

City of Appleton

Affirmative Action Plan 2021-22

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I. WHY AN AFFIRMATIVE ACTION PLAN?

Government contractors have required Affirmative Action plans for more than 30 years. Under Public Law 88-352, Title VII of the Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972, all State and local governments that have 15 or more employees are required to keep records and to make such reports to the Equal Employment Opportunity Commission as are specified in the regulation of the commission. State and Local Government Report EEO-4 is being utilized by Federal government agencies that have responsibilities with respect to equal employment opportunity. The Wisconsin Fair Employment Act prohibits employers with one or more employees from discriminating on the basis of age, race, creed, color, disability, marital status, sex, national origin, ancestry, sexual orientation, arrest record or conviction record, membership in the armed forces, or the use or nonuse of lawful products away from the workplace during nonworking hours (WI Stat. Sec. 111.31). The Act specifically states that it does not require an employer to adopt an affirmative action plan to correct an imbalance in the workforce.

II. PURPOSE

The purpose of affirmative action plans is covered in the Office of Federal Contract Compliance Program (OFCCP) at 41 CFR 60-2.10:

An affirmative action program is a set of specific and results-orientated Procedures that a contractor commits itself to apply every good-faith effort.

The objective of those procedures plus such efforts is equal employment opportunity. Procedures without effort to make them work are meaningless, and effort, undirected by specific and meaningful procedures, is inadequate.

An acceptable affirmative action program must include an analysis of areas within which the contractor is deficient in the utilization of minority groups and women and, further, goals and timetables to which the contractor's good-faith efforts must be directed to correct the deficiencies and thus to achieve prompt and full utilization of minorities and women at all levels and in all segments of its workforce where deficiencies exist.

III. HISTORY

Employment discrimination takes place when something adverse happens to an applicant or employee because of his or her race, sex, color, religion, national origin, disability, age, or veteran status in addition to those areas covered by Wisconsin Title VII.

The major laws going back more than 150 years that have affected today's employment picture and affirmative action requirements are:

Race – 1866 and 1871

The first legal requirement for equality among races in the United States was the Civil Rights Act of 1866, an aftermath of the Civil War. This law gave all people the same rights to make contracts and hold property. The law prohibited the states from passing any laws or using any procedures that denied anyone all the rights and privileges to which the Constitution and U.S. citizenship entitled them.

Discrimination – 1964 Civil Rights Act

The 1964 Civil Rights Act prohibits discrimination based on race, color, creed, religion, gender and national origin. The Age Discrimination in Employment Act (ADEA), and the 1972 Equal Employment Act, which created the Equal Employment Opportunity Commission (EEOC), followed it.

Executive Order 11246, signed by President Johnson in 1965, required affirmative action in federal employment and by federal contractors. The order is enforced by the Office of Federal Contract Compliance Programs of the U.S. Department of Labor (OFCCP).

National Origin

The term national origin applies to a person's country of origin or ancestor's country of origin, cultural, or linguistic characteristics. National origin discrimination can also involve such consideration as marriage to a person with a different country or origin, membership or an origination of people with different national origins, or attendance at churches or temples. National Origin is particularly important in the recruitment and selection process. Considerations of race color, creed, or national origin can overflow into areas such as race-related appearance, garnishments, conviction records, and language use on the job, verbal expression and basic educational requirements.

Sex

Title VII of the Civil Rights Act of 1964 (later amended under the Equal Opportunity Act of 1972) included sex as a "protected class." The EEOC enforces Title VII.

Equal Pay

The Equal Pay Act of 1963 requires equal pay for workers of both sexes who perform jobs that require equal skill, effort, and responsibility. It permits wage differentials under bona fide seniority systems or merit review systems.

Age

The age Discrimination in Employment Act of 1967 (ADEA), amended in 1987 and again in 1984, prohibits private employers of 20 or more people from discriminating against employees over age 40 in any way because of age. The Act covers everyone age 40 and over.

Disability

The federal Rehabilitation Act of 1973 prohibits employment practices that discriminate on the basis of disability. The federal Americans with Disabilities Act (ADA) prohibits discrimination in employment based on disability.

Veterans

In 1974 The Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) was enacted, providing the federal contractors take affirmative action for the employment of disabled veterans and Vietnam-era veterans. This law also covers veterans who served on a campaign or expedition for which a campaign badge has been authorized, in addition to special disabled veterans and Vietnam-era veterans.

Pregnancy

An amendment to the Civil Rights Act of 1964 requires employers to treat pregnancy and related disabilities the same as any other disability under the employer's leave of absence policy and medical coverage plans.

Protected Classes

Under federal law the following are considered to be "protected classes":

- **Race** – Black, Hispanic, Asian/Pacific Islander, or American Indian.
- **Religion** – all aspects of religious observance and practice, as well as belief.
- **Sex** – female (including the sexual harassment of women or of males and same-sex harassment). The term "sex" also includes pregnancy, childbirth, and related medical conditions.
- **Age** – over age 40.
- **National origin** – country of one's ancestry.
- **Disabled individual** – both the Rehabilitation Act and American with Disabilities Act (ADA) consider an individual to be disabled if he or she has a physical or mental impairment that substantially

limits one or more major life activities, has a record of such an impairment, or is regarded by others as having such an impairment. The EEOC interprets “impairment” to include any physiological disorder or condition, cosmetic disfigurement, anatomical loss, or any mental or physiological disorder.

- **Individual with disability** – the ADA uses the same definitions as the Rehabilitation Act of 1973.
- **Veterans** – Veterans covered under the current law now include special disabled veterans, veterans of the Vietnam era, and an expanded definition which includes veterans of the World War II, Korea, the Persian Gulf War, Somalia and Bosnia.
- **Genetics** – The Genetics Information Nondiscrimination Act (GINA) of 2008 prohibits employers from discriminating on the basis of information derived from genetic tests.
- **Additional protected classes in Wisconsin** – Arrest/conviction record, marital status, sexual orientation, military service, use or nonuse of lawful products.

Affirmative action is more than nondiscrimination, more than a poster on the bulletin board, or a line about nondiscrimination practices in the organization’s “Help Wanted” advertisements. Nondiscrimination requires that all discriminatory conditions, whether purposeful or inadvertent, be eliminated. Affirmative action means positive efforts to recruit, employ, train, and promote workers who traditionally have been discriminated against in the job market.

Affirmative action is not preferential treatment, nor does it mean that unqualified persons should be hired or promoted over other people. It means that positive steps must be taken to provide equal opportunity for those who have been discriminated against in the past and who may continue to suffer the effects of that discrimination

Affirmative action may be required when it is clear that there is “underutilization” in one or more jobs. Under-utilization is defined as having fewer minorities and women in a particular category than would reasonably be expected, based on their availability. The starting point is identification of some discriminatory effect on that applicant or employee as to pay, benefits, or status within the organization. Affirmative Action should be viewed as the *tool*; and Equal Employment Opportunity (EEO) should be viewed as the ultimate *goal*.

IV. AFFIRMATIVE ACTION TODAY

Affirmative action is firmly entrenched in the United States' organizational structure and culture. The idea of separate male and female jobs has virtually disappeared. Opportunities for women and minorities to be employed and to advance in our society are greater than ever before. Women and minorities have broken into the top echelons of American business and education. Business and education organizations have found that equal employment opportunity is the sound management of human resources. Supervisors and managers are now accustomed to an atmosphere of affirmative action and are advancing employees on the basis of their abilities, regardless of their gender, race, or physical appearance. For many businesses and organizations affirmative action just makes sense. Having an organization with sound practices while maintaining consistency can go a long way in securing a stable workforce.

V. CITY OF APPLETON NONDISCRIMINATION POLICIES

Affirmative Action

The City of Appleton Affirmative Action Policy includes the following policy statement:

It is the official policy of the City of Appleton to provide equal employment opportunities for all qualified and qualifiable persons without regard to race, color, creed, religion, national origin, ancestry, age, sex/gender, handicap or disability, arrest/conviction record, marital status, sexual orientation, gender identity and gender expression, political affiliation, results of genetic testing, honesty testing, pregnancy childbirth or related condition, military service, disabled veteran or covered veteran status, service in the U.S. Armed Forces, the State Defense force, National Guard of any state, or any other reserve component of the United States or State military forces, use or nonuse of lawful products off the employer's premises during non-working hours, or any other non-merit factors, except where such factors constitute a bona fide occupational qualification or substantially relate to the circumstances of a particular job or licensed activity, and with proper regard for privacy and constitutional rights as citizens. This equal employment opportunity is applicable to all phases of employment including job assignment, job restructuring, reasonable accommodation for disabled individuals, recruitment, selection, promotion, transfer, compensation, lay-off, re-call, training and development, corrective action, demotion, termination, leave or benefits, licensing or union membership, and all other components of the City of Appleton Human Resources system.

Harassment and Discrimination

The City of Appleton's Harassment and Discrimination Policy includes the following policy statement:

It is the policy of the City of Appleton that all employees have the right to work in an environment free of all forms of harassment. The City of Appleton will not tolerate, condone, or allow harassment by any employees or other non-employees who conduct business with the City. The City of Appleton considers harassment and discrimination of others forms to be serious employee misconduct. Therefore, the City will take direct and immediate action to prevent such behavior, and to remedy all reported instances of harassment and discrimination. A violation of this City policy can lead to discipline up to and including termination, with repeated violations, even if "minor," resulting in greater levels of discipline as appropriate.

VI. RESPONSIBILITY FOR IMPLEMENTATION

The City of Appleton recognizes that an Affirmative Action Plan requires a commitment and cooperation from all levels of City management and staff. Therefore, affirmative action responsibilities have been assigned accordingly as detailed below and in the policy.

Mayor

The Mayor is responsible for:

1. Evaluating the Affirmative Action performances of the City Department Heads and managers.
2. Ensuring the Affirmative Action Officer is following the guidelines as set forth in the plan.

Affirmative Action Officer

The City Human Resources Director and or designee shall be charged with the responsibility and authority to develop, implement, administer and review the Affirmative Action plan. The Officer shall have full access to all departmental policies and procedures, rules and regulations, including personnel files, background investigation reports, and other documents or information relating to any aspect of the City of Appleton Human Resources operations. The Director may assign a designee to assist with the Affirmative Action Officer responsibilities.

In the area of overall administration of the City's policy of Equal Employment and Affirmative Action, general responsibilities of the Affirmative Action Officer shall consist of, but are not limited to, the following areas:

1. Training: Provide training for department heads, managers and supervisors on the provisions of Affirmative Action and Equal Employment Opportunity laws, rules and regulations as they relate to individual departmental operations.
2. Review Internal Policies: Ensure that the City of Appleton's Human Resources policies, procedures and practices are in accordance with the Standards for a Merit System of Personnel Administration and Uniform Guidelines on Employee Selection Procedures. Review labor agreements for nondiscriminatory language and include in the contracts if it does not already exist.
3. Identify problem areas: Work with department heads to determine problem areas of employment and service delivery and to establish goals and methods, plus reasonable timetables to eliminate discrimination, should any exist, and to achieve a representative work force.

4. Communicate: Disseminate and communicate the City of Appleton's Equal Employment Opportunity/Affirmative Action Policy to all City of Appleton employees and make available to the Community.
5. Analysis and Research: Monitor the operation and effectiveness of the plan and compliance with the Standards and Uniform Guidelines, including periodic evaluation of hiring and promotion patterns, and take any remedial steps necessary to resolve shortcomings.
6. Recruitment Strategies: Develop strategies to ensure women and minorities, veterans, and people with disabilities who have the skills and who are currently in the workforce will be recruited through Affirmative Action measures.
7. Retention Efforts: Training provided to all employees on diversity/inclusion. The City of Appleton also has a strong Harassment Policy and an Affirmative Action Statement.
8. Ensuring equal opportunity and compliance: All employees will be afforded full opportunity and will be encouraged to participate in all company-sponsored educational, training, social and recreational functions. All facilities will be comparable for both sexes.

VII. DISSEMINATION OF THE POLICY

The City of Appleton has established various channels of communication to ensure that employees and the community are aware of the city's positive posture relative to equal employment opportunity and affirmative action.

Internal Dissemination

The policy statement signed by the Mayor will be posted prominently on key bulletin boards throughout the City where other State and Federal Employment related posters are posted.

The affirmative action policy will be included in the Human Resources Policy Manual and a statement covered in all collective bargaining agreements.

Formal training presentations will be made to management, supervisors, and employees from time to time concerning affirmative action.

New employees will be formally made aware of our Affirmative Action policy and Harassment and Discrimination policy during the City of Appleton "New Employee Orientation" program. Employees shall receive copies of said policies.

All employees will receive annually a copy of the Equal Employment Opportunity/Affirmative Action statement either through a special communication, City bulletin boards, training, City newsletter or intranet.

External Dissemination

The Affirmative Action plan will be disseminated to all unions representing City of Appleton employees.

The City will notify recruiting sources in writing that the City of Appleton is an equal opportunity employer.

The City of Appleton's application for employment will include the phrase "Equal Opportunity Employer".

The City of Appleton will communicate its commitment to equal employment opportunity by recruitment advertising through the regular media and through minority and women publications.

All "Help Wanted" advertisements will carry the notice "Equal Opportunity Employer" and this designation is included in recruiting brochures, the City web site and literature.

The federal government poster "Equal Opportunity and the Law" and pertinent State of Wisconsin posters will be posted at all locations where other State and Federal posters are posted.

All memberships paid for by the City shall be administered without regard to any of the protected classes. Such organizations shall not limit membership on the basis of any protected class.

VIII. STATEMENTS OF POLICY

Policy statement from the Mayor

TO: City of Appleton Employees
City of Appleton Suppliers
Employment Applicants
The Community

In our efforts to develop our affirmative action program, we hereby reaffirm and formalize our commitment to the principle of equal employment opportunity.

The City of Appleton's policy is to ensure equal employment opportunity for all without regard to race, color, creed, religion, sex, national origin, ancestry, age, disability, veteran status, arrest/conviction record, marital status, sexual orientation, gender and gender identity, political affiliation, results of genetic testing, honesty testing, pregnancy, childbirth or related medical condition, military status, use or nonuse of lawful product or any other non-job-related characteristic. While this document cannot be considered an employment contract between the City of Appleton and its employees, we view the principle of equal employment opportunity as a vital element in the employment process and as a hallmark of good management.

In developing our affirmative action program, we commit ourselves to:

- ◆ Recruiting, hiring, training, and promoting persons in all job classifications without regard to the protected classes noted above, or any other non-job-related characteristic.
- ◆ Ensuring that promotion decisions are in accordance with equal opportunity requirements by imposing only valid, job related requirements for promotional opportunities.
- ◆ Ensuring that all personnel actions relating to compensation, benefits, transfers, terminations, training, and education are administered in a nondiscriminatory manner.

In developing this Affirmative Action Plan, we have established goals to help correct the deficiencies.

It is our desire that the combination of measurable goals and directed effort will result in equal opportunity in the City of Appleton.

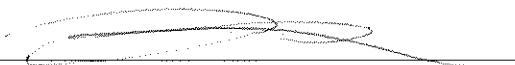
To ensure that our goals for equal opportunity may be achieved through our good faith efforts, we have established various levels of responsibility to both direct and oversee our affirmative action efforts.

The Human Resources Director for the City of Appleton, Jay Ratchman has been designated as the Equal Employment Opportunity Officer for the City.

The Human Resources Department is responsible for monitoring affirmative action efforts and for providing equal opportunity training and recommending outside resources. Individual managers and supervisors are responsible for ensuring that their employment decisions comply with principles embodied in Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, the Rehabilitation Act of 1973, the Vietnam Era Veterans Readjustment Assistance Act of 1974 and the Executive Order 11246, and Revised Order No. 4.

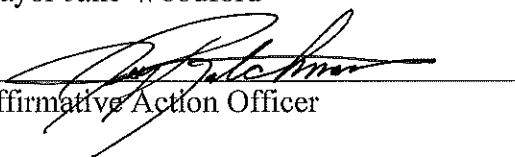
Each employee is responsible for bringing to the attention of the undersigned any employment decision that he or she feels conflicts with the letter or spirit of the law.

As the Mayor of this organization, I have the responsibility to ensure that equal employment and affirmative action receive a sufficient level of attention and management support. I will hold each manager accountable for the prompt execution of necessary preventive, corrective, and affirmative actions.



Mayor Jake Woodford

Date: 1/12/22



Affirmative Action Officer

Date: 1/12/2022

IX. WORK FORCE AND UTILIZATION ANALYSIS

Policy statement sent to Unions

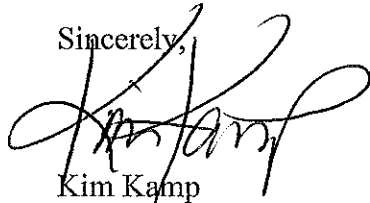
January 4, 2022

AFFIRMATIVE ACTION STATEMENT

The City of Appleton is an equal opportunity employer. Pursuant to our EEO policy, we are taking affirmative action to provide equal employment opportunities for all qualified and qualifiable persons without regard to race, color, creed, religion, national origin, ancestry, age, sex/gender, handicap or disability, arrest/conviction record, marital status, sexual orientation, gender identity and gender expression, political affiliation, results of genetic testing, honesty testing, pregnancy, childbirth or related medical condition, military service, disabled veteran or covered veteran status, service in the U.S. Armed Forces, the State Defense force, National Guard of any state, or any other reserve component of the United States or State military forces, use or nonuse of lawful products off the employer's premises during non-working hours, or any other non-merit factors, except where such factors constitute a bona fide occupational qualification or substantially relate to the circumstances of a particular job or licensed activity, and with proper regard for privacy and constitutional rights as citizens.

A copy of our current posted affirmative action policy is enclosed.

Sincerely,



Kim Kamp

Deputy Director Human Resources

X. WORK FORCE AND UTILIZATION ANALYSIS

The purpose of this section is to compare the composition of the current City work force, the composition of the labor force, and the skills of persons available to work for the City. This comparison will help determine the City's utilization of categories of males, females, and minorities. MSA shall mean Metropolitan Statistical Area for the Appleton-Neenah-Menasha-Oshkosh area.

1. Equal Employment Opportunity/Affirmative Action Program Data

a. Exhibit I: 2019 Economic and Workforce Profile Outagamie County

Population, labor force, and unemployment data for the area that the City of Appleton recruits from are provided in this profile, with a breakdown by age group, occupational group, and industry.

b. Exhibit II: Total Employed in the Civilian Labor Force Employed ages 16+ for Outagamie County

The employed population in Outagamie County is further broken down by industry, nationality, and gender.

c. Exhibit III: The City of Appleton EEO survey year 2021

This survey summarizes personnel by job category, nationality, and gender.

d. Exhibit IV: EEO Category Code Definitions

e. Exhibit V: EEO Ethnic Definitions

f. Exhibit VI: City of Appleton Affirmative Action Policy

g. Exhibit VII: City of Appleton Employment Discrimination Complaint Form

2. Analysis of Affirmative Action Program Statistics

The focus of this analysis is to determine whether certain groups of people are under-represented in the City of Appleton workforce. This is accomplished by comparing the composition of the current workforce with the composition of the labor force in the relevant recruitment area. Under represented is defined broadly as having fewer of a certain group in each job category than would reasonably be expected by their composition in the labor force. For under-representation not to exist requires the percentage representation of each sex, racial and ethnic group in all job categories to be similar between the work force and labor force. In addition, before such a determination can be made, availability data must also be examined. Under-utilization is defined as

having fewer minorities and women in a particular category than would reasonably be expected, based on their availability

- a) Exhibit I, page 3 indicates that the January 1, 2018 estimated population of Outagamie County is 184,541.
- b) Exhibit II, indicates that the total Outagamie County employed population is 97,602, consisting of 52.3% males and 47.7% females. Additionally, whites represent 92.3% of the employed population, with minorities representing 7.7% of the employed population.
- c) Exhibit II, indicates that the largest percentage of those employed are in “management, business, science, and arts occupations,” “service occupations,” or “sales and office occupations.” In these categories, females represent 53%, 62%, and 63.9% of the workforce respectively. The percentage of whites represent 93.2%, 90%, and 94.7% respectively.
- d) Exhibit III, indicates that percentage of City of Appleton employees (full-time and part-time) are comprised of 61.6% males and 38.4% females, with whites (full-time and part-time males and females) representing 94% of the workforce and minorities 6% of the workforce.
- e) Exhibit III, indicates that the percentage of (full-time) employees are employed as 1.7% “officials and administrators,” 16.1% “professionals,” 7% “technicians,” 33.9% “protective service workers,” 1.2% “paraprofessionals,” 12% “administrative support,” 5.9% “skilled craft workers,” and 19.9% “service-maintenance.”

X. IDENTIFICATION OF PROBLEMS/GOALS/TIMETABLES

Equal opportunity can be provided through the development of Human Resources policies and practices, which are fair and equitable in their treatment of current and potential employees. In order to attain such standards, an assessment of current policies and practices must be continuously undertaken. The components normally included in such an assessment are in the areas of recruitment and selection, which includes written and skill tests, interviews, qualification and reference inquiries, training, promotion, classification, corrective action, transfer, termination, and other conditions of employment. Affirmative action can be taken in the following areas to provide a Human Resources system that accommodates the principles and theory of equal opportunity.

1. The effectiveness of a successful recruitment and selection program with regard to affirmative action can be determined by examining the make up of applicants for position vacancies and by conducting an audit of the applicant flow through each step of the selection process for position openings within various job categories.

Records for these processes have been partially established and maintained by sex, race/ethnic groups, and age

Upon request a report to show the applicant flow for all open positions is distributed to Department Directors.

Target Date: Ongoing

2. In addition to record keeping systems, special efforts must be exerted to recruit qualified under-represented applicants for job categories in which individuals are under-represented. The Human Resources Department will make an affirmative effort in its recruitment for women and minorities for under-represented positions.

The City of Appleton utilizes the Internet, Job fairs and lists of women and minority organizations that the City Open Position list is sent to weekly. The Human Resources Department uses an online application system that allows for position to be widely advertised and allows potential applicants to register for automatic notification when positions become available. The City Diversity and Inclusion Coordinator also utilizes community connections to highlight recruitment opportunities.

Target Date: Ongoing

3. The validity, reliability and objectivity of selection devices, including written tests, interview questions, background and reference checks, need to be continuously reviewed and refined in accordance with the guidelines. These devices, in order to be lawful, should be job-related and should eliminate adverse effects on groups that are under-represented in City of Appleton job classifications.

Human Resources will continue to review current devises to ensure no potential problems exist.

Target Date: Ongoing

4. Opportunities for training, promotions and the like should be equally offered without regard to non-merit factors. Systematic efforts to discover employees with potential and develop them through career advancement in both the classroom and on the job need to be developed. Such training programs can be used, as a vehicle to advance persons to job categories in which they are under-represented, but it would also assure that employees are trained as needed to assure high quality performance.

Efforts are made to work with employees when a particular department identifies potential career advancement. The City's insurance carrier offers many types of training that are offered to employees. Additionally, the City conducts annual General Employee and Supervisory Training that is required.

Target Date: Ongoing

5. The Classification Plan for non-represented employees needs to be continuously evaluated to ensure the provision of equitable and adequate compensation. This would include updating job descriptions when significant changes in duties occur and conducting or commissioning salary surveys to ensure salaries are competitive to recruit and retain competent employees.

Each time a position becomes available the job description and the job task analysis are reviewed and updated. The Compensation Classification Plan is under review currently to ensure it is competitive with the market, this project is scheduled to be complete in July 2022.

Target Date: Ongoing

6. Review issues that are brought to the attention of the Human Resources Department in the exit interview process that relate to affirmative action issues, while maintaining the confidentiality of the individual providing the information (unless otherwise directed).

Human Resources Generalists performing the exit interviews will inform the Director or Deputy Director of any concerns discovered as part of the exit interview process. In addition all exit interview forms are reviewed by the Director and Deputy Director.

Target Date: Ongoing

7. Continue to evaluate job specifications to determine the job relatedness of the minimum qualifications, training and experience requirements, to identify and remove any artificial barriers to employment.

Human Resources Generalists will continue to review and modify job specifications, as jobs become open to ensure that no artificial barriers exist.

Target Date: Ongoing

8. Develop and conduct a training program for all City of Appleton Supervisors to ensure knowledge and compliance with legal obligations related to employment practices covered by Affirmative Action.

All City of Appleton supervisors will be trained on this plan and their legal obligations as it relates to Affirmative Action.

Target Date: Ongoing

9. Post a statement in the Human Resources Department where applicants typically fill out applications. Follow VII, Dissemination of the Policy and include a mechanism for reporting complaints.

The Affirmative Action policy is posted prominently with other State and Federal Posting, on the internet where applicants apply for City positions, on bulletin boards throughout the City where employees report to work and on other pertinent communications for all employees/applicants.

Target Date: On-going

