

AFFIRMATIVE ACTION PROGRAMS

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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**

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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, has the primary management responsibility, authority, and resources for ensuring full compliance with the provisions of E.O. 11246, as amended, and with implementing all applicable regulations. The Human Resources Director's appointment and a description of the position's basic responsibilities have been communicated to all levels of personnel in the company. The responsibilities of the Human Resources Director include, but are not necessarily limited to, the following:

1. Developing EEO policy statements, Affirmative Action Programs, and internal and external communication procedures;
2. Assisting in the identification of AAP/EEO problems;
3. Assisting management in arriving at effective solutions to AAP/EEO problems;
4. Designing and implementing an internal audit and reporting system that:
 - a. Measures the effectiveness of the Affirmative Action program;
 - b. Determines the degree to which AAP goals and objectives are met; and
 - c. Identifies the need for remedial action
5. Keeping company's management informed of equal opportunity progress and reporting potential problem areas within the company through reports;
6. Reviewing the company's AAP for qualified minorities and women with all levels of management to ensure that the policy is understood and is followed in all personnel activities;
7. Auditing the contents of the company's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between City of Columbia, Missouri and enforcement agencies.

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.

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 mentorship programs for female and minority employees;
- 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;
- Using recruitment companies that specifically target females and minorities; 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 OPER	Female	23.85
AT TECH	Female	21.78
AT TECH	Minority	22.82
CP PROF	Female	63.49
F PBSF	Female	60.31
F PBSF	Minority	27.61

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	OPER	Female	25	24.77	8	13.11	No
AT	TECH	Female	17	21.54	2	4.65	No
AT	TECH	Minority	16	21.35	6	13.95	No
CP	PROF	Female	61	63.69	8	44.44	No
CP	PROF	Minority	11	12.76	1	5.56	No
F	PBSF	Female	31	60.42	12	21.43	No
F	PBSF	Minority	24	27.73	6	10.71	No

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

- f. Requests employment agencies to refer qualified minorities and women.
- 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.