

EXECUTIVE ORDER 11246 SECTION 503 & VEVRAA AFFIRMATIVE ACTION PLAN

Agency on Aging of Pasco-Pinellas, Inc.

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TABLE OF CONTENTS

ORGANIZATIONAL PROFILE.....	3
ORGANIZATIONAL DISPLAY.....	6
JOB CATEGORY ANALYSIS.....	7
LISTING OF JOB TITLES.....	7
UTILIZATION ANALYSIS.....	8
PLACEMENT OF INCUMBENTS IN JOB GROUPS.....	8
DETERMINING AVAILABILITY.....	9
COMPARING INCUMBENCY TO AVAILABILITY & ESTABLISHING PLACEMENT GOALS.....	11
EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT.....	12
DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION.....	14
IDENTIFICATION OF PROBLEM AREAS.....	16
ACTION-ORIENTED PROGRAMS.....	19
INTERNAL AUDIT AND REPORTING SYSTEM.....	20
POLICY STATEMENT - EQUAL EMPLOYMENT OPPORTUNITY FOR INDIVIDUALS WITH DISABILITIES AND PROTECTED VETERANS.....	22
REVIEW OF PERSONNEL PROCESSES.....	24
REVIEW OF PHYSICAL AND MENTAL JOB QUALIFICATIONS.....	25
REASONABLE ACCOMMODATION.....	26
HARASSMENT PREVENTION & PROHIBITION AGAINST RETALIATION.....	27
EXTERNAL DISSEMINATION OF POLICY, OUTREACH & POSITIVE RECRUITMENT.....	28
INTERNAL DISSEMINATION OF EEO POLICY.....	30
AUDIT AND REPORTING SYSTEM.....	32
ESTABLISHMENT OF RESPONSIBILITY FOR AAP IMPLEMENTATION.....	34
TRAINING TO ENSURE AAP IMPLEMENTATION.....	36
INVITATION TO SELF-IDENTIFY FOR PROTECTED VETERANS.....	37
INVITATION TO SELF-IDENTIFY FOR INDIVIDUALS WITH DISABILITIES.....	39

ORGANIZATIONAL PROFILE

The Area Agency on Aging of Pasco-Pinellas, Inc. (AAAPP), is a private, non-profit organization designated under the Older Americans Act by the State of Florida Department of Elder Affairs (DOEA) to plan, coordinate, and advocate on behalf of older persons in planning and service area five (PSA 5). In addition to one of its primary roles as administrator of state and federal grants for seniors, the agency serves as an advocate and visible focal point to foster the development of a more comprehensive and coordinated senior service system within the PSA.

The diverse matrix of organizations that plan and provide services to older persons is known as "the aging network." The administrative hierarchy of this network includes the U.S. Health and Human Services' (HHS) division of Administration for Community Living (ACL) at the federal level, the Florida Department of Elder Affairs (DOEA) at the state level, and eleven area agencies on aging (AAA) at the sub-state level. The aging network also extends to public and private local service providers such as councils on aging, social service departments of local governments and non-profit organizations, for-profit organizations, multipurpose senior centers, and advocacy groups. These local service providers have a unique understanding of the service delivery system in their communities and have extensive experience in providing home and community-based services.

This core structure of the aging network is the foundation for the development of a more comprehensive network that encompasses older persons, consumers of services, national organizations, other federal and state agencies, private industry, and the general public. Each part of the aging network operates from a unique perspective with different expectations that directly or indirectly impact on the lives of older persons, but all work together with the common interest of improving the quality of life for older people.

Mission

AAAPP is a non-profit organization that has been serving seniors and individuals with disabilities in Pinellas and Pasco counties since 1974. We serve as the Aging and Disability Resource Center for the entire two-county area, providing an initial entry point for all aging and disability social services and coordinating a network of partners and providers to better meet the needs of our aging population.

AAAP is a trusted resource to advocate, educate and empower seniors, adults with disabilities and caregivers which promotes independence, in partnership with the community.

Vision

Our Vision is our community will provide seniors, adults with disabilities and caregivers with the resources and services needed to maintain independence, promote healthy aging and live an optimal quality of life.

Core Values

AAAPP regards all seniors and adults with disabilities as valued members of our community who merit dignity, respect and the resources needed for an optimal quality of life.

Our Diversity, Equity & Inclusion (DEI) Statement

AAAPP's services are available to all eligible individuals in Pasco and Pinellas counties and AAAPP complies with all legally mandated non-discrimination policies. AAAPP strives to provide services through a lens of inclusivity by making sure underserved communities are aware of the services available and providing the requisite assistance in linking eligible individuals to available services. The Board of Directors, Advisory Council and staff will be representative of the seniors, adults with disabilities and caregivers we serve. We welcome the unique perspectives of all persons in our quest to fulfill our mission.

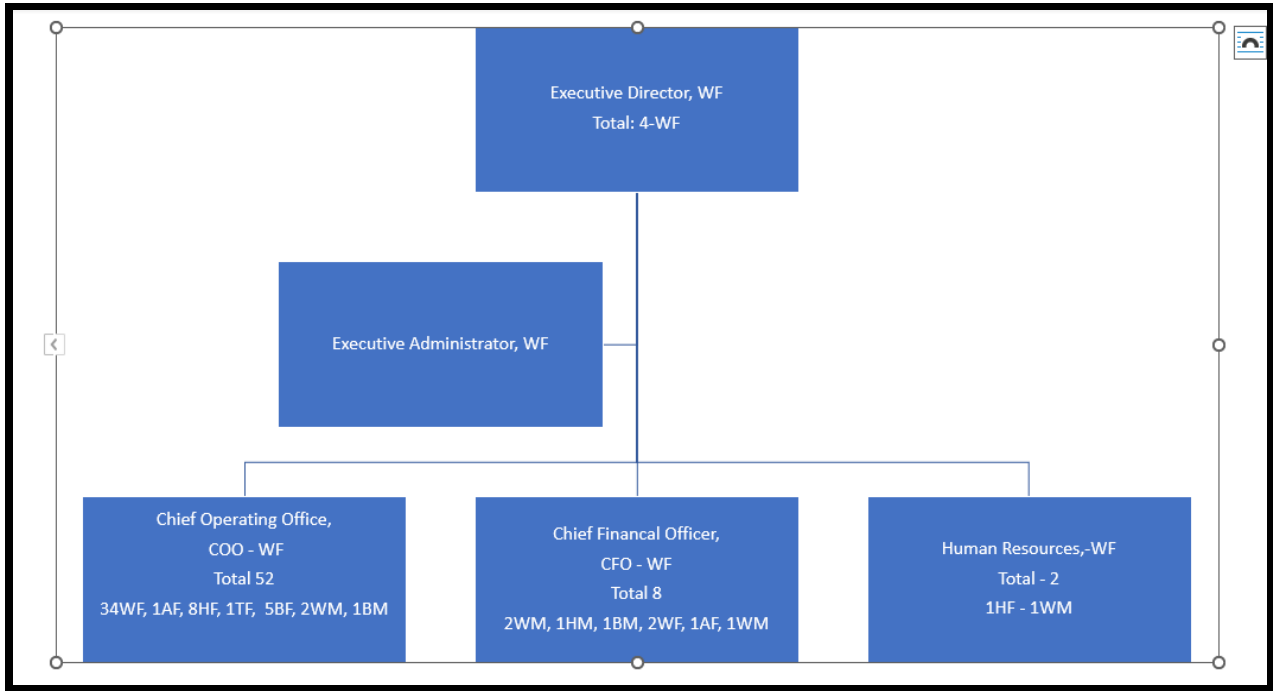
One of the main challenges faced by this strong and vibrant network is how to meet the needs of a growing client base with static or decreased funding in an economic climate where, currently, costs for goods and services are increasing and income/revenue is decreasing. Along with this monumental challenge, however, comes new opportunities to create new alliances, improve and modernize the system itself and to further harness the incredible service potential of volunteer groups and individuals, senior and otherwise.

In addition to providing detailed information on the needs of seniors, the broader aging network, and AAAPP's programs and partners, The Area Agency on Aging of Pasco-Pinellas prides itself on its commitment to transparency. AAAPP is governed by Florida Sunshine Law and Public Records Law, ensuring transparency and fiduciary responsibility of the organization. The Executive Director and Program Directors have and will continue to evaluate, improve, and streamline its administrative, contractor and outreach processes to maximize program efficiency and effectiveness. These activities are conducted with the primary goal in mind to increase and improve direct services and support for seniors. To this end, efforts to enhance and expand collaborative efforts with health care providers, traditional partners, local governments and volunteer programs, advocacy, and fund raising will continue to be a priority for AAAPP and the entire PSA.

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ORGANIZATIONAL DISPLAY

Area Agency on Aging Pinellas-Pasco Inc.



JOB CATEGORY ANALYSIS

LISTING OF JOB TITLES

Job Title	Category
Executive Director	Exec/Sr. Official & Mgr
Chief Financial Officer	Exec/Sr. Official & Mgr
Chief Operating Officer	Exec/Sr. Official & Mgr
ADRC Director	Exec/Sr. Official & Mgr
Director of Program's	Exec/Sr. Official & Mgr
Finance Manager	First Mid Official & Mgr
Controller	First Mid Official & Mgr
HR Manager	First Mid Official & Mgr
ADI Program Manager	First Mid Official & Mgr
IT Manager	First Mid Official & Mgr
Medicaid Benefits Counselor Coordinator	First Mid Official & Mgr
GR Program Manager	First Mid Official & Mgr
OAA Program Manager	First Mid Official & Mgr
Program Supervisor	First Mid Official & Mgr
VA Program Manager	First Mid Official & Mgr
Senior Community Health Coordinator	First Mid Official & Mgr
Intake Specialist Coordinator	First Mid Official & Mgr
Shine Program Manager	First Mid Official & Mgr
Health and Wellness Coordinator	First Mid Official & Mgr
ADRC Helpline Manager	First Mid Official & Mgr
Data IT Support Specialist	Professionals
Grant Accountant	Professionals
Health & Wellness Specialist	Professionals
Information & Assistance Specialist	Professionals
Chores Services Coordinator	Professionals
Intake Specialist	Professionals
Medicaid Benefits Counselor	Professionals
Medicaid Waiver / QA Specialist	Professionals
Mental Health Counselor	Professionals
Senior Accountant	Professionals
Senior Community Health Specialist	Professionals
Vaccine Coordinator	Professionals
Service Analyst	Professionals
Lead Service Analyst	Professionals
Administrative Assistant/Receptionist	Administration
ARDC Program Assistant	Administration
Executive Assistant	Administration
HR Generalist	Administration
SMP Program Assistant	Administration
Shine Program Assistant	Administration

UTILIZATION ANALYSIS

PLACEMENT OF INCUMBENTS IN JOB GROUPS

Job Category		Total Number of Incumbents	Number of Females	Female Incumbency Percentage	Number of Minorities	Minority Incumbency Percentage
1.1	Executive/Sr. Level Officials & Managers	5	5	100%	0	0%
1.2	First/Mid-Level Officials & Managers	15	12	80%	5	33%
2	Professionals	42	38	90%	13	31%
3	Technicians	n/a	n/a	n/a	n/a	n/a
4	Sales Workers	n/a	n/a	n/a	n/a	n/a
5	Administrative Support Workers	5	4	80%	3	60%
6	Craft Workers	n/a	n/a	n/a	n/a	n/a
7	Operatives	n/a	n/a	n/a	n/a	n/a
8	Laborers & Helpers	n/a	n/a	n/a	n/a	n/a
9	Service Workers	n/a	n/a	n/a	n/a	n/a
Total		67	59	88%	21	31%

DETERMINING AVAILABILITY

Job Category: (1.1) Executive/Sr. Level Officials & Managers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	11.0%	28.6%	20%	2.7%	9.9%	2014-2018 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Pinellas County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	80%	0.0%	0.0%	Organizational Data
Totals			100%	2.7%	9.9%	

Job Category: (1.2) First/Mid-Level Officials & Managers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	18.8%	45.2%	25%	4.7%	11.3%	2014-2018 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Pinellas County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	75%	0.0%	0.0%	Organizational Data
Totals			100%	4.7%	11.3%	

Job Category: (2.0) Professionals	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	24.9%	60.3%	30%	7.4%	18.1%	2014-2018 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Pinellas County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	70%	0.0%	0.0%	Organizational Data
Totals			100%	7.4%	18.1%	

Job Category: (5.0) Administrative Support Workers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	26.2%	74.6%	90%	23.5%	67.1%	2014-2018 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Pinellas County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	10%	0.0%	0.0%	Organizational Data
Totals			100%	23.5%	67.1%	

COMPARING INCUMBENCY TO AVAILABILITY & ESTABLISHING PLACEMENT GOALS

Job Category		Female Incumbency	Female Availability	Establish Goal? Yes/No	If Yes, Goal for Females	Minority Incumbency	Minority Availability	Establish Goal? Yes/No	If Yes, Goal for Minorities
1	Executive/Sr. Level Officials & Managers	100%	9.9%	No		0%	2.7%	Yes	2.7%
1.1	First/Mid-Level Officials & Managers	80%	11.3%	No		33%	4.7%	No	
2	Professionals	90%	18.1%	No		31%	7.4%	No	
3	Technicians	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	Sales Workers	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	Administrative Support Workers	80%	67.1%	No		60%	23.5%	No	
6	Craft Workers	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
7	Operatives	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	Laborers & Helpers	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
9	Service Workers	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

Note: The 80% rule was followed in declaring underutilization and establishing goals when the actual employment of minorities or females is less than 80% of their availability.

EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT

This statement is to reaffirm AAAPP's policy on providing Equal Employment Opportunity to all employees and applicants for employment in accordance with all applicable Equal Employment Opportunity/Affirmative Action Laws, directives and regulations of Federal, State and Local governing bodies or agencies thereof.

AAAPP will not discriminate against any employee or applicant for employment because of race, color, national origin, sex, sexual orientation, gender identification, transgender, age, disability, military/veteran status, marital status, pregnancy, genetic information, religion or any other protected category.

AAAPP will take Affirmative Action to ensure that all employment practices are free of such discrimination. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selective layoff, disciplinary action, separation, rates of pay or other forms of compensation, and selection for training, including apprenticeship.

AAAPP prohibits harassment of any employee or job applicant on the basis of their protected class status.

AAAPP will commit the necessary time and resources, both financial and human, to achieve the goals of Equal Employment Opportunity and Affirmative Action.

AAAPP will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these Equal Employment Opportunities and Affirmative Action objectives as well as other established criteria.

Any employee of AAAPP or subcontractors to AAAPP who do not comply with

the Equal Employment Opportunity Policies and Procedures set forth in this Statement and plan will be subject to disciplinary action. Any subcontractor not complying with all applicable Equal Employment Opportunity/Affirmative Action laws, directives and regulations of the Federal, State and local-governing bodies or agencies thereof will be subject to appropriate legal sanctions.

AAAPP appointed the Human Resources Manager as EEO Coordinator to manage AAAPP's Equal Employment Opportunity Program. The responsibilities will include monitoring all Equal Employment Opportunity activities and reporting the effectiveness of this Affirmative Action Program, as required by Federal, State and Local agencies. If any employee or applicant for employment believes he/she has been discriminated against, please contact the EEO Coordinator.

Signature: _____ Date _____
Executive Director

DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION

Responsibilities of the Equal Employment Opportunity Coordinator.

The Human Resources Manager has been designated the Equal Employment Opportunity Coordinator and has the responsibility for designing and ensuring the effective implementation of AAAPP's Affirmative Action Program (AAP). These responsibilities shall include, but are not limited to the following:

- Developing Equal Employment Opportunity (EEO) policy statements, affirmative action programs and internal and external communication procedures;
- Assisting in the identification of AAP/EEO program areas;
- Assisting management in arriving at effective solutions to AAP/EEO problems;
 - Measures the effectiveness of the program;
 - Determines the degree to which AAP goals and objectives are met; and
 - Identifies the need for remedial action;
- Keeping AAAPP's Executive Director informed of equal opportunity progress and reporting potential problem areas within the organization through regular reports;
- Reviewing the organization's AAP for qualified minorities and women with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
- Auditing the contents of the company's bulletin board to ensure compliance information is posted and up-to-date; and
- Serving as liaison between AAAPP and enforcement agencies.

Responsibilities of Managers and Supervisors

It is the responsibility of all managerial and supervisory staff to follow AAAPP's Affirmative Action Plan. These responsibilities include, but are not limited to:

- Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary;
- Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and separation actions occur; and
- Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

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IDENTIFICATION OF PROBLEM AREAS

We completed an analysis of our organization using the areas described below.

The results of the review; the corrective action taken, if necessary; and our goals are detailed for each area. The reporting period used for the information is January 1, 2023 – December 31, 2023.

1. **Workforce Composition:** The utilization of minorities and females in the organization was reviewed. The results revealed that we have no underutilization of minorities in the job categories other than executive. We will set a goal to improve the executive area that is underutilized and continue to have no underutilization in all job categories.
2. **Recruitment:** We use commercial employment advertising venues to encourage employment applications from women and minorities. When we use internal or commercial employment advertising venues, we will include the “EOE/AA” designation on all print and electronic advertisements for employment. Samples of our advertisements are available for review.
3. **Applicant Flow Composition:** There were 36 positions filled during this reporting period. The fill rate was 78% female and 67% minority. There were 1,135 applicants for the open positions. Of those applicants, 759 were asked to participate in our voluntary self-identifying demographic survey. From the voluntary survey, 76% reported as female, and 55% reported as minority. Going forward all applicants are given the opportunity to complete the voluntary survey.
4. **Total Selection Process:** The advertisements, application forms, interview procedures, job descriptions, and the qualifications necessary to perform each job were reviewed for deficiencies that would unnecessarily exclude minorities and females. None were found. The selection rates for minorities and women relative to non-minorities and males were reviewed and evaluated against the weighted factor for the area workforce.

Job Category	Number of Hires	Number Females Selected	% Females Selected	Number Minorities Selected	% Minorities Selected
Executive/Sr. Level Officials & Managers	2	2	100%	0	0%
First/Mid-Level Officials & Managers	5	3	60%	1	20%
Professionals	22	18	82%	10	45%
Technicians	0	N/A	N/A	N/A	N/A
Sales Workers	0	N/A	N/A	N/A	N/A
Administrative Support Workers	7	5	71%	2	29%
Craft Workers	0	N/A	N/A	N/A	N/A
Operatives	0	N/A	N/A	N/A	N/A
Service Workers	0	N/A	N/A	N/A	N/A

- There was 1 new hire and 1 promotion in the Executive Sr. Level Officials & Managers job category during this reporting period.
- There were 3 new hires and 2 promoted/transferred in the First/Mid-Level Officials & Managers job category during this reporting period.
- There were 19 new hires and 3 promotions in the Professionals job category during this reporting period.
- There were 7 new hires in the Administrative Support Workers job category during this reporting period.
- The selection rate for both females and minorities was in the range or above the weighted factor for all job categories other than the executive job category. We will continue to monitor the selection rate for new hires.

5. **Transfer and Promotion Practices:** There were 12 favorable transfers or promotions during this reporting period. 92% were female and 17% were minorities. This compares to a workforce that is 88% female and 31% minorities. There is no deficiency in the number of females and minorities that were promoted during this reporting period. We will continue to monitor the transfer and promotion rate for incumbent employees.
6. **Separations:** There was a total of 25 voluntary/involuntary separations during this reporting period. Of those, 52% of the separations were minorities compared to a workforce of 31% minorities.

The separation percentage rate for minorities is higher than the total workforce percentage rate at the end of the reporting period. Of the total separations during this reporting period, 96% were females compared to a workforce of 88% females. The separation percentage rate for females is higher than the total workforce percentage rate at the end of the reporting period.

- 7. **Facilities and Company-sponsored Activities:** The participation of minorities and women in company-sponsored recreation activities, social events, and use of facilities was reviewed. We are not aware of any conditions or practices that would tend to lead to exclusion or low participation of anyone in a protected class.
- 8. **Seniority Practices and Contract Provisions:** The seniority practices and contract provisions, if any, are reviewed for impacts on minorities and women. There were no such practices during this reporting period.
- 9. **Company Training Programs/Educational Assistance:** The company training programs will continue to be reviewed for under-representation or low participation by minorities and women.
- 10. **Regulatory Reporting:** The first EEO-1 was completed and certified for the Year 2022. OFS Company ID NR28034. The 2022 report reflected 92% female and 33% minority.
- 11. **Workforce Attitude:** The attitude of our workforce is monitored and reviewed for misunderstandings and/or lack of support for equal employment and affirmative action objectives and requirements. No corrective action was necessary during this reporting period. We will continue to monitor our workforce attitude and will take action, if needed, with positive training programs.
- 12. **Records, Posters and Subcontractor Notification:** Our Human Resources Department collects and maintains the records necessary to monitor and analyze the progress of our Affirmative Action Plan. Notices of our Equal Employment Opportunity and Affirmative Action Policies are prominently displayed on all of our employee bulletin boards. Subcontractors either have been or will be notified of our Equal Employment Opportunity and Affirmative Action Policies and are required to be in compliance with EEO/AA requirements.

ACTION-ORIENTED PROGRAMS

AAAPP has instituted action programs to eliminate identified problem areas and to help achieve specific affirmative action goals.

The areas that we will scrutinize for problems or deficiencies are:

- Underutilization of protected classes in specific job categories
- Movement of protected classes occurring at lesser rate
- Selection process eliminating protected classes at a higher rate
- Application forms not in compliance with the laws
- Inaccurate position descriptions or qualifications
- Invalid selection procedures
- Higher rejection rate of minority and female applicants.
- Exclusion of minorities and women from employer-sponsored programs/activities
- Seniority provisions contributing to discrimination
- Employees at all levels not supporting affirmative action policies
- Under-representation of minorities and females in training programs
- Lack of formal evaluation of the EEO/AA program's effectiveness
- EEO/AA clause not on purchase orders/contracts
- EEO/AA posters not displayed.

INTERNAL AUDIT AND REPORTING SYSTEM

Records

Records will be maintained by race and gender of all personnel actions, e.g., applicant flow, new hires, promotions, transfers, training, demotions, layoffs, recalls and separations. These records will be kept separate from individual employee personnel files.

Progress Reports

Progress reports will be provided to the Executive Director and the leadership team quarterly. Such reporting may include:

1. Statistical summary by race and sex of personnel actions indicated in the above "Records" section.
2. List of the goals established in the Affirmative Action Plan and a narrative explanation of the progress toward each goal including an explanation of the opportunities that have occurred, additional numerical goals that have been established as a result of the application of the Annual Hiring/Promotion Rate to employment opportunities, and the positive efforts made to attain each goal.
3. Explanations of Affirmative Action accomplishments where no goal was established.
4. Explanation of other Affirmative Action efforts, such as:
 - a. Minority and female referral sources contacted, persons contacted, dates of contact, and results.
 - b. Participation in EEO/AA related community activities.
 - c. Counseling of minorities and females.
 - d. Participation of minorities and females in training.

Meetings

1. Program effectiveness and recommendations for improvement will be discussed at least quarterly during staff meetings with Leadership.

Year-end Report of Affirmative Action Program Results

When required, a written report will be prepared and forwarded to the appropriate Federal, State and local-governing bodies or agencies thereof within 30 days of completion of the first-year certification and 30 days before expiration of the Certificate of Compliance, which summarizes all data previously prepared. This report includes at least the following:

1. Twelve-month statistical data by job category for personnel actions listed.
2. A narrative explanation of goal accomplishment for each goal established.
3. A detailed narrative explanation of good faith efforts for each goal not accomplished.

POLICY STATEMENT - EQUAL EMPLOYMENT OPPORTUNITY FOR INDIVIDUALS WITH DISABILITIES AND PROTECTED VETERANS

It is the policy of AAAPP not to discriminate against any employee or applicant for employment because he or she is an individual with a disability or a protected veteran, (i.e., disabled veteran, Armed Forces service medal veteran, recently separated veteran, or other veterans who served during a war, or in a campaign or expedition for which a campaign badge has been authorized). It is also the policy of AAAPP to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including, but not limited to recruitment, hiring, upgrading, promotion, demotion, transfer, layoff, recall, separation, rates of pay or other forms of compensation, and selection for training, at all levels of employment.

Employees and applicants of AAAPP will not be subject to harassment on the basis of disability or status as a protected veteran. Additionally, retaliation, including intimidation, threats, or coercion, because an employee or applicant has objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State or local EEO law regarding individuals with disabilities or protected veterans is prohibited.

As Executive Director of AAAPP, I am committed to the principles of Affirmative Action and Equal Employment Opportunity. In order to ensure dissemination

and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected the Human Resources Manager, as Equal Employment Opportunity Coordinator for AAAPP. One of the assigned duties will be to establish and maintain an internal audit and reporting system to allow for the effective measurement of AAAPP programs.

In furtherance of AAAPP's policy regarding Affirmative Action and Equal Employment Opportunity, we have developed a written Affirmative Action Program which sets forth the policies, practices and procedures that we are committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request, during normal business hours, in our Human Resources Department. Interested persons should contact the Human Resources Manager for assistance.

Signature: _____
Executive Director

Date _____

REVIEW OF PERSONNEL PROCESSES

AAAPP reviews annually its personnel processes to determine whether its present procedures assure careful, thorough and systematic consideration of the qualifications of known individuals with disabilities and protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, AAAPP limits its consideration of a protected veteran's military record, including discharge papers, to only that portion of the record, which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon AAAPP's review of its personnel processes, it will modify the personnel processes when necessary and will include the development of new procedures in this Affirmative Action Program to ensure equal employment opportunity. To date, no modifications have been necessary.

REVIEW OF PHYSICAL AND MENTAL JOB QUALIFICATIONS

The physical and mental job qualifications of all jobs were reviewed during this reporting period to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified that are likely to have a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

AAAPP will continue to review physical and mental job qualification requirements whenever a job is vacated and AAAPP intends to fill it through either hiring or promotion and will conduct a qualifications review whenever job duties change. No pre-employment physical examinations or questionnaires are used in AAAPP's hiring process.

If, at any time in the future, AAAPP should inquire into an employee's physical or mental condition or should conduct a medical examination, we affirm that such inquiries or exams will be conducted in accordance with the Section 503 regulations and other applicable laws and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations and other applicable law. The results of the examination or inquiry will only be used in accordance with the Section 503 regulations.

REASONABLE ACCOMMODATION

AAAPP commits to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities and qualified disabled veterans unless such accommodation would impose an undue hardship on the conduct of its operations. AAAPP also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation would cause significant difficulty or expense.

AAAPP also makes reasonable accommodations for sincerely held religious beliefs and as required by the Pregnant Worker's Families Act.

HARASSMENT PREVENTION & PROHIBITION AGAINST RETALIATION

Employees and applicants of AAAPP will not be subject to harassment because of disability or their status as a protected veteran or because of race, color, national origin, sex, sexual orientation, gender identity, transgender, age, marital status, pregnancy, parental status, disability, genetic information, religion or any other protected category. If an employee or applicant believes that he/she has been subjected to harassment because of their protected status he/she should promptly contact their manager or the EEO Coordinator for assistance.

Retaliation, including intimidation, threat, or coercion, against an employee or applicant because they have objected to discrimination, engaged or may have engaged in filing a complaint, assisted in a review, investigation, or hearing have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding legally protected status is prohibited. Any employee or applicant who believes that they have been subject to retaliation because of their protected status should contact the EEO Coordinator for assistance.

This policy will be communicated to all employees and supervisors annually.

EXTERNAL DISSEMINATION OF POLICY, OUTREACH & POSITIVE RECRUITMENT

AAAPP has adopted OFCCP's 5.4% (based on Department of Labor's annual benchmark figure 2023) hiring benchmark for protected veterans and 7.0% utilization goal for individuals with disabilities.

All subcontractors, vendors and suppliers are provided notification of AAAPP's Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities and qualified protected veterans. All recruiting sources, including State employment agencies, educational institutions and social service agencies are informed of the company's policy concerning the employment of qualified individuals with disabilities and qualified protected veterans and are advised to actively recruit and refer qualified persons for job opportunities.

AAAPP lists all suitable employment openings with the appropriate employment service delivery system where the openings occur and maintains regular contact with the local veterans' employment representative. A copy of AAAPP's Affirmative Action policy for individuals with disabilities and qualified protected veterans is available to the State Employment Service annually.

Formal briefing sessions will be held with representatives from recruitment sources and placement agencies, which include facility tours, discussion of current and prospective position openings, job descriptions and required qualifications and explanations of AAAPP's selection procedures. Formal arrangements are made to ensure that each recruitment source is provided with timely notice of job opportunities, to ensure that recruitment sources have an opportunity to refer qualified candidates.

Where applicable, AAAPP participates in local job fairs sponsored by support groups for individuals with disabilities and veterans.

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INTERNAL DISSEMINATION OF EEO POLICY

Copies of our affirmative action programs are made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support. Policies are restated to managers and supervisors annually.

AAAPP's Affirmative Action policy and the EEO poster are located on the employee bulletin board.

All applicants are invited to identify themselves as an individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as may be amended from time to time, and/or as a protected veteran under the equal employment opportunity provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, if they wish to benefit under this affirmative action program. Such invitation has been posted on bulletin boards throughout the office. Employees may self-identify at any time.

All employees are advised annually of the company's policy and encouraged to aid in AAAPP's affirmative action efforts to ensure a fair and effective program. The policy is redistributed to employees at this time.

Briefing sessions are conducted annually for managers and supervisors to review the applicable regulations and to discuss such affirmative action measures as training and reasonable accommodation.

When making internal Equal Opportunity audits, the implementation of this affirmative action program will be reviewed.

Articles and pictures regarding the accomplishments of employees who are individuals with disabilities and protected veterans shall be included in company publications.

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AUDIT AND REPORTING SYSTEM

The EEO Coordinator has the responsibility for developing and preparing the formal documents of the Affirmative Action Plan and the effective implementation of the plan. Responsibility is likewise vested with each departmental manager and supervisor.

AAAPP's audit and reporting system is designed to:

- Measure the effectiveness of the AAP/EEO program;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which our AAP goals and objectives have been obtained.

The following activities are reviewed at least annually to ensure freedom from discrimination or stereotyping of individuals in any manner, including that which may limit their access to any job for which they are qualified:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, award of tenure, layoff, recall from layoff;
- Rates of pay and any other forms of compensation including benefits;
- Job assignments, job classifications, job descriptions, and seniority list;
- Sick leave, leaves of absence, or any other leave;
- Training, attendance at professional meetings, conferences; and
- Any other term, condition, or privilege of employment.

AAAPP's audit system includes a regular report documenting the efforts to comply with its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their

suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the EEO Coordinator.

- The EEO Coordinator will discuss any problems related to significant rejection ratios or EEO claims with the Executive Director; and
- The EEO Coordinator will report the status of AAAPP's AAP goals and objectives to the Executive Director and will recommend remedial actions, if any, for the effective implementation of the AAP.

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ESTABLISHMENT OF RESPONSIBILITY FOR AAP IMPLEMENTATION

EEO Coordinator's Responsibilities

In furtherance of AAAPP's commitment to Affirmative Action and Equal Employment Opportunity for individuals with disabilities and protected veterans, the EEO Coordinator has the responsibility for designing and ensuring effective implementation of AAAPP's AAP. These responsibilities include, but are not limited to:

1. The development of the AAP for individuals with disabilities and protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with AAAPP's affirmative action obligations;
3. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and separation actions occur;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
6. Keeping the Executive Director and other senior management of AAAPP informed of equal opportunity progress and problems within the company through quarterly reports;
7. Providing departmental managers with a copy of the Affirmative Action Program for Qualified Individuals with Disabilities and Qualified Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for individuals with disabilities and protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Auditing the contents of AAAPP's bulletin boards annually to ensure that compliance information is posted and is up-to-date;
10. Serving as liaison between AAAPP and enforcement agencies; and
11. Serving as liaison between AAAPP and organizations for individuals with disabilities and protected veterans.

Manager and Supervisor Responsibilities

Managers and supervisors are advised annually of their responsibilities under the company's AAP for individuals with disabilities and protected veterans and of their obligations to:

1. Review the AAAPP's affirmative action policy for individuals with disabilities and protected veterans with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
3. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when personnel actions (hiring, promotion, transfers, separations) occur; and
4. Review all employees' performance to ensure that nondiscrimination is adhered to in all personnel activities.

TRAINING TO ENSURE AAP IMPLEMENTATION

Training is provided to all personnel involved in the recruitment, screening, hiring, promotion, disciplinary, and related employment processes to ensure that the commitments made in AAAPP's Affirmative Action Plan are implemented.

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INVITATION TO SELF-IDENTIFY FOR PROTECTED VETERANS

AAAPP is subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, (VEVRAA) which requires affirmative action to employ and advance veterans in employment. VEVRAA prohibits discrimination and requires affirmative action in all personnel practices regarding protected veterans. The statute covers disabled veterans, Armed Forces service medal veterans, recently separated veterans, and other veterans who served during a war, or in a campaign or expedition for which a campaign badge has been authorized.

If you are a disabled veteran, recently separated veteran, other protected veteran or Armed Forces service medal veteran, we would like to include you under our affirmative action program. If you qualify as a disabled veteran, recently separated veteran, other protected veteran or Armed Forces service medal veteran and would like to be included under the affirmative action program, please let us know.

You may inform us of your desire to benefit under our affirmative action program at this time or at any time in the future.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the VEVRAA, as amended.

The information that you submit will be kept confidential, except that:

- Supervisors and managers may be informed regarding restrictions on the work or duties of disabled veterans, and regarding necessary accommodations;
- First aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and

- Government officials engaged in enforcing laws administered by OFCCP, or enforcing the Americans with Disabilities Act, as amended, may be informed.

AAAPP will take affirmative steps to employ qualified Vietnam era, special disabled, recently separated, and other protected veterans. AAAPP will take Affirmative Action to ensure that all employment practices are free of discrimination against certain veterans who served on active duty and special disabled veterans. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selective layoff, disciplinary action, separation, rates of pay or other forms of compensation, and selection for training, including apprenticeship. A complete written copy of our affirmative action plan is available for review by any employee or applicant for employment, during normal business hours in our Human Resources Department. Interested persons should contact the Human Resources Manager for assistance.

If you are a disabled veteran it would assist us if you tell us about:

- Any special methods, skills, and procedures that qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and
- Any accommodations that we could make that would enable you to perform the job, including special equipment, changes in the physical layout of the job, elimination of certain duties relating to the job, provision of personal assistance services or other accommodations.

This information will assist us in placing you in an appropriate position and in making accommodations for your disability.

INVITATION TO SELF-IDENTIFY FOR INDIVIDUALS WITH DISABILITIES

AAAPP is subject to Section 503 of the Rehabilitation Act of 1973, as amended, which requires affirmative action to employ and advance in employment qualified individuals with disabilities.

If you have a disability and would like to be considered under the affirmative action program, please tell us.

You may inform us of your desire to benefit under the program at this time and/or at any time in the future. This information will assist us in placing you in an appropriate position and in making any necessary accommodations for your disability.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with Section 503 of the Rehabilitation Act.

Information you submit about your disability will be kept confidential, except that:

- Supervisors and managers may be informed regarding restrictions on the work or duties of qualified individuals with disabilities, and regarding necessary accommodations;
- First aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment; and
- Government officials engaged in enforcing laws administered by OFCCP or the Americans with Disabilities Act, as amended, may be informed.

If you are a qualified individual with a disability, we would like to include you under our affirmative action program. It would assist us if you tell us about (i) any special methods, skills, and procedures that qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of

that kind, and (ii) any needed accommodations that would enable you to perform the essential functions of the job, including special equipment, changes in the physical layout of the job, elimination of marginal job duties relating to the job, provision of personal assistance services or other accommodations.

A written copy of our affirmative action plan is available for review by any employee or applicant for employment, during normal business hours in our Human Resources Department. Interested persons should contact the Human Resources Manager for assistance.

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