Community Action Development Corporation

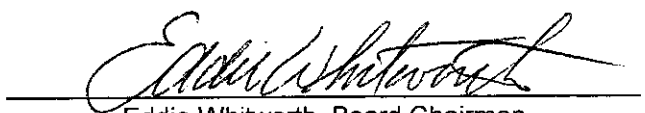
AFFIRMATIVE ACTION PLAN

Revised 2023

Rob Meador, Equal Employment Opportunity Officer

Approved by the Board of Directors

6/5/2023



Eddie Whitworth, Board Chairman

COMMUNITY ACTION DEVELOPMENT CORPORATION

AFFIRMATIVE ACTION PLAN

Revised May 2023

STATEMENT OF BASIC GRANTEE POLICY

It is the policy of this agency that no applicant, client, and/or employee shall, on the basis of race, color, physical impairment, sex, age, religion, national origin, political affiliation, or belief, or any other non-merit factor, be excluded from participation in or be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which Community Action Development Corporation (CADC), operates or is applying to for funds.

It is the policy of Community Action Development Corporation to promote the full realization of equal employment opportunity and the fair and equitable program participation by all eligible groups in the community; to implement affirmative action to change discriminatory institutional polices, practices and attitudes within the community; and to promote equal employment opportunity through the effective use of Agency purchasing power.

A self-assessment has been carried out within the Affirmative Action Plan on Agency performance in each of the four major action areas. The results of the self-assessment are the plans and goals, which are herein, implemented to promote positive equal opportunity.

A EEO Officer, Rob Meador has been appointed by the Executive Director and is responsible to the Executive Director to perform the duties as outlined in his/her job description; and under the supervision of the Executive Director to implement the Affirmative Action Plan of Community Action Development Corporation.

The Executive Committee has been appointed by the Board of Directors to serve as the Affirmative Action Committee. This committee is constituted in such a manner as to insure adequate representation from all sectors and eligible groups (Exhibit A, Roster of Executive Committee). This committee will exercise the following functions:

1) To establish and oversee the process which develops and evaluates the Affirmative Action Plan;
2) To systematically monitor and report to the Board Concerning grantee progress in meeting its Affirmative Action Goals and Timetables;

3) To make policy recommendations to the Board concerning all aspects of human rights (internal and external);
4) To hear complaints of discrimination in accordance with established and internal grievance procedures as stated in the Personnel Policies and Affirmative Action Plan of the Agency.

The Affirmative Action Program, herein installed in all phases and levels of programs and activities, provides a plan whereby equal opportunities for participation and employment, with provisions for periodic self-evaluation, may be achieved.

A. Affirmative Action to Insure Equal Opportunity for Participation in all Phases and Levels of Grantee Programs and Activities;

It will be the policy of CADC to insure fair participation to all racial and ethnic groups represented in the geographic area served by CADC. It shall be the policy of this Agency to solicit this participation in all phases of the program, including the planning of programs, policymaking, program staffing, agency evaluation, and program participation. Members of all ethnic groups within the area will be drawn into participation in all services offered by the Agency. The following activities will be emphasized in obtaining the involvement of members of ethnic groups in CADC programs.

1) Active Information and Outreach Program: Staff members will survey participants in each county to develop the Community Action and Strategic Plan.
2) Inclusion of all ethnic groups in policy making groups, governing boards, and advisory committees. (Exhibit B, Ethnic Representation of CADC Board and Committees)
3) The Executive Office and each of the County Offices are in a district of their respective towns where they are easily accessible to all ethnic groups.
4) Regular Board meetings: Regular board meeting serve a dual purpose: to serve as informative meetings to the sectors of the community they represent (public agencies, private business, and low-income); and to conduct agency business.

The Client Characteristics Report (Exhibit C) indicates a balance of ethnic groups in the total program. The Agency Policy has been to provide programs to fit the needs and problems of each sector of the poverty population and to attain an equitable balance of all eligible persons. The participation of all eligible groups, including women, in program planning, development and evaluation is insured under the Agency By-Laws.
Each county provides an equal representation on the Board of Directors from public agency, private interest groups and low-income neighborhood groups. (Exhibit B, Analysis of Ethnic Representation of CADC Board and Committees and Analysis of Male and Female Representation of Board and Board Committees).

The location of Head Start Centers provides full and equal access to programs for members of all eligible groups. The Executive and County offices are also accessible to all eligible groups (Exhibit D).

Assignment of staff is made to effectively utilize their experience and capabilities, taking into consideration such factors as culture and ethnic background.

B. Affirmative Equal Employment Opportunity Practices and Procedures:

CADC does not discriminate because of race, color, disability, sex, age, religion, national origin, political affiliation, or belief, or any other non-merit factor in its procedures of employment, such as upgrading, demotion, transfer, recruitment, lay-off, termination, rates of pay or other compensation, selection of training, or any other benefit. Recruitment of personnel will be designed to provide the maximum employment opportunity for area residents and groups served, including persons over 66 years of age (See "Analysis of Ethnic Composition of CADC Staff by Grade," Exhibit E)

Community Action Development Corporation states in its By-Laws that it is an equal opportunity employer. All job openings are advertised through one or more sources, including but not limited to local media outlets, internet, and agency web-site.

Job qualifications will be updated periodically to ensure qualifications are realistic. Job qualifications will be waived for applicants who may be developed through training, if time and the position permit such a waiver.

Transfers from one location to another or one position to another will be made in the best interest of CADC, the individual and the community.

Management training has been and will be provided for the staff in an effort to promote program goals and to provide a more effective staff. Employees are given opportunities to travel to area, regional and state meetings whenever those meetings can benefit the employees to better perform their jobs.

In-service training will be provided by CADC to provide staff with the skills, training, and experience necessary to enable job progression. Attendance to meetings is recognized as an important means for staff development. Within budget limitations, expenses may be paid by CADC for such meetings.

Attendance at formal educational institutions, where such contributes to increased job capability, may be arranged by an employee at his expense during regular working hours, provided that the time off from work does not exceed 10 hours per week and is covered by either earned compensatory time or leave without pay. Center level Head Start employees may pursue staff development through CDA credentials and other training through a separate plan for employees of the Head Start program. The Agency also has a staff development program, which provides financial assistance to employees for education and training that enhances job capability.

The responsibility at the Agency level is to provide qualified supervision to employees. All personnel are given job description and training for the position, including supervision by trained staff. All state, regional and federal publications, which apply to a given job, is given to the supervisor and is, in turn, passed down to the employees. It is the responsibility of the supervisor to clarify, explain and assemble the materials in such a manner that the new employee will have a better understanding of his/her job. Personnel Policies provide that each supervisor perform a yearly appraisal of the people over whom he/she is given supervisory responsibility. This evaluation will bring to the attention of the employee his/her status, his/her rate of improvement and areas where more improvement is needed. This evaluation becomes an important part of the Agency's personnel records. Any recommendations when there are openings for new employment should come after a thorough investigation of the employee's work records.

It is a policy of CADC to bring employee complaints and grievances into the open for frank discussion. The employee will have the right to present their grievances for prompt consideration and fair determination. The employee may present his/her case himself/herself or he/she may have a representative of his/her own choosing present it for him/her.

In the filing of a grievance, either oral or written and whether by the employee or his/her representative, the person so filing will be free from restraint, coercion, discrimination or reprisal.

1. *Step1*
   An aggrieved employee will first discuss the matter with his/her immediate supervisor. It is thought that most grievances can be resolved at this point through a better mutual understanding. This must be done not later than ten (10) days after the occurrence of the incident or action causing the grievance.

2. *Step 2*
   If Step 1 does not resolve the grievance, the aggrieved employee must submit his/her grievance in writing within five (5) days to the EEO Officer. The EEO Officer will respond with a decision within five (5) days.

3. *Step 3*
   If the employee is not satisfied with the decision reached in Step 2, he/she may request the EEO Officer to submit all the evidence in the case through the Executive Director to the Executive Committee of the Board for review and judgment within five (5) days. The employee, or a representative of the employee, may appear before the committee to present his/her case. The employee's supervisor has the same right.

   In addition, the Executive Committee may call for the testimony of other Agency personnel. The Executive Committee must act on the case within thirty (30) days following submission of the grievance documentation. The decision of the Executive Committee will be ratified by the full board at the next meeting and is final

C. Discrimination Complaint Procedure

The EEO Officer shall work with the Executive Director, the Executive Committee and the Board of Directors throughout the process to insure a prompt, fair and impartial processing of formal and informal complaints of discrimination.

The EEO Officer shall be responsible for Agency publicity to ensure that all employees and applicants are knowledgeable concerning the grantee's Equal Employment Opportunity Program. This is assured through the orientation and distribution of the Affirmative Action plan to all employees.

Any person (employee, program participant, eligible non-participant, and applicant for employment) who feels hat he/she has been denied an equal opportunity for employment or excluded from participating in or enjoying the benefits of the grantees programs, or representation in or on the grantee programs because of race, creed, color, national origin, religion, sex, age, handicap, political affiliation or beliefs, may file a complaint.

The EEO Officer will have the following authority:
1. Receive and attempt to resolve complaints of discrimination;

2. Advise complainant of rights;
3. Provide complainant with grievance procedures and deadlines for filing complaints;
4. Advise complainant of his/her right to be accompanied, represented or advised by a representative or attorney.

D. Client Appeal Procedures

If an applicant for any service provided by Community Action Development Corporation (CADC) feels that he/she has been unjustly denied services or discriminated against under Title VI of the Civil Rights Act of 1964 the aggrieved party may appeal that decision by following the procedures below.

1. Within ten days of the denial of services, provide to the Executive Director in writing a formal notice of appeal and the general rationale for entering the appeal process.
2. Upon proper notice of appeal, the Executive Director shall notify the appellate within ten days in writing acknowledging receipt of appeal and providing notification as to date of hearing which will be no longer than 30 days from receipt of appeal. The applicant and/or his/her representative shall be asked to attend the hearing along with the Executive Director, Agency legal counsel, a CADC Board Member from the county in which the aggrieved resides, the Program Director (or other appropriate staff directly supervising the program service in question), and the Agency EEO Officer.
3. The aggrieved applicant shall have access to records and regulations relevant to the appeal process and the right to private and confidential interviews pertaining to the case.
4. Upon hearing the evidence pertaining to the case, the Appeals Committee will make their determination and provide a written notification of the decision to the aggrieved applicant within 10 days of the hearing.
5. Should the decision to deny services be upheld, the applicant and/or his/her representative has the right to present their case to the CADC Board of Directors at the next regularly scheduled Board Meeting. The aggrieved applicant should notify the Executive Director in writing of their request to a hearing before the full board at least 10 working days prior to the next regularly scheduled board meeting so that the issue can be included on the agenda. After reviewing the Appeals Committee's decision and hearing the aggrieved applicant, the entire Board shall vote on the issue and render a final determination.

6. For ODOC Programs Only: After all local appeal procedures have been exhausted, an applicant may appeal the contractor's decision to the Oklahoma Department of Commerce – Community Development – Citizen Empowerment/Community Development Division. In such cases, the contractor and appellate shall provide ODOC/Community Development-Citizen Empowerment/Community Development Division with all relevant documentation.
7. It is the policy of CADC that no one be denied assistance on the basis of race, color, gender, creed, religion, age, political affiliation, gender orientation, familial status, or disability.

E. Dissemination of Plan

1. Internal – Agency staff will be made aware of the Affirmative Action Plan at the time of new employee orientation, newsletters, and training sessions.
2. External – The availability of access to the Affirmative Action Plan will be posted on the Agency web – Site, annual report, and notices of employment opportunities.

F. Affirmative Action to Promote Equal Employment Opportunity Through to Effective Use of Grantee Purchasing Power:

CADC has a basic policy of purchasing goods and services preferably from vendors, contractors and suppliers who are in compliance with federal, state and local laws and regulations governing equal employment opportunity practices. Although the Agency must take bids on many items, CADC does, when possible, trade with Disadvantaged Business Enterprises (DBEs) and Women Business Enterprises (WBEs).

G. Affirmative Action Goals

The Affirmative Action Committee has set the following goals:

1. To offer training in the group process for board members to enable them to do group problem solving and to know the powers of the governing board; annually.
2. Continue efforts to employ persons with special emphasis on equitable ethnic composition of staff to poverty population; monthly or when positions are available.
3. To gain feedback from program participants through surveys and customer satisfaction data.

ANALYSIS of ETHNIC REPRESENTATION on CADC BOARDS AND COMMITTEES

Programs	Total Participation	Anglo #	Anglo %	Black #	Black %	Am. Indian #	Am. Indian %	Hispanic #	Hispanic %	Other #	Other %
Boards of Directors	19										
Executive Committee/											
Fical Committee	5	4	80%	0	0%	1	20%	0	0%	0	0%
Roger Mills County	2	2	100%	0	0%	0	0%	0	0%	0	0%
Cotton County	3	2	67%	0	0%	1	33%	0	0%	0	0%
Jefferson County	2	2	100%	0	0%	0	0%	0	0%	0	0%
Kiowa County	3	3	100%	0	0%	0	0%	0	0%	0	0%
Washita County	3	3	100%	0	0%	0	0%	0	0%	0	0%
Tillman County	3	2	67%	0	0%	0	0%	1	33%	0	0%
Beckham County	3	3	100%	0	0%	0	0%	0	0%	0	0%
Head Start Policy Council	24	14	59%	3	13%	3	13%	4	15%	0	0%

ANALYSIS of MALE and FEMALE REPRESENTATION on BOARD AND BOARD COMMITTEES

Programs	Total Participation	Male #	Male %	Female #	Female %
Board of Directors	19	14	61%	5	39%
Executive Committee/					
Personnel Committee	6	5	84%	1	16%
Head Start Pollicy Council	24	3	13%	21	87%

EXHIBIT B

ANALYSIS of ETHNIC REPRESENTATION on CADC BOARDS AND COMMITTEES

Programs	Total Participation	Anglo #	Anglo %	Black #	Black %	Am. Indian #	Am. Indian %	Hispanic #	Hispanic %	Other #	Other %
Boards of Directors	19										
Executive Committee/											
Fical Committee	5	4	80%	0	0%	1	20%	0	0%	0	0%
Roger Mills County	2	2	100%	0	0%	0	0%	0	0%	0	0%
Cotton County	3	2	67%	0	0%	1	33%	0	0%	0	0%
Jefferson County	2	2	100%	0	0%	0	0%	0	0%	0	0%
Kiowa County	3	3	100%	0	0%	0	0%	0	0%	0	0%
Washita County	3	3	100%	0	0%	0	0%	0	0%	0	0%
Tillman County	3	2	67%	0	0%	0	0%	1	33%	0	0%
Beckham County	3	3	100%	0	0%	0	0%	0	0%	0	0%
Head Start Policy Council	24	14	59%	3	13%	3	13%	4	15%	0	0%

ANALYSIS of MALE and FEMALE REPRESENTATION on BOARD AND BOARD COMMITTEES

Programs	Total Participation	Male #	Male %	Female #	Female %
Board of Directors	19	14	61%	5	39%
Executive Committee/					
Personnel Committee	6	5	84%	1	16%
Head Start Pollicy Council	24	3	13%	21	87%

EXHIBIT B

ANALYSIS of ETHNIC PARTICIPATION IN CADC PROGRAMS FY '2022

Ethnic Group	# Participants	% of Total
Black/Not Hispanic	1039	4%
White/Not Hispanic	23104	74%
Hispanic Origin	4555	15%
Native American/Alaskan	1414	4%
Asian/Pacific Islander	103	1%
Other	1067	2%
Total	31282	**100%**

EXHIBIT C

ANALYSIS OF ETHNIC COMPOSTION OF CADC STAFF BY GRADE

	#	#	%	#	%	#	%	#	%	#	%
GRADE	STAFF	Black	Black	Caucasian	Caucasian	Hispanic	Hispanic	Native American	Native American	Asian	Asian
IX	1		0%	1	100%		0%		0%		0%
VIII	0		0%		0%		0%		0%		0%
VII	1		0%	1	100%		0%		0%		0%
VI	0		0%		0%		0%		0%		0%
V	8	1	13%	6	74%	1	13%		0%		0%
IV	3		0%	1	33%	2	67%		0%		0%
III	10	1	10%	6	60%	1	10%	2	20%		0%
II	0		0%		3%		0%		0%		0%
I	49		0%	42	85%	5	11%	2	4%	1	0%
0	3		0%	3	100%		1%		0%		0%
Head Start	90	5	6%	70	78%	14	16%	1	0%		0%
Nutrition	22		0%	22	100%		0%		0%		0%
Totals	187	7	4%	151	81%	23	13%	5	2%	1	0%

ANALYSIS OF STAFF BY SEX

	#	#	%	#	%
GRADE	Staff	Male	Male	Female	Female
IX	1	1	100%	0	0%
VIII	0	0	0%	0	0%
VII	1	1	100%	0	0%
VI	0	0	0%	0	0%
V	8	3	38%	5	62%
IV	3	2	67%	1	33%
III	10	7	70%	3	30%
II	0	0	0%	0	0%
I	49	20	41%	29	59%
0	3	0	0%	3	100%
Head Start	90	1	1%	89	99%
Nutrition	22	2	9%	20	91%
Totals	187	37	20%	150	80%

EXHIBIT E