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| A picture containing logo  Description automatically generated | Policy Subject: | **Equal Employment Opportunity** | |
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CareLink maintains a strong policy of equal employment opportunity. Equal employment opportunity means that CareLink makes employment decisions without regard to race, color, religion, sex, national origin, age, disability, or sexual orientation. This philosophy applies to all aspects of employment including recruiting, hiring, training, promotion, compensation, and termination.

EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION

1. Civil Rights Compliance

The Area Agency on Aging complies with Equal Employment/Affirmative Action statutes of Title VI of the Civil Rights Act of 1964. The Area Agency on Aging has developed and implemented an Affirmative Action plan which is presented at least annually during an agency-wide staff meeting. The Area Agency on Aging also complies with Section 504 of the Rehabilitation Act of 1973 as an applicable regulation regarding nondiscrimination in employment. Complaints of discrimination on the basis of handicap in employment may be filed with the Office for Civil Rights of the Department of Health and Human Services. In addition to federal law, CareLink complies with all state laws and local or municipal ordinances, including those that prohibit discrimination in regard to marital status, sexual orientation, gender identity, or genetic information.

# II. Affirmative Action Plan Policy Statement

The Central Arkansas Area Agency on Aging is committed to the concept and practice of equal opportunity in employment. This concept embodies the parallel objectives of non-discrimination and full equality of opportunity.

The Agency’s commitment is and will continue to be supported by positive and progressive practical policies and procedures designed to ensure non-discrimination and equality of opportunity for racial minorities and women, both in securing employment with the Agency and most importantly, with providing services to clients of the Agency.

It has been and will continue to be the policy of the Agency to provide equal opportunity to all applicants for employment and to administer all personnel policies and practices such as those involved in recruiting, hiring, promotions, reassignments, and any other practices in a manner which does not discriminate on the basis of race, color, creed, ancestry, national origin, sex, marital status, religion, handicap, age, or sexual orientation except where age or sex is a bona-fide occupational qualification.

The Agency’s Equal Opportunity Policy is in accord with the laws of the United States and reaffirms the Agency’s continuing commitment to provide equal opportunity to all employees and clients with respect to personnel policies and services.

The basic Affirmative Action Equal Opportunity Policy is designed to serve several important objectives as follows:

1. To provide for equal employment opportunity for its employees in all matters falling within the purview of the governing body.
2. To employ minority persons in numbers sufficient to bear a reasonable relationship to the proportion of minority population residing within the service area and in numbers to create close proportionality with the percentage of minority persons in the labor force in positions similar to those established by the Agency.
3. To develop and carry out plans and programs oriented toward bringing about equal opportunity for all persons both in employment and services without regard to race, color, religion, sex, marital status, creed, national origin, ancestry, handicap, age, or sexual orientation.
4. To make continuous planning and monitoring efforts to eliminate and prevent the occurrence of arbitrary discriminatory practices and policies relating to employment, personnel practices or services.
5. To make information on the Affirmative Action/Equal Employment Policy/Plan available to all employees, and available upon request to clients and others having a legitimate interest in the Agency’s non-discrimination policies and practices.

The Central Arkansas Area Agency on Aging commits itself to comply with all Federal, State and local legislation, Presidential Executive Orders and court decisions relating to equal employment opportunity.

**III. PAY TRANSPARENCY NONDISCRIMINATION**

The Central Arkansas Area Agency on Aging will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the Central Arkansas Area Agency on Aging’s legal duty to furnish information.

**AFFIRMATIVE ACTION PLAN**

1. **Evaluation of the Current EEO Program**

The current EEO plan has provided the basis for continuing effort in employment and related personnel actions of the Central Arkansas Area Agency on Aging, assuring minorities, older persons and women equal employment opportunities.

With the approval of the Board of Directors, this plan will be in effect until revised or updated.

The Area Agency has a staff development program, stresses upward mobility, advertises vacancies as appropriate, and documents fully its hiring and promotional actions.

It is the intent of this plan to continually stress affirmative action and equal employment opportunities.

**Development, Communication, and Administration of the Affirmative Action Program**

## Development

Objective: Assure a continuous process of reviewing the Affirmative Action Program to insure equal employment opportunities for job applicants and employees.

A. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Annually identify EEO problems and recommend improvement in the AA program to the President/CEO ~~for consideration by the Board of Directors.~~ | Human Resources | December 31 each calendar year |
| 1. Designate an EEO Coordinator with specific responsibilities. | Human Resources | December 31 each calendar year |

B. Evaluation Procedure:

1. Document the review of the Affirmative Action Plan by Department Directors.
2. Review EEO Coordinator records of all EEO activities.

Communication

Objective: Insure internal and external communication of the Affirmative Action Plan.

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Conduct a policy orientation for all Directors and Supervisors at least annually. | EEO Coordinator | Annually |
| 1. Display a statement of Equal Employment Opportunity and non-discrimination on the bulletin board. | EEO Coordinator |  |
| 1. Describe the Equal Employment Opportunity policy in the Personnel Policies and Procedures Handbook. | EEO Coordinator |  |
| 1. Provide the EEO policy to job applicants, job referral sources, and agencies interested in minorities, women, older people, and handicapped individuals on request. | EEO Coordinator | As needed |
| 1. Continually review recruitment, employment and promotion policies to determine if there is an adverse impact on minorities, older workers, and women, and to correct any policies to eliminate items that might be causing adverse impact. | EEO Coordinator | As needed |

1. Evaluation Procedure:
2. ~~Maintain a file containing all AA memos from the President/CEO to employees.~~
3. Check the bulletin board for display of the EEO policy.
4. Check personnel policies for inclusion of the EEO policy.
5. Keep a record of all requests and dates of issuance of the Agency’s AA policy.

Administration

Objective: Assure overall program administration through the coordination of the Affirmative Action Plan

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Assign the designated EEO Coordinator the following duties and responsibilities: 2. Assist Department Directors and Supervisors in complying with the Affirmative Action Plan in all personnel matters. 3. Conduct studies to determine strengths and weaknesses of the AA plan 4. Monitor revisions of the Affirmative Action plan 5. Advise and counsel Department Directors and employees to resolve complaints informally. | President/CEO | Annually  Continually  As needed  As needed  As needed |

1. Evaluation Procedures
2. Document the activities of the EEO Coordinator.
3. **Job Structuring and Upward Mobility**

Objective: Insure that job descriptions are accurate and contain only job-related requirements.

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Review job descriptions periodically and revise as needed | Department Directors/HR | Annually or as needed |
| 1. Continually update job descriptions to accurately reflect the duties being performed by employees of the Agency, and make certain that new employees are given position descriptions that will clearly outline those duties they will be expected to perform. | Department Directors | As needed |
| 1. Continual work force utilization reviews to determine the extent in which full utilization of minorities, older workers, and women are made, and to correct and eliminate any underutilization noted in assignments of these groups. | EEO Coordinator | ~~June 30 of each calendar year~~ July 31 for prior FY. |

1. Evaluation Procedure:
2. Document review and revision of job descriptions.

Objective: Facilitate career development for each employee

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Provide and facilitate utilization of training and educational opportunities. | Department Director | As needed |

1. Evaluation Procedure

1. Document employee training

**Recruitment**

Objective: Recruit job applicants on a non-discriminatory basis.

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Maintain a list of agencies and organizations to which recruitment efforts will be directed to reach qualified minority, older, and handicapped persons. | EEO Coordinator | Continuous |
| 1. Notify the listed agencies and organizations of job openings and procedures for making application if needed for securing applicants. | Human Resources | As vacancies occur |
| 1. Advertise vacancies at least one time in a newspaper where the positions are located, including the phrase “Equal Opportunity Employer” in the advertisements, if needed for securing applicants. | Human Resources | As vacancies occur |

1. Evaluation Procedure
2. Maintain list and revisions in EEO Coordinator’s files
3. Include copies of notification letters in the file maintained on each vacancy.
4. Place a copy of the ad with the phrase “Equal Opportunity Employer” in the file maintained on each position or vacancy filled.

**Selection, Appointment and Placement**

Objective: Insure that selection, appointment, and placement is made on a non-discriminatory basis.

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Applicants will be selected by a review of specific educational requirements, length and quality of work experience and a pre-selection interview. | Department Directors and Supervisors | When vacancy occurs |
| 1. Job vacancy files will be maintained on openings including all applicants for the listed vacancies. | Department Directors and Supervisors | When vacancy occurs |

1. Evaluation Procedure
2. Rating procedures, applications, job vacancy notices will be maintained for review.
3. Knowledge, skills and abilities needed to evaluate candidates for employment will be included in the file.

**Other Personnel Actions**

Objective: Insure personnel actions not otherwise referred to in this Affirmative Action Plan are communicated and provided on a non-discriminatory basis.

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Ensure that each employee is aware of the ~~written grievance~~ procedure for reporting ~~employees outlining specific actions to be taken should~~ a staff problem or allegation of discrimination ~~arise~~. | EEO Coordinator | Annually |
| 1. Evaluate job performance no less than annually, and more often if performance is substandard, and always as prerequisite to a raise or promotion. | Department Directors and Supervisors | Ongoing |
| 1. Review all policies and procedures relating to fringe benefits including leave, insurance policies, and retirement plans to assure availability on a non-discriminatory basis. | EEO Coordinator Comptroller | As needed |

B. Evaluation Procedure

1. Place copies of performance evaluations in each employee’s personnel file.
2. Document proceedings of this review and disposition of recommendations.
3. **Training**

Objective: Provide training in the Agency’s Equal Employment Opportunity program and training opportunities to employees.

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Provide training to all staff on the Affirmative Action Plan and the overall Equal Employment Opportunity Program. | EEO Coordinator | Annually |

1. Evaluation Procedure
2. Maintain a file on all staff training.

**VIII. Evaluation**

Objective: Review and evaluate the Affirmative Action Plan and Equal Employment Opportunity Affirmative Action Program and revise as necessary but no less than annually.

1. Specific Action Steps

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| **Specific Action Steps** | **Assignment of Responsibility** | **Target Date for Completion** |
| 1. Review and evaluate on a regular basis all Equal Employment Opportunity Affirmative Action program activities. | EEO Coordinator  President/CEO  ~~Board of Directors~~ | Annually |
| 1. Review and evaluate the Affirmative Action Plan at least annually, revising the Plan as necessary to adjust equitably to economic and social changes with particular emphasis on the status of minorities, women, older persons, and handicapped individuals. | EEO Coordinator  President/CEO  ~~Board of Directors~~ | Annually |

1. Evaluation Procedure
2. Document findings and revisions in Affirmative Action Plan file
3. Include the revised Affirmative Action Plan in the Area Plan