



# **NATCHITOCHES PARISH SHERIFF'S OFFICE**

## **Human Resources Division**

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Post Office Box 266, Natchitoches, LA 71457  
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### **Affirmative Action Program for Protected Veterans**

### **Affirmative Action Program for Individuals with Disabilities**

### **Affirmative Action Program for Executive Order 11246**

**July 2020 – June 2021**

# Natchitoches Parish Sheriff's Office



## AFFIRMATIVE ACTION PROGRAM (AAP) FOR VEVRAA

**Plan Effective Date:** July 01, 2020

**Plan Expiration Date:** June 30, 2021

**AAP Administrator:** Joe Hamilton, Human Resources Director

**Approved by:** R. Stuart Wright, Sheriff

**Establishment's Name:** Natchitoches Parish Sheriff's Office

**Establishment's Address:** 200 Church Street, Suite 100 Natchitoches, LA 71457

## Natchitoches Parish Sheriff's Office

## AFFIRMATIVE ACTION PROGRAM for PROTECTED VETERANS

### CONFIDENTIAL TRADE SECRET MATERIALS

The material set forth in the AAP is deemed to constitute trade secrets, operations information, confidential statistical data, and other confidential commercial and financial data, within the meaning of the Freedom of Information Act, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

### TABLE OF CONTENTS

- I. Equal Employment Opportunity (EEO) Policy Statement (41 CFR 60-300.44(a))
- II. Review of Personnel Processes (41 CFR 60-300.44(b))
- III. Review of Physical and Mental Job Qualification Standards (41 CFR 60-300.44(c))
- IV. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-300.44(d))
- V. Anti-Harassment Procedures (41 CFR 60-300.44(e))
- VI. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-300.44(f))
- VII. Internal Dissemination of Policy (41 CFR 60-300.44(g))

VIII. Audit and Reporting Systems (41 CFR 60-300.44(h))

IX. Responsibilities for Implementation (41 CFR 60-300.44(i))

- A. Responsibilities of Human Resources Director
- B. Responsibilities of Managers and Supervisors

X. Training (41 CFR 60-300.44(j))

XI. Applicants and Hiring Data (41 CFR 60-300.44(k))

XII. Hiring Benchmarks (41 CFR 60-300.45)

## **I. Equal Employment Opportunity (EEO) Policy Statement (41 CFR 60-300.44(a))**

The EEO Policy Statement on the following page is posted on our agency's bulletin board along with our required employment posters and is viewable by both employees and applicants. The EEO is the Law poster is also posted on our agency's bulletin board as well as made available electronically through our agency website for viewing by online applicants.

### **Natchitoches Parish Sheriff's Office**

## **EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT**

It is the policy of Natchitoches Parish Sheriff's Office not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, national origin, or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereafter referred collectively as "protected veterans." It is also the policy of Natchitoches Parish Sheriff's Office 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, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the agency will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

Natchitoches Parish Sheriff's Office prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. Natchitoches Parish Sheriff's Office also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As Sheriff of Natchitoches Parish Sheriff's Office, 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 agency, Joe Hamilton has been assigned Human Resources Director duties for Natchitoches Parish Sheriff's Office. One of the Human Resources Director's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of Natchitoches Parish Sheriff's Office's programs.

In furtherance of Natchitoches Parish Sheriff's Office's policy regarding affirmative action and equal employment opportunity, Natchitoches Parish Sheriff's Office has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that Natchitoches Parish Sheriff's Office is 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 AAP is available for inspection by any employee or applicant for employment upon request between 9:00 am - 4:00 pm at the Human Resources department. Any questions should be directed to me, your supervisor, or Joe Hamilton, Human Resources Director.

  
R. Stuart Wright

Sheriff

Natchitoches Parish Sheriff's Office

July 01, 2020

## **II. Review of Personnel Processes (41 CFR 60-300.44(b))**

Natchitoches Parish Sheriff's Office complies with the requirement to "periodically review" its personnel processes by reviewing these processes annually to determine whether its present procedures assure careful, thorough, and systematic consideration of the qualifications of known protected veterans. As part of this review, Natchitoches Parish Sheriff's Office also ensures that its personnel processes do not stereotype protected veterans in a manner which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

The following is a set of procedures which may be used to meet the requirements of 41 CFR 60-300.44(b):

1. Applicant records are maintained which indicate whether an applicant self-identified as a protected veteran. This information can be retrieved for review by the Department of Labor and the contractor's personnel officials for use in investigations and internal compliance activities.
2. Records are maintained which indicate employees considered for competitive promotions within the organization. Employees are given the opportunity to voluntarily self-identify protected veteran status.
3. Records are maintained regarding training opportunities granted to employees which include whether the employee has self-identified as a protected veteran.
4. Any time a known protected veteran applicant or employee is rejected for employment, promotion, or training, the agency prepares a statement outlining the reason.
5. Requests for accommodation due to a disability are maintained along with the nature of the request and whether the accommodation was granted. If the accommodation was denied, the agency prepares a statement describing the reason for denying the accommodation request. All accommodation records are treated as a confidential medical record in accordance with 41 CFR 60-300.23(d).

## **III. Review of Physical and Mental Job Qualification Standards (41 CFR 60-300.44(c))**

Natchitoches Parish Sheriff's Office reviews the physical and mental job qualification standards of each job opening before it is publicly or internally posted to ensure that, to the extent that such qualification requirements tend to screen out qualified disabled veterans, they are related to the job(s) in question and consistent with business necessity and safe performance of the job. The physical and mental qualifications are also reviewed as new jobs are established or job requirements are modified.

All job qualification requirements were found to be job related and consistent with business necessity and safety. Natchitoches Parish Sheriff's Office will continue to review physical and mental job qualification requirements whenever a job vacancy will be filled through either hiring or promotion and will conduct a qualifications review whenever job duties change.

If Natchitoches Parish Sheriff's Office at any time should inquire into an applicant's physical or mental condition or should conduct a medical examination, such inquiries or exams will be conducted in accordance with the VEVRAA regulations and the information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the VEVRAA regulations. The results of the examination or inquiry will only be used in accordance with the VEVRAA regulations.

## **IV. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-300.44(d))**

Natchitoches Parish Sheriff's Office will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified disabled veterans unless doing so would impose an undue hardship on the operation of its business. The agency also commits to engaging in an interactive process with the person requesting the accommodation (or the person's representative), as needed, to determine an appropriate accommodation.

If an employee who is known to be a qualified disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the manager or appropriate HR personnel will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

In determining the extent of the agency's accommodation obligations, the following factors are considered:

1. Business necessity; and
2. Financial cost and expense.

Natchitoches Parish Sheriff's Office will also ensure that all requests for reasonable accommodation and any medical or disability-related information provided to Natchitoches Parish Sheriff's Office will be treated as confidential medical records and maintained in a separate medical file.

## **V. Anti-Harassment Procedures (41 CFR 60-300.44(e))**

Employees and applicants of Natchitoches Parish Sheriff's Office will not be subject to harassment because of protected veteran status. Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have 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 protected veterans is prohibited. Any employee or applicant who believes that he or she has been subject to retaliation should promptly contact a manager in their chain of command, or promptly contact the Human Resources Director for assistance.

This policy is made available for employees and applicants to view. Furthermore, Natchitoches Parish Sheriff's Office monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

## **VI. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-300.44(f))**

Natchitoches Parish Sheriff's Office undertakes appropriate outreach and positive recruitment efforts to effectively attract protected veterans. In order to comply with the external dissemination of the EEO and Affirmative Action policy, the agency provides written or electronic notification to all current subcontractors, vendors, and suppliers and will continue to do so on an annual basis. The agency will also provide such notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them. Natchitoches Parish Sheriff's Office has informed its recruiting sources, including State employment agencies and local employment service delivery systems, of the agency's policy concerning the employment of qualified protected veterans and will notify them of employment

opportunities as they become available. Natchitoches Parish Sheriff's Office requested all recruiting sources to actively recruit and refer qualified persons for job opportunities. Natchitoches Parish Sheriff's Office will include the equal opportunity clause concerning the employment of qualified protected veterans in all non-exempt subcontracts and purchase orders.

## **VII. Internal Dissemination of Policy (41 CFR 60-300.44(g))**

Natchitoches Parish Sheriff's Office has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified protected veterans. Procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help Natchitoches Parish Sheriff's Office meet this obligation.

The agency realizes that an outreach program is ineffective without the adequate internal support from management personnel and other employees. In order to ensure greater employee cooperation and participation in the agency's affirmative action efforts, Human Resources Director has adopted policies and engaged in activities which are not limited to the following:

1. Copy of our AAP for Protected Veterans is available for inspection to any employee or applicant upon request;
2. EEO Policy Statement and the EEO is the Law poster are placed on bulletin boards located throughout our facilities and work areas;
3. Electronic versions of the EEO Policy Statement and the EEO is the Law poster are clearly labeled and posted on the agency's intranet;
4. Meetings with executive, management, and supervisory personnel are held to explain the intent of the policy and individual responsibility for effective implementation;
5. Managers and supervisors are provided with affirmative action and EEO training upon commencement of their management roles;
6. Policy is discussed during employee orientation;
7. Union officials and/or employee representatives are informed of these policies; and
8. When employees are featured in publications, protected veterans are included when available.

## **VIII. Audit and Reporting Systems (41 CFR 60-300.44(h))**

The Human Resources Director has the responsibility for the preparation and implementation of the AAP. Responsibility for the effective implementation of the AAP is also vested with each department manager and supervisor.

The following activities are reviewed at least annually to ensure freedom from discrimination against, or stereotyping of, protected veterans in any manner. During the self-audit, the following activities are reviewed:

1. Recruitment, advertising, and job application procedures;
2. Implementation of hiring, promotion, upgrading, award of tenure, layoff, and 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. Awarding of sick leave, leaves of absence, or implementation of any other leave policies;
6. Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings and conferences; and
7. Application of any other term, condition, or privilege of employment, including participation in agency-sponsored educational, training, recreational, and social activities.

Natchitoches Parish Sheriff's Office's audit system includes periodic reports provided by the Human Resources Director documenting any efforts to achieve 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.

The following documents are maintained as a component of Natchitoches Parish Sheriff's Office's internal audit process: documentation of self-audit; summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs by job group relating to protected veterans; and an applicant flow

log showing the name, race, ethnicity, sex, disability status, veteran status, date of application, job title, and action taken for all individuals applying for job opportunities.

## **IX. Responsibility for Implementation (41 CFR 60-300.44(i))**

### **A. Responsibilities of Human Resources Director:**

Joe Hamilton, the Human Resources Director, has been designated to direct the activities of the affirmative action program. This person has the responsibility for ensuring the effective implementation of the agency's AAP. These responsibilities include, but are not limited to:

1. Implementing the AAP for 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 Natchitoches Parish Sheriff's Office's affirmative action obligations;
3. Assisting Human Resources department with reviewing the qualifications of all applicants and employees considered/eligible for hiring, promotion, transfer, or layoff/reduction in force to ensure qualified protected veterans are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur;
4. Assisting in the development of solutions for any identified problem areas;
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 management informed of equal opportunity progress and problems within the agency through, at a minimum, periodic reports;
7. Providing department managers with a copy of the AAP for 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 agency's AAP for 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. Assisting in ensuring that career development of employees who are protected veterans is equal to that of other employees;
10. Auditing the contents of agency bulletin boards to ensure that required information is posted and up-to-date;
11. Serving as a liaison between Natchitoches Parish Sheriff's Office and enforcement agencies; and
12. Serving as a liaison between Natchitoches Parish Sheriff's Office and outreach and recruitment sources for protected veterans.

### **B. Responsibilities of Managers and Supervisors:**

Managers and supervisors are advised annually of their responsibilities under the agency's AAP for protected veterans. These responsibilities include, but are not limited to:

1. Reviewing the agency's affirmative action policy for 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. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur; and
3. Reviewing all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

## **X. Training (41 CFR 60-300.44(j))**

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes receive annual training regarding Natchitoches Parish Sheriff's Office's AAP and their role in its implementation. Employees hired or promoted into these roles also receive training on regulatory requirements under Vietnam Era Veterans' Readjustment Assistance Act soon after being hired or placed into these roles.

During the annual training, personnel are advised of their responsibilities under the AAP for protected veterans and of their obligations to:

- Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
- Ensure qualified applicants and employees who are protected veterans are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training, or to receive awards or bonuses;
- Provide reasonable accommodation to the known physical or mental limitations of qualified disabled veterans unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any information regarding self-identification of protected veteran status; and
- Ensure that nondiscrimination is adhered to in all personnel activities.

## **XI. Applicant and Hiring Data (41 CFR 60-300.44(k))**

Natchitoches Parish Sheriff's Office collects employee data pertaining to protected veterans to assess the effectiveness of the agency's outreach and recruitment efforts. We invite applicants to voluntarily inform the agency whether they believe they are protected veterans in compliance with the VEVRAA requirements. This data will be maintained for three years.

## **XII. Hiring Benchmarks (41 CFR 60-300.45)**

Natchitoches Parish Sheriff's Office has adopted the national percentage of veterans in the civilian labor force provided by OFCCP as its hiring benchmark for the AAP year. This benchmark is used as one of the criteria in its assessment of the effectiveness of its outreach and recruitment efforts.



# Natchitoches Parish Sheriff's Office



## AFFIRMATIVE ACTION PROGRAM (AAP)

## FOR SECTION 503 OF THE REHABILITATION ACT

**Plan Effective Date:** July 01, 2020

**Plan Expiration Date:** June 30, 2021

**AAP Administrator:** Joe Hamilton, Human Resources Director

**Approved by:** R. Stuart Wright, Sheriff

**Establishment's Name:** Natchitoches Parish Sheriff's Office

**Establishment's Address:** 200 Church Street, Suite 100 Natchitoches, LA 71457

# Natchitoches Parish Sheriff's Office

## AFFIRMATIVE ACTION PROGRAM for INDIVIDUALS WITH DISABILITIES

### CONFIDENTIAL TRADE SECRET MATERIALS

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### TABLE OF CONTENTS

- I. Equal Employment Opportunity (EEO) Policy Statement (41 CFR 60-741.44(a))
- II. Review of Personnel Processes (41 CFR 60-741.44(b))
- III. Review of Physical and Mental Job Qualification Standards (41 CFR 60-741.44(c))
- IV. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-741.44(d))
- V. Anti-Harassment Procedures (41 CFR 60-741.44(e))
- VI. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-741.44(f))
- VII. Internal Dissemination of Policy (41 CFR 60-741.44(g))

VIII. Audit and Reporting Systems (41 CFR 60-741.44(h))

IX. Responsibility for Implementation (41 CFR 60-741.44(i))

- A. Responsibilities of Human Resources Director
- B. Responsibilities of Managers and Supervisors

X. Training (41 CFR 60-741.44(j))

XI. Applicant and Hiring Data (41 CFR 60-741.44(k))

XII. Utilization Analysis (41 CFR 60-741.45(d))

XIII. Identification of Problem Areas and Action-oriented Programs (41 CFR 60-741.35(e) and (f))

## **I. Equal Employment Opportunity (EEO) Policy Statement (41 CFR 60-741.44(a))**

The EEO Policy Statement on the following page is posted on our agency's bulletin board along with our required employment posters and is viewable by both employees and applicants. The EEO is the Law poster is also posted on our agency's bulletin board as well as made available electronically through our agency website for viewing by online applicants.

### **Natchitoches Parish Sheriff's Office**

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Natchitoches Parish Sheriff's Office prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. Natchitoches Parish Sheriff's Office also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As Sheriff of Natchitoches Parish Sheriff's Office, 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 agency, Joe Hamilton has been assigned Human Resources Director duties for Natchitoches Parish Sheriff's Office. One of the Human Resources Director's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of Natchitoches Parish Sheriff's Office's programs.



In furtherance of Natchitoches Parish Sheriff's Office's policy regarding affirmative action and equal employment opportunity, Natchitoches Parish Sheriff's Office has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that Natchitoches Parish Sheriff's Office is 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 AAP is available for inspection by any employee or applicant for employment upon request between 9:00 am - 4:00 pm at the Human Resources department. Any questions should be directed to [redacted], your supervisor, or Joe Hamilton, Human Resources Director.

  
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R. Stuart Wright

Sheriff

Natchitoches Parish Sheriff's Office

July 01, 2020

## **II. Review of Personnel Processes (41 CFR 60-741.44(b))**

Natchitoches Parish Sheriff's Office complies with the requirement to "periodically review" its personnel processes by reviewing these processes annually to determine whether its present procedures assure careful, thorough, and systematic consideration of the qualifications of known individuals with disabilities. As part of this review, Natchitoches Parish Sheriff's Office also ensures that its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

The following is a set of procedures which may be used to meet the requirements of 41 CFR 60-741.44(b):

1. Applicant records are maintained which indicate whether or not an applicant self-identified as an individual with a disability. This information can be retrieved for review by the Department of Labor and the contractor's personnel officials for use in investigations and internal compliance activities.
2. Records are maintained which indicate employees considered for competitive promotions within the organization. Employees are given the opportunity to voluntarily self-identify disability status.
3. Records are maintained regarding training opportunities granted to employees which include whether or not the employee has self-identified as an individual with a disability.
4. Any time a known applicant or employee with a disability is rejected for employment, promotion, or training, the agency prepares a statement outlining the reason.
5. Requests for accommodation due to a disability are maintained along with the nature of the request and whether or not the accommodation was granted. If the accommodation was denied, the agency prepares a statement describing the reason for denying the accommodation request. All accommodation records are treated as a confidential medical record in accordance with 41 CFR 60-741(d).

## **III. Review of Physical and Mental Job Qualification Standards (41 CFR 60-741.44(c))**

Natchitoches Parish Sheriff's Office reviews the physical and mental job qualification standards of each job opening before it is publicly or internally posted to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. The physical and mental qualifications are also reviewed as new jobs are established or job requirements are modified.

All job qualification requirements were found to be job related and consistent with business necessity and safety. Natchitoches Parish Sheriff's Office will continue to review physical and mental job qualification requirements whenever a job vacancy will be filled through either hiring or promotion and will conduct a qualifications review whenever job duties change.

If Natchitoches Parish Sheriff's Office at any time should inquire into an applicant's physical or mental condition or should conduct a medical examination, such inquiries or exams will be conducted in accordance with the Section 503 regulations and the information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will only be used in accordance with the Section 503 regulations.

## **IV. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-741.44(d))**

Natchitoches Parish Sheriff's Office will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless doing so would impose an undue hardship on the operation of its business. The agency also commits to engaging in an interactive process with the person requesting the accommodation (or the person's representative), as needed, to determine an appropriate accommodation.

If an employee with a known disability has significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the manager or appropriate HR personnel will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

In determining the extent of the agency's accommodation obligations, the following factors are considered:

1. Business necessity; and
2. Financial cost and expense.

Natchitoches Parish Sheriff's Office will also ensure that all requests for reasonable accommodation and any medical or disability-related information provided to Natchitoches Parish Sheriff's Office will be treated as confidential medical records and maintained in a separate medical file.

## **V. Anti-Harassment Procedures (41 CFR 60-741.44(e))**

Employees and applicants of Natchitoches Parish Sheriff's Office will not be subject to harassment because of disability. Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have 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 is prohibited. Any employee or applicant who believes that he or she has been subject to retaliation should promptly contact a manager in their chain of command, or promptly contact the Human Resources Director for assistance.

This policy is made available for employees and applicants to view. Furthermore, Natchitoches Parish Sheriff's Office monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

## **VI. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-741.44(f))**

Natchitoches Parish Sheriff's Office undertakes appropriate outreach and positive recruitment efforts to effectively attract individuals with disabilities. In order to comply with the external dissemination of the EEO and Affirmative Action

policy, the agency provides written or electronic notification to all current subcontractors, vendors, and suppliers and will continue to do so on an annual basis. The agency will also provide such notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them.

Natchitoches Parish Sheriff's Office has informed its recruiting sources, including State employment agencies and local employment service delivery systems, of the agency's policy concerning the employment of qualified individuals with disabilities and will notify them of employment opportunities as they become available. Natchitoches Parish Sheriff's Office requested all recruiting sources to actively recruit and refer qualified persons for job opportunities. Natchitoches Parish Sheriff's Office will include the equal opportunity clause concerning the employment of qualified individuals with disabilities in all non-exempt subcontracts and purchase orders.

## **VII. Internal Dissemination of Policy (41 CFR 60-741.44(g))**

Natchitoches Parish Sheriff's Office has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. Procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help Natchitoches Parish Sheriff's Office meet this obligation.

The agency realizes that an outreach program is ineffective without the adequate internal support from management personnel and other employees. In order to ensure greater employee cooperation and participation in the agency's affirmative action efforts, Natchitoches Parish Sheriff's Office has adopted policies and engaged in activities which are not limited to the following:

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## **VIII. Audit and Reporting Systems (41 CFR 60-741.44(h))**

The Human Resources Director has the responsibility for the preparation and implementation of the AAP. Responsibility for the effective implementation of the AAP is also vested with each department manager and supervisor.

The following activities are reviewed at least annually to ensure freedom from discrimination against, or stereotyping of, individuals with disabilities in any manner. During the self-audit, the following activities are reviewed:

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3. Rates of pay and any other forms of compensation including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Awarding of sick leave, leaves of absence, or implementation of any other leave policies;
6. Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings and conferences; and
7. Application of any other term, condition, or privilege of employment, including participation in agency-sponsored educational, training, recreational, and social activities.

Natchitoches Parish Sheriff's Office's audit system includes periodic reports provided by Human Resources Director documenting Natchitoches Parish Sheriff's Office's efforts to achieve 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.

The following documents are maintained as a component of Natchitoches Parish Sheriff's Office's internal audit process: documentation of self-audit; summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs by job group relating to individuals with disabilities; and an applicant flow log showing the name, race, ethnicity, sex, disability status, veteran status, date of application, job title and action taken for all individuals applying for job opportunities.

## **IX. Responsibility for Implementation (41 CFR 60-741.44(i))**

### **A. Responsibilities of Human Resources Director**

Joe Hamilton, the Human Resources Director, has been designated to direct the activities of the affirmative action program. This person has the responsibility for ensuring the effective implementation of the agency's AAP. These responsibilities include, but are not limited to:

1. Implementing the AAP for individuals with disabilities, 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 Natchitoches Parish Sheriff's Office's affirmative action obligations;
3. Assisting Human Resources department with reviewing the qualifications of all applicants and employees considered/eligible for hiring, promotion, transfer, or layoff/reduction in force to ensure qualified individuals with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur;
4. Assisting in the development of solutions for any identified problem areas;
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 management informed of equal opportunity progress and problems within the agency through, at a minimum, periodic reports;
7. Providing department managers with a copy of the AAP for individuals with disabilities and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the agency's AAP for individuals with disabilities with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Assisting in ensuring that career development of employees who are individuals with disabilities is equal to that of other employees;
10. Auditing the contents of agency bulletin boards to ensure that required information is posted and up-to-date;
11. Serving as a liaison between Natchitoches Parish Sheriff's Office and enforcement agencies; and
12. Serving as a liaison between Natchitoches Parish Sheriff's Office and outreach and recruitment sources for individuals with disabilities.

### **B. Responsibilities of Managers and Supervisors**

Managers and supervisors are advised annually of their responsibilities under the agency's AAP for individuals with disabilities. These responsibilities include, but are not limited to:

1. Reviewing the agency's affirmative action policy for individuals with disabilities 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. Reviewing the qualifications of all applicants and employees to ensure individuals with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur; and
3. Reviewing all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

## **X. Training (41 CFR 60-741.44(j))**

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes receive annual training regarding Natchitoches Parish Sheriff's Office's AAP and their role in its implementation. Employees hired or promoted into these roles also receive training on regulatory requirements under Section 503 of the Rehabilitation Act soon after being hired or placed into these roles.

During the annual training, personnel are advised of their responsibilities under the AAP for individuals with disabilities of their obligations to:

- Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
- Ensure qualified applicants and employees who are individuals with disabilities are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training, or to receive awards or bonuses;
- Provide reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any information regarding self-identification of individuals with disabilities; and
- Ensure that nondiscrimination is adhered to in all personnel activities.

## **XI. Applicant and Hiring Data (41 CFR 60-741.44(k))**

Natchitoches Parish Sheriff's Office collects employee data pertaining to individuals with disabilities to assess the effectiveness of the agency's outreach and recruitment efforts. We invite applicants to voluntarily inform the agency whether they believe they are individuals with disabilities in compliance with the Section 503 requirements. This data will be maintained for three years.

## **XII. Utilization Analysis (41 CFR 60-741.45(d))**

The utilization analysis is designed to evaluate the representation of individuals with disabilities in each job group within the contractor's workforce with the 7 percent utilization goal established by the OFCCP. The utilization goal is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. Quotas are expressly forbidden.

## **XIII. Identification of Problem Areas and Action-oriented Programs (41 CFR 60-741.45(e) and (f))**

When the percentage of individuals with disabilities in one or more job groups is less than the utilization goal, the agency takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, we assess personnel processes, the effectiveness of the outreach and recruitment efforts, the results of our affirmative action program audit, and any other areas that might affect the success of the affirmative action program.

The agency develops and executes action-oriented programs designed to correct any identified problems areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts, and/or other actions designed to correct the identified problem areas and attain the established goal.

# Natchitoches Parish Sheriff's Office



## EXECUTIVE ORDER 11246

## AFFIRMATIVE ACTION PROGRAM

**Plan Effective Date:** July 01, 2020

**Plan Expiration Date:** June 30, 2021

**AAP Administrator:** Joe Hamilton, Human Resources Director

**Approved by:** R. Stuart Wright, Sheriff

**Establishment's Name:** Natchitoches Parish Sheriff's Office

**Establishment's Address:** 200 Church Street, Suite 100 Natchitoches, LA 71457

# Natchitoches Parish Sheriff's Office

## AFFIRMATIVE ACTION PROGRAM for EXECUTIVE ORDER 11246

### CONFIDENTIAL TRADE SECRET MATERIALS

The material set forth in the AAP is deemed to constitute trade secrets, operations information, confidential statistical data, and other confidential commercial and financial data, within the meaning of the Freedom of Information Act, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

### TABLE OF CONTENTS

- I. Equal Employment Opportunity (EEO) Policy Statement
- II. Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a))
  - A. Designation of Responsibilities of Human Resources Director (41 CFR 60-2.17(a))
  - B. Responsibilities of Natchitoches Parish Sheriff's Office's Management to Ensure Implementation of the AAP (41 CFR 60-2.17(a))
- III. Identification of Problem Areas (41 CFR 60-2.17(b))
- IV. Accomplishment of Prior Year Placement Goals



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

VI. Internal Audit and Reporting Systems (41 CFR 2.17(d))

## **I. Equal Employment Opportunity (EEO) Policy Statement**

The EEO Policy Statement on the following page is posted on our agency's bulletin board along with our required employment posters and is viewable by both employees and applicants. The EEO is the Law poster is also posted on our agency's bulletin board as well as made available electronically through our agency website for viewing by online applicants.

### **Natchitoches Parish Sheriff's Office**

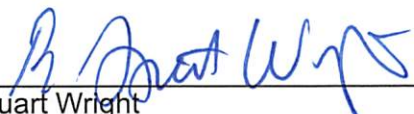
## **EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT**

It is the policy of Natchitoches Parish Sheriff's Office not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, national origin, or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereafter referred collectively as "protected veterans." It is also the policy of Natchitoches Parish Sheriff's Office 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, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the agency will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

Natchitoches Parish Sheriff's Office prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. Natchitoches Parish Sheriff's Office also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As Sheriff of Natchitoches Parish Sheriff's Office, 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 agency, Joe Hamilton has been assigned Human Resources Director duties for Natchitoches Parish Sheriff's Office. One of the Human Resources Director's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of Natchitoches Parish Sheriff's Office's programs.

In furtherance of Natchitoches Parish Sheriff's Office's policy regarding affirmative action and equal employment opportunity, Natchitoches Parish Sheriff's Office has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that Natchitoches Parish Sheriff's Office is 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 AAP is available for inspection by any employee or applicant for employment upon request between 9:00 am - 4:00 pm at the Human Resources department. Any questions should be directed to me, your supervisor, or Joe Hamilton, Human Resources Director.

  
R. Stuart Wright

July 01, 2020

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

### **A. Designation of Responsibilities of Human Resources Director (41 CFR 60-2.17(a))**

Joe Hamilton, 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 agency. 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:
  - Measures the effectiveness of the Affirmative Action Program;
  - Determines the degree to which AAP goals and objectives are met; and
  - Identifies the need for remedial action.
5. Keeping agency's management informed of equal opportunity progress and reporting potential problem areas within the agency through reports;
6. Reviewing the agency'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 agency's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between Natchitoches Parish Sheriff's Office and enforcement agencies.

### **B. Responsibilities of Natchitoches Parish Sheriff's Office'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 agency'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.

## **III. Identification of Problem Areas (41 CFR 60-2.17(b))**

Natchitoches Parish Sheriff's Office 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 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 and/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 minorities and/or females 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/or female students;
  - Publishing job advertisements in newspapers and/or magazines that target minorities and/or females;
  - Offering mentorship programs for minority and/or female employees;
  - Offering job training to minorities and/or females currently employed by the agency 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 minorities and/or females; and
  - Continuing to use the services of the respective Employment Service Delivery System.
2. **Review of Employment Decisions:** A review of employment decisions is made to determine whether minorities and/or females are selected at a less favorable rate than non-minorities and/or males. A review of non-minorities and/or males is also conducted to determine if either group is being selected at a statistically significant lessor rate than minorities and/or females.
3. **Review of Hires/Promotions:** Whenever minorities and/or females are selected at a lower rate than non-minorities and/or males, a review of the applicant flow is conducted to determine possible reasons why minorities and/or females were not selected at a more favorable rate. If the agency is attracting fewer than expected minorities and/or females 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 minorities and/or females. If non-minorities and/or males are selected at a statistically significantly lessor rate than minorities and/or females, 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 minorities and/or females are being involuntarily terminated or are voluntarily leaving at a higher rate than non-minorities and/or males, a review of the employee files will be made to ensure the agency is applying its policies and procedures for termination equally for protected as well as non-protected classes. If non-minorities and/or males have a statistically significant higher rate of termination than minorities and/or females, an investigation will also be conducted to determine the cause.
5. **Compensation:** Compensation is reviewed at least annually 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, Natchitoches Parish Sheriff's Office will put a plan in place to bring pay into greater alignment.

**Job Group: C - MID-LEVEL Supervisor**

**Class      Goal      Placement Rate %**

Female                      27.12%

## **IV. Accomplishment of Prior Year Placement Goals**

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

There were no areas of underutilization in the prior year's Affirmative Action Program. Therefore, no placement goals were set.

## **V. 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:
  - Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
  - Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
  - Training personnel and management staff on proper interview and selection procedures; and
  - 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/or female applicants, undertakes the following actions:
  - Including the phrase "As an EEO/Affirmative Action Employer all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status" or other acceptable tagline in all printed employment advertisements;
  - Placing employment advertisements in local minority news media and women's interest media;
  - Disseminating information on job opportunities to organizations representing minorities and women and to employment development agencies when job opportunities become available;
  - Encouraging all employees to refer qualified applicants;
  - Actively recruiting at secondary schools, junior colleges, colleges and universities with predominantly minority and/or female enrollments; and
  - Requesting employment agencies to refer qualified minorities and women.
5. Reviewing agency's compensation practices;
6. Ensuring that all employees are given equal opportunity for promotions and/or transfers. This is achieved by:
  - Posting opportunities internally;
  - Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
  - Evaluating job requirements to ensure that they are appropriate.

## **VI. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))**

The agency 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. Natchitoches Parish Sheriff's Office'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, age, sex, sexual orientation, gender identity, pregnancy, genetic information, disability, veteran status, or any other legally protected status covered by applicable state or local law:

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 Natchitoches Parish Sheriff's Office's internal audit process:

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

Natchitoches Parish Sheriff's Office'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 Human Resources Director. During the reporting cycle, the following occurs:

1. The Human Resources Director will discuss any problems relating to substantial disparate impact, EEO charges, etc., with management; and
2. The Human Resources Director will report the status of the agency's AAP goals and objectives to management. The Human Resources Director will recommend remedial actions for the effective implementation of the AAP.