

PROJECT DESCRIPTION

The Arrowhead Regional Development Commission, hereafter referred to as ARDC, was the first of 11 multi-county regional development organizations created in Minnesota by the Regional Development Act of 1969. ARDC's purpose is to serve the people of the Arrowhead Region by providing local units of government a means to work cooperatively in identifying needs, solving problems and fostering local leadership. Local governments and community-based groups can turn to ARDC for programs, services and staffing assistance. Its professional planners and project coordinators help clients improve their own communities by:

- Identifying and providing access to available resources
- Encouraging intergovernmental cooperation
- Providing a forum for issues that cross jurisdictions
- Gathering, analyzing and disseminating regional data
- Formulating and implementing regional strategies
- Analyzing and developing regional systems
- Facilitating decision-making and strategic planning processes
- Identifying and instituting innovative public management practices
- Assuming a leadership role on priority regional matters
- Delivering technical advice and assistance

ARDC's membership includes both elected officials and citizen representatives from throughout the Arrowhead Region. Programs are funded through a combination of federal and state dollars, and grants and fees paid by customers for services and contracts. Commission members meet quarterly to discuss regional priorities and set overall policy. A governing board meets monthly to monitor programs, revise budgets, approve contracts and expenditures and deal with other day-to-day issues as they arise.

POLICY STATEMENT

This is to affirm the Arrowhead Regional Development Commission's policy of providing Equal 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, specifically Minnesota Statutes 363.

The Arrowhead Regional Development Commission will not discriminate against or harass any employee or applicant for employment because of race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, or status with regard to public assistance.

The Arrowhead Regional Development Commission 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, selection, layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship or internship.

The Arrowhead Regional Development Commission will commit the necessary time and resources, both financial and human, to achieve the goals of Equal Employment Opportunity and Affirmative Action.

The Arrowhead Regional Development Commission fully supports incorporation of nondiscrimination and Affirmative Action rules and regulations into contracts.

The Arrowhead Regional Development Commission will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these Affirmative Action objectives as well as other established criteria. Any employee of this organization, or subcontractor to this employer, who does not comply with the Equal Employment Opportunity Policies and Procedures as 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, specifically Minnesota Statutes 363 will be subject to appropriate legal sanctions.

The Arrowhead Regional Development Commission has appointed Mary Zanoni to manage the Equal Employment Opportunity Program . Her 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. The Executive Director of the Arrowhead Regional Development Commission will receive and review reports on the progress of the program. If any employee or applicant for employment believes he/she has been discriminated against, please contact Mary Zanoni, Arrowhead Regional Development Commission, 221 West First St., Duluth, MN 55802, or call 218/529-7543.

Executive Director

Date

ASSIGNMENT OF RESPONSIBILITY FOR AFFIRMATIVE ACTION PROGRAM

As part of ARDC's efforts to ensure equal employment opportunity and implement affirmative action for employees and applicants, specific responsibilities have been delegated to the Executive Director and his administration. These responsibilities include, but are not limited to the following:

Executive Director

- Delegate the responsibility for overseeing, administering, implementing and monitoring the Affirmative Action Plan to the Affirmative Action/Equal Opportunity Officer.
- Ensure that those personnel designated for components of the Affirmative Action Plan are given staff and resources necessary to implement successfully their assigned duties.
- Incorporate into the position description of all administrators and supervisors a clear description of their responsibilities in the area of affirmative action/equal opportunity and include an evaluation of the performance of these responsibilities as part of the annual performance review.
- In collaboration with the Affirmative Action Officer, make recommendations for action that address EEO/AA issues.
- Provide the Board with an annual summary of the agency's accomplishments in meeting goals set during the previous year.
- Impart personal direction that assures involvement and commitment to affirmative action/equal employment opportunity.

Affirmative Action Officer

The Affirmative Action Officer, who reports directly to the Executive Director, is responsible for developing and monitoring the affirmative action program and reporting progress to the agency. Her duties include, but are not limited to the following:

- Develop ARDC's EEO/AA policy statement and Affirmative Action Plan consistent with our policies and establish our affirmative action goals and objectives.
- Ensure that the agency is in compliance with federal, state and local laws, regulations and policies pertaining to affirmative action/equal opportunity and is responsible for overall implementation and administration of the agency's equal employment opportunity programs.
- Serve as the agency's primary resource on affirmative action/equal opportunity laws, regulations and procedures.

- Implement the Affirmative Action Plan/Program including internal and external dissemination of our EEO/AA policies and plan.
- Conduct and/or coordinate EEO/AA training and orientation of our supervisors, managers and subcontractors to inform them of their responsibilities pursuant to the Affirmative Action Plan/Program.
- Engage in periodic discussions with management, supervisors and other personnel to ensure that they are aware of their responsibilities to take action to prevent the harassment of protected class employees and applicants for employment and that our equal opportunity policies are being followed.
- Keep management informed of the latest developments in the area of EEO.
- Ensure that all minority and female employees are provided equal opportunity as it relates to organization-sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions without regard to race and sex.
- Monitor and audit employment practices to ensure that they are in compliance with ARDC policy, federal and state laws and regulations governing equal employment opportunity and affirmative action.
- Design, implement and audit a report system that will measure the effectiveness of the Affirmative Action Plan, indicate the need for remedial actions, if any, and assess attainment of goals and objectives.
- Maintain, monitor and measure our progress toward meeting our affirmative action goals and advise the Executive Director.
- Receive, review, investigate and process complaints or discrimination, sexual/gender harassment, sexual orientation/affection preference, racial and disability harassment, and/or lack of equal opportunity in accordance with established guidelines.
- Serve as liaison between the agency and relevant or applicable governmental enforcement agencies.
- Serve as liaison between protected class groups and ARDC.

Management Team

Administrative supervisors, in day-to-day contact with staff are assigned certain responsibilities within their functional area to ensure compliance with equal employment opportunity policies and to implement affirmative action. Such responsibilities are recognized and subject to performance evaluation. The responsibilities include adhering to the agency's nondiscrimination policy and assisting in the implementation of the Affirmative Action Plan by exercising good faith efforts for meeting established commitments to equal employment opportunity and

affirmative action goals. In addition, the responsibilities include, but are not limited to, the following:

- Assist the Affirmative Action Officer in identifying and resolving problems and eliminating barriers which inhibit equal employment opportunity, including providing reasonable accommodations for applicants and employees.
- Follow the pre-employment hiring process, reviewing the qualifications of all applicants and employees to ensure that women and persons of color are given full opportunities for hiring, promotions and other employment benefits.
- Assure that all affirmative action/equal opportunity policies, plans and procedures are complied with and carried out in their respective divisions.
- Communicate the agency's affirmative action plan to division employees and incorporate into the performance evaluation of subordinate supervisors.

DISSEMINATION OF EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICIES

The Arrowhead Regional Development Commission's commitment to equal employment opportunity and affirmative action is communicated in the following ways:

Internal Dissemination

- Our policy statement and non-discrimination posters will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment throughout the agency.
- Our EEO/AA policy statement will be published in our newsletters, brochures, annual reports and communicated to our employees in the same manner that other major personnel policies or decisions are communicated.
- Our EEO/AA policies will be included in our policy manual and employee handbook.
- All executive, management and supervisory staff will be furnished a full copy of our Affirmative Action Program/Plan and amendments.
- Each employee will be furnished a copy of the policy statement and have access to the Affirmative Action Plan/Program. This policy will be made available to all employee including part-time, associate, temporary and interns.
- An explanation about our EEO/AA policy will be incorporated into our orientation for new employees, and training sessions will be conducted to inform all current employees of our EEO/AA commitment and of individual responsibility for effective implementation.
- All job postings and announcements will identify ARDC as an equal opportunity employer.
- Our EEO/AA policy and plan will be posted on the Intranet, the internal agency website.

External Dissemination

- Recruitment materials and employment advertising will specify that ARDC is an equal employment opportunity/affirmative action employer.
- Inform recruiting sources and prospective employees of ARDC of our equal employment opportunity and affirmative action policy in its recruitment and hiring practices.
- Our EEO/AA policy and plan will be posted on the internet, the agency's external web site.
- Notice of ARDC policy on equal employment opportunity and affirmative action is provided to all contractors, vendors and suppliers. Where appropriate, an equal employment opportunity clause is included in contractual agreements.
- All publications or other promotional materials as well as agency stationery letterhead will contain an equal opportunity employment statement.

Staff Organization Chart

Insert Page Here

Workforce Analysis
Admin Sheet Here

Workforce Analysis
Department / Organization Unit
Insert Here

(Continued for MIC Here)

(Continued for America's Byways Resource Center)

(Continued for Area Agency on Aging)

Availability / Utilization / Underutilization Analysis

Insert Here

GOALS

It is our annual goal to achieve an employment rate of women and minorities equal to the availability percentage in each job group that we are underutilized in.

PROBLEM/DEFICIENCY AREAS

1. **Workforce Composition:** We have a total of 55 employees, 35 females and 1 minority. The number underutilized for females in all job groups is 0. We do not have a problem in this area. The number underutilized for minorities in Managerial, Technical and Office/Clerical job groups is 0. We do not have a problem in this area. However, the number underutilized for minorities in the Professional job group is 1. We do have a deficiency in the Professional job group, which must be addressed.
2. **Applicant Flow Composition:** Effective Jan. 1, 2003, we will have a process in place to track applicant flow. It is rare that we have an applicant come in to fill out an application. Applicants either send in their resumes for job consideration or will be able to apply for open positions on-line. A form will also be available on-line that allows applicants to voluntarily supply us information to accommodate record keeping on the number of females, minorities, disabled individuals and veterans that have applied. We will also be able to track persons interviewed for positions, those hired, promoted, placed on lay-off status, recalled from lay-off, demoted, terminated, transferred and employees who have participated in company sponsored training.
3. **Total Selection Process:** Each time there is an open position, supervisors are coached and trained in areas of recruitment, employment interviews, reference checks and selection. The Human Resource Manager is involved in every step of the process, although the final decision is made by the hiring supervisor. Procedures have been developed that are nondiscriminatory and meet applicable laws.
4. **Transfer and Promotion Procedures:** Transfer and promotion procedures are outlined in the Agency's Employee Handbook and follow specific guidelines to avoid discriminatory practices.
5. **Company Facilities and Company Sponsored Activities:** Company facilities and activities are available to all employees. Practices do not discourage participation or access by any group of employees.
6. **Seniority Practices:** This factor does not apply.
7. **Apprenticeship Program:** This factor does not apply
8. **Employer Training Programs:** All employees are given opportunities to participate in company training programs as applicable to job duties.
9. **Workforce Attitude:** ARDC's policy on equal employment opportunity and affirmative action is included in the Employment Handbook which is provided to every employee on their first day of employment. All directors, supervisors and board members have been made aware of the Agency's Affirmative Action Program and its commitment to nondiscrimination in all employment practices. Copies of the policy have been distributed to all Board members and Division directors. Information explaining the Agency's Affirmative Action Program has been distributed through our Agency newsletter.

10. Posters, Application Retention and Subcontractor Notification: Information has been posted on the Agency bulletin board notifying staff and visitors of the existence of the Affirmative Action Policy and the location of the complete plan. Applications and resumes are retained for two years. Subcontractors are notified of the Affirmative Action requirements.

IMPLEMENTATION OF EQUAL EMPLOYMENT POLICY AND AFFIRMATIVE ACTION PROGRAMS

The Arrowhead Regional Development Commission Affirmative Action Plan is designed to insure employment-related opportunities to minority and female employees. Our Affirmative Action goals reflect a realistic approach toward achievement. We recognize that the ultimate success of this undertaking will be largely the result of the good faith efforts detailed in this plan of action.

A. Recruitment and Selection

- ARDC informs prime recruiting resources verbally and in writing at least annually of our EEO policy and maintains a file of sources identified.
- ARDC actively encourages recruitment of female and minority candidates for existing and expected employment opportunities and conduct focused recruiting and networking with colleagues to identify and recruit qualified people, particularly women and people of color, when they are under represented.
- Women are fairly represented on the staff and as employment interviewers.
- Job vacancy notices are reviewed to ensure that the education, experience, skill, knowledge and abilities required for each position are limited to those directly related to the satisfactory performance of the duties and responsibilities of the position.
- The application form does not request information that could be used to discriminate in any way.
- The Voluntary Information Form for specifying gender, ethnicity, veteran and disabled status is strictly voluntary and is not provided to hiring supervisors. The information gathered is used only for purposes of ensuring nondiscrimination.
- All open positions are posted on the ARDC employee bulletin board and on the internal and external web site. Employees are considered for promotion based upon qualification and skill level. Where additional training and experience would be helpful for advancement, management counsels and assists employees.
- The Human Resource Manager/Affirmative Action Officer and the hiring supervisor are responsible for the review of all job descriptions used to post and advertise job vacancies to ensure they accurately reflect job responsibilities and qualifications.
- ARDC uses only job-related criteria in selecting the candidate best suited for each position.
- The minority and gender composition of applicants and hires is reviewed periodically to assure that sufficient numbers are applying for jobs and to assure that the selection process is not adversely affecting ARDC's ability to meet its affirmative action obligations.
- Valid skill tests are used only for jobs that require demonstrated skills.
- The ARDC application form contains the following notice: "Equal access to programs, services and employment is available to all persons. Those applicants requiring reasonable accommodation to the application and/or interview process should notify the Human Resources Manager. As an Equal Opportunity Employer, we consider all applicants for positions."

B. Training

- Review and briefing sessions are conducted with all hiring supervisors and managers to inform them of the Affirmative Action Plan and the pre-employment process.
- Supervisors, managers and employees will be apprised of current changes, issues and other pertinent information relating to affirmative action/equal opportunity and protected group members through management team and staff meetings, quarterly newsletters, emails and handouts. Additional training will be provided if necessary.
- All new employees are advised of the Affirmative Action Plan, which is intended to advance equal employment opportunities in all employment practices including hiring, performance evaluation, career development and promotions, as well as the harassment policy and steps for filing discrimination complaints.
- Job-related training opportunities, formal and informal, are open to all employees to provide them opportunities to develop to their fullest potential, thus benefiting employees and ARDC mutually.

AUDITING AND REPORTING SYSTEM

The following reporting and auditing system will be used by the Arrowhead Regional Development Commission to ensure compliance with legal requirements and monitor the effectiveness of its Affirmative Action Plan:

- Summary data relating to the entire personnel process will be maintained in the HRIS system and updated at regular intervals. The personnel transactions monitored include applications, new hiring, promotions, transfers, and terminations. The EEO Coordinator/Human Resources Manager will be responsible for collecting and maintaining the data. Reports will be generated off the HRIS system. The transactions will be analyzed quarterly by the EEO Coordinator to measure goal achievement and make recommendation for action to be taken to alleviate any problems. Figures for these personnel processes will show a breakdown by gender, minority and disability classification. Activities affecting veterans and handicapped individuals will also be monitored and audited.
- A record will be kept of all recruitment resources used and results of recruitment strategy for each new hire for which there was under-representation.
- A record will be kept of all formal discrimination complaints filed in the past quarter.
- A record will be kept of all training provided to employees. These records are analyzed by job classification, racial/ethnic group, gender, and disability.
- The Human Resources Manager approves and maintains an ongoing system to ensure the equitable assignment of salary ranges within ARDC. All salary increases that do not specifically fall within company policy and procedure are monitored by Human Resources to ensure fair and equitable pay practices by management.
- The EEO Coordinator and Executive Director will meet to review the annual Affirmative Action Program before presentation to the Board and Commission for approval.
- An EEO Committee meets as necessary to ensure and review efforts toward the accomplishment of EEO goals and objectives, to evaluate progress, to identify potential barriers to goal accomplishment and to recommend action to eliminate those barriers and ideas of new ways to proceed. This committee is made up of the ARDC Management Team and is chaired by the EEO Coordinator.
- Annual Compliance Reports will be submitted to the Minnesota Department of Human Rights by the ARDC EEO/AA officer.

AFFIRMATIVE ACTION PROGRAM FOR HANDICAPPED, DISABLED VETERANS AND VETERANS OF THE VIETNAM ERA

The Arrowhead Regional Development Commission (ARDC) shall not discriminate against any employee or applicant for employment because of physical or mental disability, disabled veteran status or a veteran of the Vietnam Era in regard to any position for which the employee or applicant for employment is qualified. ARDC agrees to take affirmative action to employ, advance in employment and otherwise treat qualified disabled individuals and veterans without discrimination based upon their physical or mental disability in all employment practices such as the following: employment, upgrading, demotion or transfer, recruitment, advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training.

ARDC agrees to comply with the rules and relevant orders of the Minnesota Department of Human Rights issued pursuant to the Minnesota Human Rights Act. ARDC agrees to post in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the commissioner of the Minnesota Department of Human Rights. Such notices shall include the rights of applicants and employees in regards to ARDC's obligation under the law to take affirmative action to employ and advance in employment qualified disabled employees and applicants for employment.

Schedule for Review

ARDC will review all physical and mental job requirements annually to the extent that these requirements tend to screen out qualified disabled veterans, veterans of the Vietnam Era, and handicapped individuals. It will be determined whether these requirements are job related and consistent with business necessity and the safe performance of the job.

Pre-Employment Medical Exams

ARDC may require a comprehensive medical exam after conditional offer of employment. The results of such an examination will not be used to screen out qualified disabled individuals. Information obtained in response to such inquiries or examination shall be kept confidential except that (a) supervisors and managers may be informed regarding restrictions on the work or duties of disabled individuals and regarding accommodations, (b) first aid and safety personnel may be informed, where and to the extent appropriate, if the condition might require emergency treatment, and (c) officials, employees, representatives, or agents of the MN Department of Human Rights or local human rights agencies investigating compliance with the act or local human rights ordinances shall be informed if they request such information.

Accommodations to Physical and Mental Limitations of Employees

ARDC will make a reasonable accommodation to the physical and mental limitations of an employee or applicant unless such an accommodation would impose an undue hardship on the conduct of the business.

Compensation

In offering employment or promotions to disabled individuals, ARDC will not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source.

Outreach, Positive Recruitment, and External Dissemination of Policy

ARDC will review employment practices to determine whether the personnel programs provide the required affirmative action for employment and advancement of qualified disabled individuals, veterans and veterans of the Vietnam Era. Based upon the findings of such review, ARDC will undertake appropriate outreach and positive recruitment activities, such as those listed below:

- A. Notify local recruiting sources in writing of our policy, enlisting their support to assist us in providing meaningful employment opportunities to qualified individuals with disabilities.
- B. Develop reasonable internal procedures to ensure that the obligation to engage in affirmative action to employ and promote qualified disabled individuals is being fully implemented.
- C. Periodically inform all employees and prospective employees of the commitment to engage in affirmative action to increase employment opportunities for qualified disabled individuals, disabled veterans and veterans of the Vietnam era.
- D. ARDC has taken affirmative action to facilitate working conditions for the handicapped by ensuring that our building accommodates the needs of handicapped persons and disabled veterans.

Internal Dissemination of Policy

In order to assure employee cooperation and participation as well as adequate internal support from supervisory and management personnel and other employees, who may have limited contact with persons with disabilities, ARDC shall disseminate the policy internally as follows:

- A. The policy is included in the policy manual as well as posted on the bulletin board.
- B. Meetings are held with appropriate personnel to ensure understanding and commitment to the policy.
- C. Inform employees of the policy and explain individual employee responsibilities in employee orientation and training programs.

Responsibility for Implementation

Affirmative Action for veterans of the Vietnam Era and disabled veterans (both groups hereinafter referred to as "Protected Veterans") and for the handicapped is the responsibility of every employee of ARDC. The Plan's EEO Executive, John Chell, is responsible for implementation and monitoring of the Affirmative Action Program for the handicapped and protected veterans of the Plan. In carrying out this responsibility he will:

Develop policy statements, affirmative action programs and internal and external modes of communication;

Identify, with management, problem areas in implementing the affirmative action program, and develop solutions, including possible accommodation;

Determine the degree to which the Plan's objectives have been attained and determine whether known handicapped employees and protected veterans have had the opportunity to participate in all Plan-sponsored educational training, recreational and social activities;

Serve as liaison between the Plan and enforcement agencies, and between the Plan and organizations of and for handicapped persons and protected veterans;

Keep management informed of the latest developments in the entire affirmative action area regarding both handicapped and protected veterans;

Ensure that the establishment is in compliance with the relevant legal regulations.

Development and Execution of Affirmative Action Programs for Handicapped, Disabled Veterans and Veterans of the Vietnam Era

The Affirmative Action Plan for ARDC shall be developed and executed as follows:

- Job qualification requirements have been reviewed and made available to all members of management involved in the recruitment, screening, selection and promotion process, and they have been trained to ensure that there is a commitment to the affirmative action program and its implementation.
- ARDC will evaluate the total selection process including training and promotion to ensure that disabled persons are not stereotyped in a manner that would limit their access to any jobs for which they are qualified.
- Certain barriers to our recruitment efforts exist and contribute to our ability to recruit disabled veterans and the handicapped. Among these barriers is an inability to identify disabled veterans who are seeking employment and the unavailability of qualified handicapped individuals.
- We are a small agency and have only one personnel position; therefore, we cannot include a disabled person in such a capacity at this time.
- When recruitment is necessary, ARDC will try to attract qualified disabled persons.
- ARDC will use all available resources to continue with our current on-the-job training.

Executive Director

EEO Officer

Date

Date