

**CITY OF COLUMBIA, MISSOURI
AFFIRMATIVE ACTION PROGRAM**

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City of Columbia, Missouri

AFFIRMATIVE ACTION PROGRAM

for

MINORITIES AND FEMALES

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City of Columbia, Missouri

AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND FEMALES

TABLE OF CONTENTS

- I. Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a))**
 - A. Designation of Responsibilities of AAP Administrator (Ordinance sections 19-177 and 19-179)
 - B. The Responsibilities of the Company's Management to Ensure Implementation of the AAP (Ordinance sections 19-178 and 19-180)
- II. Identification of Problem Areas (41 CFR 60-2.17(b))**
- III. Accomplishment of Prior Year Placement Goals (41 CFR 60-1.12(b), -2.1(c) and -2.16)**
- IV. The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))**
- V. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))**

I. Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a))

A. Designation of Responsibilities of AAP Administrator (41 CFR 60-2.17(a))

Margrace Buckler, the Human Resources Director, as the AAP Administrator, has the responsibilities as outlined on the following pages:

- **Sec. 19-177. - Goals and timetables.**

Based on statistical employee turnover rates and anticipated, projected changes in total work force allocations; and work force evaluation in terms of race, sex, job position, salary make-up, and related considerations, annual and long-range (if practicable) EEO affirmative action goals will be recommended by the director in consultation with the respective department heads, reviewed by the personnel advisory board, and adopted by the city manager as an administrative policy.

Documentation concerning the success of projected goal attainment shall be completed annually by the director, citing conditions and circumstances which may have helped or hindered the program.

Subsequent goals and timetables shall be established considering the practical experience and preceding goal success. Identifiable lack of good faith in attempting to achieve established goals shall be just cause of disciplinary action, and shall involve any and all employees.

(Code 1964, § 22.920)

- **Sec. 19-179. - Recruitment.**

(a)

EEO affirmative action will consist of active recruitment of female, disadvantaged, underemployed, and/or minority candidates for positions within the city at all levels.

(b)

Active recruitment will mean:

(1)

First consideration for filling all vacancies in a department shall be given to qualified employees of lower rank within the same department or qualified employees from other departments.

(2)

Identification of agencies and programs concerned with educational and employment opportunities for female and/or minority members.

(3)

Every effort will be made to contact a variety of agencies and individuals to identify prospective applicants, and notification will be made to such agencies of all new positions and the requirements of each as soon as each position becomes available.

(4)

All vacancies and new positions in city departments or agencies, not initially filled by a present city employee, shall be publicly advertised; and the statement "The City of Columbia is a merit, affirmative action, equal opportunity employer: Male/Female." shall be included wherever practicable in employment advertisements.

(c)

The director will place employment advertising in publications with a broad circulation so that a potentially large number of female and minority groups can be reached.

(d)

Systematic contact will be kept with the local state employment security commission office and community action agencies to encourage referral of applicants for positions.

(e)

Present employees are encouraged to refer female or minority applicants when positions are available.

(f)

The city will aggressively seek more female and minority candidates in classifications in which females and minorities are identified as underutilized by making it known to all recruitment sources that female and minority members are being sought for consideration when positions are available.

(g)

The director will continually review the employment situation to determine if:

(1)

There are any job categories which, in practical effect, are closed to female and minority groups;

(2)

Hiring practices indicate that all applicants are considered solely on the basis of their qualifications for the job openings for which they have applied;

(3)

The initial job in which a new employee is placed is determined or materially influenced by whether or not he/she is a member of a minority group;

(4)

Minimal entry qualifications are in fact necessary, valid, and justifiable in terms of acceptable and required performance levels;

and if problems exist in any of these areas, the director shall take the necessary actions to correct inequities.

(h)

The director will establish a system through which it is possible to verify the number of minority applicants and the number of minority workers newly employed or promoted in reference to the number of applications received, openings available, and salaries earned.

(i)

All qualifications for employment shall be fully job-related. Any tests given by the city, once reliably and validly established, will be equitable and identical for all applicants for a given position. Continuous review of the tests shall be conducted by the director to ensure their validity.

(j)

The qualifications of all employees, including females and/or those of minority background, will be reviewed regularly to ensure that qualified, interested individuals are considered for promotion and upgrading.

(k)

As many female and minority and/or disadvantaged trainees and summer part-time employees will be used as work needs justify and expenditures allow and shall be on a representative relationship to the general community as much as possible.

(Code 1964, § 22.940)

B. The Responsibilities of the Company's Management to Ensure Implementation of the AAP (41 CFR 60-2.17(a))

In implementing this written Affirmative Action Program, the responsibilities of the company's supervisors and managers working with the Human Resources Director include, but are not necessarily limited to, the following:

1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when appropriate;
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and
3. 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.

- **Sec. 19-178. - Program knowledge.**

The city will take the necessary steps to ensure that all department heads and other employees and all potential employees are advised of this policy of non-discrimination, and of the city's interest in actively and affirmatively providing equal employment opportunity. These steps will include (but are not limited to) the following:

(1)

A brief statement of the policy in all advertisements for employment.

(2)

Periodic dissemination of policy through the media, new employee orientation discussions, bulletin boards, etc.

(3)

Periodically advising all persons in a position within the city government of their role and responsibility in implementation of this policy.

(Code 1964, § 22.930)

- **Sec. 19-180. - Training.**

Female and minority employees as well as others will be encouraged to increase their skills and job potential through participation in training and education programs, and the city will regularly review and help to assure that such programs, when established or provided, are available to employees on an equal opportunity basis. The city will seek to have female and minority employees take advantage of training opportunities in numbers that are representative when compared to the size of the work force, and when training is available generally to other employees in the same classification within the parameters of departmental operations and an individual's capability to benefit from various types and degrees of training which may in some cases be significantly advanced and/or cumulative in nature.

(Code 1964, § 22.950)

II. Identification of Problem Areas (41 CFR 60-2.17(b))

City of Columbia, Missouri performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups may face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

1. **Placement Goals:** An analysis of incumbency versus availability is performed to determine whether there are problems of minority or female utilization. Whenever a problem exists, as defined by a statistical methodology, Placement Goals are set (see the Placement Goals report which follows this section).

Whether there are Placement Goals or not, steps will be taken to encourage and increase the percentage of qualified females and/or minorities applying for positions both externally and internally. These steps may include, but are not limited to the following:

- Working with hiring managers and recruiters to determine appropriate outreach to attract qualified applicant pools;
- Recruiting at colleges and universities with a significant percentage of minority and female students;
- Publishing job advertisements in newspapers and/or magazines that target females and/or minorities;
- Offering job training to females and minorities currently employed by the company in order to increase their chances of advancement;
- Offering tuition reimbursement to employees to obtain training that will increase their chances of advancement; and
- Continuing to use the services of the respective State Employment Service.

2. **Review of Employment Decisions:** Review of employment decisions is made in order to determine whether or not females/minorities are selected at a less favorable rate than males/non-minorities. A review of males/non-minorities is also conducted to determine if either group is being selected at a statistically significant lessor rate than females/minorities.

3. **Review of Hires/Promotions:** Whenever females/minorities are selected at a lower rate than males/non-minorities, a review of the applicant flow is conducted to determine possible reasons why females/minorities were not selected at a more favorable rate. If the company is attracting fewer than expected females/minorities that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified females/minorities. If males/non-minorities are selected at a statistically significantly lessor rate than females/minorities, a review of the applicant flow and selection decisions is also made to ensure that there is no evidence of discrimination.

4. **Review of Terminations:** For terminations, if females/minorities are being involuntarily terminated or are voluntarily leaving at a higher rate than males/non-minorities, a review of the employee files will be made to ensure the company is applying its policies and procedures for termination equally for protected as well as non-protected classes. If males/non-minorities have a statistically significant higher rate of termination than females/minorities, an investigation will also be conducted to determine the cause.

5. **Compensation:** Compensation is reviewed at least annually in order to determine if there are significant discrepancies in pay when comparing female to male rates of pay and minority versus non-minority rates of pay. If discrepancies do exist, a thorough review is conducted to determine if the difference in pay is justified due to appropriate factors. If the difference in pay cannot be justified, City of Columbia, Missouri will put a plan in place bring pay into greater alignment.

Placement Goals Report

<u>Job Group</u>		<u>Class</u>	<u>Goal Placement Rate %</u>
AO	OPERATOR	Female	26.17
AT	TECHNICIAN	Female	21.93
AT	TECHNICIAN	Minority	21.14
CP	PROFESSIONAL	Female	64.89
F	PUBLIC SAFETY	Female	60.28
F	PUBLIC SAFETY	Minority	27.60

III. Accomplishment of Prior Year Placement Goals (41 CFR 60-1.12(b), -2.1(c) and -2.16)

Where goals were established for the prior year, the company developed action-oriented programs designed to accomplish the established goals and objectives, thereby enhancing employment and advancement opportunities in the company for females and minorities. The results of the prior year's Affirmative Action Program are identified on the Goal Attainment report.

Goal Attainment Report

<u>Job Group</u>		<u>Class</u>	<u>Employees</u> <u>at</u> <u>plan date #</u>	<u>Goal</u> <u>Placement</u> <u>Rate %</u>	<u>Placements</u> <u>#</u>	<u>Actual</u> <u>Placement</u> <u>Rate %</u>	<u>Goal</u> <u>Attained ?</u>
AO	OPERATOR	Female	18	24.14	7	9.33	No
AT	TECHNICIAN	Female	27	17.58	3	9.09	No
AT	TECHNICIAN	Minority	10	22.69	0	0.00	No
CP	PROFESSIONAL	Female	55	58.96	10	66.67	Yes
F	PUBLIC SAFETY	Female	35	60.42	0	0.00	No
F	PUBLIC SAFETY	Minority	28	27.73	1	8.33	Yes

IV. The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))

Programs have been instituted to ensure no barriers to employment exist. These programs may include, but are not limited to, the following:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
2. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
3. Evaluating the total selection process to ensure freedom from bias through:
 - a. Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
 - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
 - c. Training personnel and management staff on proper interview and selection procedures; and
 - d. Training on EEO and other related policies for management and supervisory staff.
4. Using techniques to improve recruitment and retention and to increase the flow of qualified applicants, including minority and female applicants, City of Columbia, Missouri undertakes the following actions:
 - a. Includes the phrase "As an EEO/Affirmative Action Employer all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin. Veteran or disability status" Veterans, Disabled" or other acceptable tagline in all printed employment advertisements;
 - b. Places employment advertisements in local minority news media and women's interest media;
 - c. Disseminates information on job opportunities to organizations representing minorities and women and to employment development agencies when job opportunities become available;
 - d. Encourages all employees to refer qualified applicants;
 - e. Actively recruits at secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments; and

5. Reviews company's compensation practices;
6. Ensures that all employees are given equal opportunity for promotions and/or transfers. This is achieved by:
 - a. Posting opportunities internally;
 - b. Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
 - c. Evaluating job requirements to ensure that they are appropriate.

V. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))

The company believes that one of the most important elements in effectively implementing a written Affirmative Action Program is an adequate internal audit and reporting system. Through this system, the total program can be monitored for effectiveness, and management can be kept informed. City of Columbia, Missouri's audit and reporting system is designed to:

1. Measure the effectiveness of the AAP/EEO program;
2. Document and analyze personnel activities;
3. Identify problem areas and develop action plans where remedial action is needed;
and
4. Determine the degree to which AAP goals and objectives have been attained.

The following personnel activities are reviewed, as necessary and desirable, to ensure nondiscrimination and EEO for all individuals without regard to their race, color, gender, religion, national origin:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, upgrading, layoff, recall from layoff;
3. Rates of pay and any other forms of compensation including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

The following documents may be maintained as a component of City of Columbia, Missouri's internal audit process:

1. An applicant flow log;
2. Summary data of external job offers and hires, promotions, resignations, terminations;
3. Summary data of applicant flow;
4. Employment applications; and
5. Records pertaining to company's compensation system and decisions.

City of Columbia, Missouri's audit system includes periodic review of employment decisions. 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 AAP Administrator. During the reporting cycle, the following occurs:

1. The AAP Administrator will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
2. The AAP Administrator will report the status of the company's AAP goals and objectives to management. The AAP Administrator will recommend remedial actions for the effective implementation of the AAP.