, police officers, crossing guards, tour guides, housekeepers, and animal control workers. Mid staff examples would include: Kitchen help, Assistant cook, Commodities worker.

The following information represents Data collected from the U.S. Census Bureau Equal Employment Opportunity data and from Community Action Partnership of Mid-Nebraska.

27 County area Nebraska
Employment work force
compared to Mid

	Male	Female	N-MGM	African American	Hispanic	Other	Total	40+	Percent 40+
Mgrs/senior executives	11030	4460	15070	43	147	230	15490		
(27 county)	71.2%	28.8%	97.3%	0.3%	.9%	1.5%	100%		
(Mid)	19.0%	81.0%	100.0%	0.0%	0.0%	0.0%	100%		
number	4	17	21	0	0	0	21	19	90.5%
Utilization Analysis	26.7%	281.3%	102.8%	0.0%	0.0%	-			
Professional	3112	5868	8658	10	216	96	8980		
(27 county)	34.7%	65.3%	96.4%	0.1%	2.4%	1.1%	100%		
(Mid)	3.8%	96.2%	88.8%	0.0%	11.2%	0.0%	100%		
number	3	77	71	0	9	0	80	40	50.0%
Utilization Analysis	11.0%	147.3%	92.1%	0.0%	466.7%	-			
Technician	839	1892	2576	14	83	58	2731		
(27 county)	30.7%	69.3%	94.3%	0.5%	3.1%	2.1%	100%		
(Mid)	0.0%	100%	100%	0.0%	0.0%	0.0%	100%		
number	0	5	5	0	0	0	5	2	40.0%
Utilization Analysis	0.0%	144.3%	106.0%	0.0%	0.0%	-			
Admin Support Workers	2866	12855	14765	65	729	162	15721		
(27 county)	18.2%	81.8%	94.0%	0.4%	4.6%	1.0%	100%		
(Mid)	5.4%	94.6%	76.8%	1.8%	21.4%	0.0%	100%		
number	3	53	43	1	12	0	56	26	46.4%
Utilization Analysis	29.7%	115.6%	81.7%	450.0%	465.2%	-			
Operatives	6260	1088	6620	110	512	106	7348		
(27 county)	85.2%	14.8%	90.1%	1.5%	7.0%	1.4%	100%		
(Mid)	62.9%	37.1%	97.1%	0.0%	2.9%	0.0%	100%		
number	22	13	34	0	1	0	35	33	94.3%
Utilization Analysis	73.8%	250.7%	107.8%	0.0%	41.4%	-			
Laborers	5540	1162	5575	55	947	125	6702		
(27 county)	82.7%	17.3%	83.2%	0.8%	14.1%	1.9%	100%		
(Mid)	100.0%	0.0%	100%	0.0%	0.0%	0.0%	100%		
number	6	0	6	0	0	0	6	4	66.7%
Utilization Analysis	120.9%	0.0%	120.2%	0.0%	0.0%	-			
Service Workers	4155	11719	13919	134	1352	469	15874		
(27 county)	26.2%	73.8%	87.7%	0.8%	8.5%	3.0%	100%		
(Mid)	20.0%	80.0%	90.0%	0.0%	10.0%	0.0%	100%		
number	4	16	18	0	2	0	20	18	90.0%
Utilization Analysis	76.3%	108.4%	102.6%	0.0%	117.6%	-			

LABOR POOL UTILIZATION DATA BY TOTAL WORKFORCE

Totals	Male	Female	N-MGM	African American	Hispanic	Other	Total		
27 County area	33802	39044	67183	431	3986	1346	72846		
	46.4%	53.6%	92.2%	0.6%	5.5%	1.7%	100%	40+	% 40+
Mid	18.8%	81.2%	88.8%	0.5%	10.8%	0.0%	100%		
number	42	181	198	1	24	0	223	142	63.8%

N-MGM-Non Minority Group Member

* Other includes American Indian or Alaskan Native, Asian, Native Hawaiian or Pacific Islander, & 2 or more races

There are no figures from Labor Pool for 40+ for 27 county labor pool

*Labor Pool data obtained from the Nebraska Department of Labor using the U.S. Census Bureau Equal Employment Opportunity data website of the most recently published data available.

A note on Utilization Analysis: Under-utilization is defined as "having fewer minorities or women in a particular job group than what would be reasonably expected by their availability in the relevant job market." In using the Eighty Percent (80%) Rule, underutilization exists if the percentage of females and/or minorities in a particular job category (Mid) is less than 80% of the availability percentage (the 27 county workforce).

When employment is less than 80% of availability, practical and reasonable goals can be set to help the agency achieve a more diverse workplace.

Community Action Partnership of Mid-Nebraska
(n = 227 total applicants self-reporting and 49 hires)

Applicant Flow and Hire Analysis Report January – December 2015

Occupational Category	Total		Male		Female		40+		Veteran	
	Apps	Hired	Apps	Hired	Apps	Hired	Apps	Hired	Apps	Hired
Senior / Executive	0	1	0	1	0	0	0	0	0	0
Professionals	51	22	5	1	46	21	21	8	1	0
Admin Support	99	12	2	0	97	12	34	2	3	1
Operatives	41	7	27	3	14	4	34	5	9	2
Laborers	6	0	3	--	3	--	5	--	0	--
Service Workers	12	7	0	0	12	7	7	6	0	0
Any open job category	17	--	3	--	14	--	11	--	1	--
TOTAL	227	49	40	5	187	44	112	21	14	3
Percentage		22%			13%		24%		19%	
										24%

Occupational Category	White		Hispanic Latino		African American	
	Apps	Hired	Apps	Hired	Apps	Hired
Senior / Executive	0	1	0	0	0	0
Professionals	43	19	5	2	1	1
Admin Support	70	5	23	6	3	1
Operatives	38	7	2	0	1	0
Laborers	4	--	2	--	0	--
Service Workers	12	6	0	1	0	0
Any open job category	12	--	5	--	0	--
TOTAL	180	38	37	9	5	2
Percentage		21%		24%		40%

* 8 applicants did not identify their age; 5 applicants and 5 hires did not indicate their veteran status

ANALYSIS OF 2015 PLAN

Selection

Objective: To hire or promote in an equitable manner, considering each applicant's qualifications, the objective and measurable selection criteria specific for each position, and the desire to have a work force which is representative of the composition of the agency's labor pool.

Trends from 2014 to 2015:

- Overall, Mid employed fewer more men in 2015, 42 compared to 49 in 2014, a 2.9% decrease.
- The number of African American employees decreased from 2 to 1.
- The number of Hispanic employees increased from 23 to 24.
- The number of persons employed over 40 remained at 142, but the proportion of Mid staff that was 40 or older increased by 1%.

Accomplishments: In the occupational categories, Mid has three out of the seven categories tracked where the percent of the Hispanic workforce (which represents our largest minority) exceeds the State average for our 27 county area. These categories are Professional, Admin Support, and Service Workers. Overall our percent of Hispanic staff represent 10.8% of Mid staff in comparison to the State workforce percent of 5.5%. Although the Nebraska Department of Labor is not currently tracking those workers in the 40+ age group, Mid has a workforce that consists of 63.8% of staff aged 40 or over.

Areas for improvement: The agency's staff is comprised of 18.8% males and 81.2% females, in comparison to the 27 county area workforce figures of 46% male and 54% female (it is typical of most Community Action Agencies to have predominately female staff). Recruitment of more males for the larger programs such as Head Start and WIC would help to adjust this imbalance.

Minorities should be recruited, when openings occur, in the following categories where there are currently one or fewer: Managers/Senior Executive, Technicians, and Operatives as positions become available.

Recruitment

Objective: To actively seek qualified applicants from all protected groups to reflect changing population demographics, prevent discrimination and to include members of these groups at all levels of our agency work force.

Accomplishments

The agency's Human Resources Director was utilized to help screen applicants on a consistent basis and the agency's applicant bank accessed as appropriate.

Recruitment contacts were made with Nebraska Workforce Development, UNK, and Vocational Rehabilitation.

Communication

Objective: To increase staff awareness of and commitment to equal employment opportunity and affirmative action.

Accomplishments

Affirmative Action Labor Laws are posted in all Community Action Partnership of Mid Nebraska locations that inform clients of rights to programs/services and the contact for complaints.

A copy of the Affirmative Action report is emailed to all sites and is accessible on the agency's website, www.communityactionmidne.com.

Upward Mobility

Objective: To demonstrate support for upward mobility through enhancement of job performance and staff development.

Accomplishments

Staff throughout the agency attended workshops, conferences, etc. held outside the agency.

Internal staff development training sessions were held during program-specific staff meetings.

Cross-training took place in several programs.

Staff training hours are tracked by programs.

GOALS & TIMETABLES FOR 2016 PLAN

Selection

Objective: Select or promote in an equitable manner, considering each applicant's qualifications, the objectives and measurable selection criteria specific for each position, and the desire to have a work force which is representative of the composition of the agency's labor pool.

ACTION ITEM	RESPONSIBILITY	TARGET DATE
Each manager/director and supervisor will receive a copy of the AA Plan update.	EEO/AA Officer	Ongoing

Community Action Partnership of Mid-Nebraska will emphasize equal employment opportunity in all areas of the agency.

Executive Director
Managers/Directors and Supervisors
EEO/AA Officer
Interview/Selection Team

Ongoing

Recruitment

Objective: To actively seek qualified applicants from all protected groups to reflect changing demographics, prevent discrimination and to include members of these groups at all levels of the agency's work force.

ACTION ITEM	RESPONSIBILITY	TARGET DATE
Advertise in additional newspaper markets to increase the diversity of the applicant pool.	Human Resources Director	Ongoing
Remind Managers/Directors and Supervisors of opportunity to recruit through contacts with local groups from various cultural communities.	Human Resources Director EEO/AA Officer	Ongoing
Access the agency's applicant bank.	Managers/Directors and Supervisors	Ongoing

Communication

Objective: To increase staff awareness of and commitment to equal opportunity and affirmative action.

ACTION ITEM	RESPONSIBILITY	TARGET DATE
All employees will have a copy of the EEO/AA Plan available at their assigned office site or the Website	EEO/AA Officer	Ongoing
Training on sensitivity to multi-cultural and/or gender issues will be offered, as resources and funding allows, at all-staff meetings.	Executive Director EEO/AA Officer	Ongoing
Brochures will be updated at reprinting to inform clients of their right to programs/	Managers/Directors and Supervisors	Ongoing

services free of discrimination.

Upward Mobility

Objective: To demonstrate support for upward mobility through enhancement of job performance and staff development.

ACTION ITEM	RESPONSIBILITY	TARGET DATE
Vacant positions will be forwarded to all agency email addresses and posted at each agency site, if feasible. Information will include the job title, essential functions, qualifications for the positions, office site, work hours, and closing date for applications. (External recruitment will be initiated simultaneously.)	Human Resources Director	Ongoing
Regular employees will attend training work shops, conferences, etc. as individual program budgets allow.	Managers/Directors and Supervisors	Ongoing
Staff Development training notifications and/or pamphlets, etc. will be shared.	Executive Director Managers/Directors and Supervisors EEO/AA Officer	Ongoing
Managers/Directors and Supervisors are required to provide performance feed back timely, to ensure each employee an opportunity to review and enhance job performance.	Executive Director Managers/Directors and Supervisors	Ongoing