

Northeast Oklahoma Community Action Agency, Inc.



Affirmative Action Plan February 2023

NORTHEAST OKLAHOMA COMMUNITY ACTION AGENCY, INC.

ON

AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY


Consistent with federal and state laws and guidelines established for affirmative action and equal employment opportunity, I would like to affirm this agency's continuing policy to provide equal employment and advancement opportunity in all job classifications of this agency without regard to political or religious opinion or affiliation, race, color, creed, gender, age, national origin or physical handicap, so long as the physical handicap does not render the person unable to do the work for which he/she is employed.

The principles of equal employment opportunity apply to all employment practices and personnel actions throughout the agency, including recruiting, hiring, promotions, demotions, separations, transfers, reduction in force (RIF), recall, compensation, benefits and all other terms and conditions of employment. I want to remind each employee that all personnel actions, as well as decisions relating to employment practices, are to be based in accordance with the spirit of equal employment opportunity for all.

The agency has developed an Affirmative Action Plan to help us achieve our goal of equal employment opportunity for all. As the Executive Director, I have the responsibility of implementing the plan, including monitoring and evaluating our progress.

In addition, the NEOCAA Planner/Grant Writer is assigned to serve as Affirmative Action/Equal Employment Opportunity Officer for this agency. He/She will be available to any employee having questions or needing assistance in regard to affirmative action or equal employment opportunity in this agency.

My personal commitment to this policy is complete. I expect each and every employee to perform their duties and responsibilities in a manner that will demonstrate this agency's firm commitment in the areas of affirmative action and equal employment opportunity.


John Ann Thompson, Executive Director

2-27-23
Date

MEMORANDUM

To: Northeast Oklahoma Community Action Agency, Inc. Employees


From: John Ann Thompson, Executive Director

Re: NEOCAA Equal Employment Opportunity Officer

In accordance with the Affirmative Action Plan, the NEOCAA Planner/Grant Writer is appointed as the Equal Opportunity Officer (EEO). He/she is located at the Northeast Oklahoma Community Action Agency office, 856 E. Melton Drive, Jay, OK 74346. His/Her work telephone number is 918-253-4683, Extension 127.

The NEOCAA Planner/Grant Writer is granted the necessary authority to carry out the duties and functions required for the Equal Employment Opportunity Officer. Employees and clients are encouraged to utilize the services of the EEO to ensure that the agency's commitment to principles, ethics, and practices of Affirmative Action are being properly administered.


John Ann Thompson
Executive Director

 02/24/23
Lindi Conover-Thompson
NEOCAA Planner/Grant Writer
EEO Officer

DUTIES OF THE AFFIRMATIVE ACTION COMMITTEE

1. In accordance with agency by-laws, the Affirmative Action Committee shall be composed of Board Members serving on the Personnel Committee. The Equal Opportunity Officer will assist the Affirmative Action committee in an advisory capacity.

2. The Affirmative Action Committee shall:

- A. Ensure that all committee members are cognizant that Local, State and Federal Civil Rights Laws and Legislation exist, which are applicable to the programs we operate.
 - B. Review and evaluate current methods of Equal Opportunity and nondiscrimination practices within the total operation and support functions of the agency and identify and solve existing problems.
 - C. Approve agency written Affirmative Action Plan and Equal Opportunity goals and objectives.
 - D. Provide for periodic evaluation of the Agency Affirmative Action Plan, so that progress may be assessed, and future revisions and programs are made more effective.
 - E. Demonstrate and seek compliance with existing Civil Rights Laws and mandates and be prepared to bring violations of such laws to the attention of the appropriate law enforcement authorities.
 - F. Utilize Community Action Agency practices to affect change of any institutional policy which discriminates against any individual within the areas of Community Development, health, housing, education, voting rights and all other areas of Civil Rights protection.
3. Individual members of the Affirmative Action Committee may be assigned the authority for the accomplishment of various goals and objectives, or the Affirmative Action Committee may delegate various members of the Board, or agency staff, with the approval of the Executive Director of Northeast Oklahoma Community Action Agency, Inc.
 4. The Affirmative Action Committee shall meet on a regularly scheduled basis, or as called by the committee chairperson, for considering any matters coming within the purview of Affirmative Action.

CHAPTER I

POLICIES, PROCEDURES, AND RESPONSIBILITIES

SECTION I

Equal Employment Opportunity General Policy Statement:

It is the policy of Northeast Oklahoma Community Action Agency, Inc., Board of Directors to be fair and equitable in all its relations with the employees and applicants for employment without regards to race, color, religion, creed, sex, national origin, age, ancestry, disability, marital status, pregnancy, political affiliation or belief, or membership in a recognized uniformed service. The Board of Directors continues to be committed to the concept of Equal Employment Opportunity as a necessary element of basic merit system principles that all persons shall be afforded equal access to a vacant position in the agency limited only by their ability to perform the task. Equal opportunity can best be affected through definite programmed Affirmative Action. Positive steps must be taken to remove conditions which could result in unlawful employment discrimination. The Board of Directors believes that an effective Affirmative Action Plan not only benefits those who could have been denied Equal Employment Opportunity, but also benefits those agency programs and services, which could have under utilized useful talents, resources, and skills, especially among women, minorities, individuals with a disability and other identified groups. The Board of Directors, through adoption of the Affirmative Action Plan, commits the agency and all its programs to a result-oriented personnel program aimed at achieving Equal Employment Opportunity in all occupational levels.

SECTION II

General Objectives of the Agency Affirmative Action Plan

- A. To achieve and maintain employment levels for identifiable groups throughout the classes of positions in proportion to their availability in the relevant labor force and in proportion to the types of clients that we serve. This will be achieved through proper recruitment, hiring, promotion, and training actions.
- B. To assign responsibility and accountability for Affirmative Action compliance, the most crucial parts for policy implementation are at supervisory levels, where decisions affecting hiring, assignment, training, promotion, compensation and disciplinary action are initiated.
- C. To promote harmonious employee relations by providing training regarding Northeast Oklahoma Community Action Agency, Inc. Personnel Policies and fair employment practices to supervisory employees, increasing employees' awareness and acceptance of race/cultural, sex and disability differences among employees and prohibiting unlawful

harassment of employees in the workforce.

SECTION III

Applicable Laws

- A. **Title VII of the Civil Rights Act of 1964** - Prohibits discrimination in any aspect of employment, including "help wanted" advertising and pre-job testing, on the basis of race, color, religion, sex or national origin. In 1978, the Pregnancy Discrimination Act amended Title VII to prohibit bias on the basis of pregnancy.
- B. **The Equal Pay Act of 1963** - Part of the Fair Labor Standards Act, this law prohibits pay differential based on sex.
- C. **The Age Discrimination in Employment Act of 1967** - This statute prohibits employment discrimination against individuals aged 40 or older. It applies to employers of 20 or more workers, labor unions, and employment agencies.
- D. **The Rehabilitation Act of 1973** - Section 503 of the law prohibits discrimination against handicapped persons by Federal contractors. These employers are required to take Affirmative Action in hiring qualified individuals with disabilities. Section 504 of the Act prohibits discrimination against qualified individuals with handicaps by institutions of programs that receive federal funds.
- E. **The Vietnam-Era Veteran's Readjustment Assistance Act of 1974** - This law requires Affirmative Action by Government contractors to employ and advance in employment-qualified veterans of the Vietnam era and disabled veterans.
- F. **The Immigration Reform and Control Act of 1986** - An amendment to the Immigration and Naturalization Act, this statute prohibits employers of four or more workers from discriminating on the basis of citizenship status or national origin. The Act's anti-discrimination provisions do not apply to illegal aliens, and there are exceptions where citizenship is required by law.
- G. **The American With Disabilities Act of 1990** - Effective in 1992, this statute prohibits employment discrimination against individuals with disabilities and requires places of public services and accommodations to be usable and accessible. Employers with 25 or more workers are covered by the law as of July 26, 1992 and employers of 15 or more workers are covered beginning July 26, 1994. There are no Affirmative Action requirements under ADA.
- H. **Executive Orders** - E.O. 11246 bans discrimination on the basis of race, sex, religion, color, and national origin by Federal contractors in excess of \$10,000.00. The order includes Affirmative Action requirements. E.O. 1141 prohibits discrimination on the

basis of age by Federal contractors.

- I. **The Civil Rights Act of 1991** - This act reverses seven U.S. Supreme Court decisions and creates rights to compensatory and punitive damages, as well as a jury trial for victims of intentional discrimination.
- J. **The Family and Medical Leave Act** - Requires employers with 50 or more employees to provide up to 12 weeks unpaid leave for specific reasons outlined in the act. Effective August 1993.
- K. **Uniformed Services Employment and Reemployment Rights Act of 1994** - Prohibits employers from discriminating against prospective or current employees in hiring, reemployment, retention in employment, and promotion, or any employment benefit, because of past, current, or future service or application for or membership in a uniformed service.
- L. **The Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) as amended by the Veterans Employment Opportunities Act of 1998** - Stipulates that federal contractors or subcontractors with contracts of \$25,000 or more must take affirmative action to hire and promote qualified special disabled and Vietnam-era veterans, as well as other veterans who served on active duty during a war or earned a campaign or expedition badge. In addition, employers covered by the VEVRAA must list "all employment openings" with an appropriate local office of the federal-state employment service system, which will give priority in referrals to veterans. Employers with 50 or more workers and federal contracts of at least \$50,000 are required to develop written affirmative action plans to improve the hiring and advancement of veterans.

SECTION IV

Assignment of Responsibilities in Support of the Program

BOARD OF DIRECTORS

THE BOARD OF DIRECTORS WILL:

1. Actively and aggressively support Northeast Oklahoma Community Action Agency, Inc., for Equal Employment Opportunity through encouragement and dissemination of Affirmative Action oriented information to the general public and by requiring and reviewing Affirmative Action Progress Reports.

THE EXECUTIVE DIRECTOR

THE NORTHEAST OKLAHOMA COMMUNITY ACTION AGENCY, INC. EXECUTIVE DIRECTOR WILL:

1. Issue a policy statement to support the agency's Affirmative Action Plan;

2. Provide continuing top management support for the Affirmative Action Program;
3. Appoint an EEO Officer to develop/monitor and execute the agency's Affirmative Action Program;
4. Evaluate the degree to which the goals and objectives of the Affirmative Action Plan have been attained;
5. Provide yearly audit reports to the NEOCAA Board of Directors. Said audit reports will review the status of year-to-date hiring, promotions, terminations, age, race/ethnicity and sex of employees;
6. Resolve any problem areas reported by the EEO Officer.

THE EQUAL EMPLOYMENT OPPORTUNITY OFFICER (EEO)

THE EQUAL EMPLOYMENT OPPORTUNITY OFFICER WILL:

1. Develop the Affirmative Action Plan;
2. Design and implement a control system to periodically evaluate program effectiveness and determine the degree to which goals have been met;
3. Identify problem areas, report findings to the Executive Director and recommend solutions to problems, including remedial or disciplinary action;
4. Develop and implement the internal and external communication system for promoting the Equal Employment Opportunity Program of the agency;
5. Keep the agency informed of developments in the EEO area.
6. Conduct periodic audits of agency programs to remove impediments to goal attainment;
7. Serve as liaison between programs, enforcement agencies, minority/woman groups and other community groups as appropriate.
8. Receive, investigate and work to resolve internal complaints of alleged discrimination;
9. Provide technical assistance to the Affirmative Action Committee and Board of Directors regarding policies, procedures and resources available to the program.

DIRECTORS AND MANAGEMENT PERSONNEL

THE MANAGEMENT STAFF WILL:

1. Communicate the agency's EEO policies and familiarize employees with the Affirmative Action Plan;
2. Assist in problem identification and establishment of goals and objectives;
3. Review qualifications of all employees to ensure minorities and females are given full promotional and transfer opportunities;
4. Analyze and evaluate employment practices;

EMPLOYEES

EMPLOYEES WILL:

1. Familiarize themselves with the agency's EEO policies and Affirmative Action Plan and make a good faith effort to adhere to their responsibilities within the Plan;
2. Aid Directors in carrying out their responsibilities with regard to the Equal Employment Opportunity Program;
3. Apply all laws, rules, regulations, policies and procedures fairly and impartially to all persons, without regard to race, color, sex, age, or national origin;
4. Exhibit an attitude of mutual respect, courtesy, and cooperation toward fellow employees and the public.

DISSEMINATION OF THE PLAN AND POLICY

INTERNAL DISSEMINATION

In order to ensure that Northeast Oklahoma Community Action Agency, Inc. is an Equal Employment Opportunity agency, the Affirmative Action Plan will be submitted to the NEOCAA Board of Directors for approval at a regularly scheduled meeting.

Each Program Director will receive copies of the entire plan for their staff and answer questions the employees might have about the plan.

All employees will be informed of the agency's policy on Equal Employment Opportunity and the Affirmative Action Program through such means as:

1. Presentation and discussion of the program by immediate supervisors for all new hires during initial orientation, and at general employment orientations and training programs dealing with agency employment practices.
2. Posting of EEO Policy Standards and Federal EEO Notices on the agency bulletin board, dissemination of Affirmative Action Plan and personnel rules to all programs.

EXTERNAL DISSEMINATION

The agency will disseminate the Affirmative Action Policy and Plan to any NEOCAA funding source at their request or to meet funding source requirements. When position vacancies exist within the agency, Northeast Oklahoma Community Action Agency, Inc. will make them available to all employees according to the internal promotion guidelines adopted by the NEOCAA Board of Directors. The Executive Director will authorize the posting of an advertisement for the position on an in-house basis first to determine if qualified candidates for the job are within the agency and are interested in the position.

If no in-house applicant is selected to fill the vacant position, the job then will be posted with the Oklahoma Employment Security Commission (OESC) at https://www.ok.gov/oesc_web/ and/or will otherwise publicly advertise. All job announcements indicate that this agency is an Equal Employment Opportunity agency.

Written and personal contact will be made with minority and women's organizations, community agencies and employment training programs to inform them that Northeast Oklahoma Community Action Agency, Inc., is an Equal Employment Opportunity Employer, and encourage employment application by minorities, women, disabled, and other protected group members.

SECTION V

Purchasing and Sub-Contractors

Purchasing and subcontracting preference shall be given by this agency to vendors, contractors and suppliers who are in compliance with Federal, State, and Local law, ordinances and regulations defining and regulating Equal Employment Opportunity. Minority owned businesses will be utilized to the fullest practicable extent.

CHAPTER II

AFFIRMATIVE ACTION PLAN EVALUATION AND DEVELOPMENT

SECTION I

Summary of Evaluation and Identification of Problem Areas:

Between January 1, 2022, and December 31, 2022, the workforce of Northeast Oklahoma Community Action Agency, Inc. increased by one (2) employees, 44 in 2021 to 46 in 2022. During the year, a total of thirteen (13) persons were hired, four (4) were promoted, nine (9) resigned and four (4) were terminated. While the aftermath of the COVID-19 pandemic continues to disrupt staff turnover and movement nationwide, national, regional, and local trends indicate that the labor force is beginning to stabilize somewhat. The resignations and in 2022 (13 in total) were lower than the last reporting period of 2021 (17).

NEOCAA strives to employ American Indians in line with their actual representation within the service area. Within the service area, an estimated 44.1% of the population is American Indian; roughly 22% of the NEOCAA workforce are American Indian and about 38% of the new hires were American Indians. These are both encouraging numbers. The percentage of Hispanic employees is 2.2%, which is 3.24% below their average representation within the working age population in the service area (5.44%). One new hire was Hispanic. The percentage of Asian employees is 2.2%, which is slightly above their average representation within the working age population in the service area (0.84%). The percentage of Black employees is 0%, which is slightly lower than the actual representation in the working age population (1.26%). The percentage of individuals reporting 2 or more races is 0%, which is 9.7% below their actual representation within the working age population in the service area (9.7%). None of the new hires were individuals reporting 2 or more races.

The Northeast Oklahoma Community Action Agency, Inc. continues to maintain female staff (76%) in excess of their actual representation within the five counties (50.3%). Northeast Oklahoma Community Action Agency, Inc. employees one disabled veteran. Supervisors will be encouraged to continue to be sensitive to employment opportunities of Black and Hispanic employee in the agency. Details may be found in the Job Group Analysis and the Personnel Action Audit Report of the Affirmative Action Plan. The Affirmative Action Plan Evaluation Process, conducted during this plan revision, has revealed the following:

Area I

Affirmative Action Equal Opportunity Practices and Procedures

NEOCAA maintains an excellent ratio of females in executive management and supervisory positions. The agency currently has four (4) individuals in executive management positions and current staffing in these positions consists of four (4) females (100%), three (3) of whom are Native American. Additionally, NEOCAA has a total of six (6) individuals employed in mid-level management/supervisory positions. Total female staffing level is 75% compared to representation at 50.5% in the working age population in the agency's service area. Total minority

staffing level is 34% of the current workforce, compared to 43.3% in the working age population in the agency's service area.

Area II **Affirmative Action to Insure Equal Opportunity for participation within all Phases of the Northeast Oklahoma Community Action Agency, Inc.**
According to 2019 American Community Survey data (the latest available data), the population in the five-county service area (Adair, Cherokee, Craig, Delaware and Ottawa counties) is 159,161. Of that population, 92,522 (58.13%) are white; 1,730 (1.09%) are black; 44,352 (27.87%) are American Indian; 1,363 (.86%) are Asian; 8,953 are Hispanic (5.62%); and 15,859 (9.96%) are two or more races. Northeast Oklahoma Community Action Agency, Inc. provides service for the low- and moderate-income populations of Adair, Cherokee, Craig, Delaware, and Ottawa Counties at locations in each county. Program accessibility for handicapped participants is available in all of the agency facilities. Of the eighteen (18) seats currently filled on the NEOCAA Board of Directors, nine (9) are American Indian, and ten (10) are female.

Area III **Affirmative Action to Change Disciplinary Institutional Policies, Practices and Attitudes within the Community**
Affirmative Action Policies within the area are to be directed toward the improvement in services and delivery systems, such as housing, street, utilities, code enforcement, transportation and the fair and equitable representation of all appropriate segments of the community on boards, committees, and etc. It is necessary for area and neighborhood groups to affect strong leadership and to identify and address any discriminatory practices.

Area IV **Affirmative Action to Promote Equal Employment Opportunity through Effective Use of Northeast Oklahoma Community Action Agency, Inc., Purchasing Policy**
Northeast Oklahoma Community Action Agency, Inc. recognizes that using its purchasing power in a constructive way is but one of the many means to both endorse and demonstrate its commitment to Equal Employment Opportunity. Where possible, the Agency utilizes minority vendors, suppliers and contractors when they offer goods and services of satisfactory quality and value.

SECTION II

Utilization Analysis

Northeast Oklahoma Community Action Agency, Inc. has a current staff of forty-six (46) employees. An average composite of all minorities employed by the agency is 46.67% of assigned average strength. Women employed constitute 84.4% of the agency's workforce.

SECTION III

Goals and Objectives

Equal Employment Opportunity Program Work Goals and Objectives for 2023 are depicted in Table 1.

**TABLE 1
EQUALITY EMPLOYMENT OPPORTUNITY
PROGRAM WORK GOALS AND OBJECTIVES**

Activities to Achieve Goals	Estimated Time Frame	Staff Responsible	Assistance Required
Goal: To direct, monitor and facilitate agency AA/EEO activities to conform with all required EEO regulations and other government mandates and regulations, and to insure aggressive agency-wide participation in all AA/EEO related areas.	1/1/2023 – 12/31/2023	EEO Officer Executive Director	NEOCOA Board, supervisors, required federal & state agencies
1. Provide technical assistance to the Affirmative Action Committee in all AA/EEO related areas.	1/1/2023-12/31/2023	EEO Officer Executive Director	Appropriate government (state, federal, etc.) and publication & policy statements
2. Provide assistance and training to all NEOCAA supervisory personnel.	On-going	EEO Officer Executive Director HR Manager	Guest speakers or trainers from outside businesses & government agencies
3. Publicize the NEOCAA commitment to the AA/EEO Plan by means of local newspaper, television and radio public service announcements, etc.	On-going	EEO Officer	Local media outlets
4. Seek additional advice and recommendations concerning the improvement of the existing agency EEO policies and procedures.	On-going	EEO Officer	Agency Program Directors
5. Monitor agency policies concerning goods and service supply sources, and	On-going	Services Director Executive Director	Current and timely government purchasing

source compliance with Affirmative Action principles			regulations
---	--	--	-------------

TABLE 1
EQUALITY EMPLOYMENT OPPORTUNITY
PROGRAM WORK GOALS AND OBJECTIVES (Page 2)

Activities to Achieve Goals	Estimated Time Frame	Staff Responsible	Assistance Required
6. Provide individual counseling and assistance to employees seeking remedies to discrimination problems on or off the job	On-going	EEO Officer HR Manager	
7. Keep current and up-to-date with regard to legal developments within the AA/EEO field.	On-going	EEO Officer Executive Director HR Manager	Monthly subscriptions & publications

GRIEVANCE PROCEDURES FOR CHARGES OF DISCRIMINATION

The purpose of this section is to set forth the principles of the agency and to proscribe uniform procedures for fair and impartial consideration and equitable disposition of grievances presented by individual employees regarding violation of law and policy in their employment.

An employee may state in writing any objections he/she may have in connection with his/her grievance regarding discrimination for prompt consideration.

The following procedure will be used in filing discrimination grievances:

1. An employee must place in writing any objection within five (5) working days of the occurrence or action and deliver the same to the appropriate Program Director.
2. The Program Director shall thereafter review the matter and prepare written notice of action to the employee within five (5) working days.
3. If the employee is not satisfied with the results of this review, he/she may forward the written objection to the Executive Director within five (5) working days of receipt of written notice from the Program Director.
4. The Executive Director shall thereafter review the matter and prepare written notice of action to the employee within five (5) working days.
5. If the employee is not satisfied with the results of the review (as specified in paragraph 4) then he/she may, within five (5) working days of receipt of written notice of results of the review, forward a request for further review to the NEOCAA Board of Directors.
6. The NEOCAA Board of Directors (or a committee assigned by the Chairperson) shall arrange for a hearing to be held within ten (10) working days of the employee's written request for further review. The employee and supervisors will have the opportunity to present any relevant evidence and testimony at said hearing.
7. The Board of Directors (or assigned committee) shall advise the Chairperson of the Board of the decision, in writing, within forty-eight (48) hours after the hearing. The Chairperson will be requested to forward such information to the employee and Executive Director within twenty-four (24) hours of receipt.
8. Subsequent to review of the matter by the Board of Directors (or assigned committee), if the employee is not satisfied with the results, he/she may, within forty-eight (48) hours of receipt of written notice to him/her of the conclusion and results of such review, request review of the decision by the Board of Directors. The Board of Directors shall not be required to extend such review.

9. The Chairperson of the Board of Directors, or his/her designee, will as soon as possible thereafter, notify the employee of the granting or denial of further review, as the Board of Directors may deem appropriate. Such review will be granted or denied on the basis of the written statements and findings related to the matter as contained in the employee's file at the time of the request for the Board of Director's review.
10. If review is granted, it shall be referred to the entire NEOCAA Board of Directors at its next regularly scheduled meeting. The employee and supervisors will have the opportunity to present any relevant evidence and testimony.
11. All reviews before the Program Director, Executive Director, and Board of Directors shall be private and not open to the public. An employee may be represented by counsel at any review or hearing.

If an employee is disciplined, suspended, or discharged from employment, such disciplinary action, suspension or discharge shall take effect according to the written notice of such actions given to the employee by the Program Director, and shall remain in effect according to the notice even though review proceedings of grievance hearing concerning such matter have been instituted by the employee and are pending and not completed; provided, however, that upon completion of any review or hearing, if the disciplinary action, suspension or discharge is modified or revoked, the employee shall be immediately restored with pay and benefits, and his/her personnel records adjusted as may be consistent with the modification or revocation action of the reviewing authority.

SEXUAL HARASSMENT

Northeast Oklahoma Community Action Agency, Inc. recognizes its responsibility to all employees to maintain a working environment free from sexual harassment. To achieve this type of environment, appropriate methods such as affirmatively addressing the subject, expressing strong disapproval, developing appropriate sanctions and informing employees of their right to raise the issue of sexual harassment is utilized to alert employees of the problem.

Harassment on the basis of sex is a violation of Section 703 of Title VII of the Civil Rights Act. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute harassment when (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

For employment purposes within Northeast Oklahoma Community Action Agency, Inc., sexual harassment shall be defined as: (1) demands or requests for sexual attentions; (2) unwanted sexual advances; (3) verbal comments that are sexually oriented; (4) interference with

another's work performance through any type of sexually oriented conduct; or (5) creating a work environment that is offensive because of sexually oriented action.

Procedures for Handling Sexual Harassment Incidents:

Sexual harassment in any form will not be tolerated. If employees, male or female, believe that they are being sexually harassed, they are encouraged to report any incident(s) to their Program Director, immediate supervisor, EEO Officer, or the Executive Director within fifteen (15) days of the incident(s). Information received will remain confidential, and all sexual harassment complaints will be investigated by the Executive Director.

If, through the investigation, it is found that the complaint is valid, immediate appropriate disciplinary action will be taken. Depending on the severity of the harassment, the discipline may range from a verbal warning or a written warning being placed in the offending employee's personnel file, to immediate termination. If terminated, the employee will receive a letter stating the cause of the action and the right to appeal to the Board of Directors.

All Program Directors or supervisors of Northeast Oklahoma Community Action Agency, Inc. who are aware of any incident of sexual harassment in the workplace are responsible for reporting such incidents to the Executive Director.

It is the responsibility of each Program Director to bring to the attention of all their staff the provisions of, and implementation of, this policy upon adoption by the Board of Directors.

JOB GROUP ANALYSIS

Northeast Oklahoma Community Action Agency, Inc.

As of December 31, 2022

Job Category	Total Employees	MALE						Total Males		FEMALE						Total Females
		White	Black	Asian	Amer. Ind	Hisp.	2+ Races			White	Black	Asian	Amer. Ind.	Hisp.	2 Races	
Executive Managers	4							0		1			3			4
Mid-Level Managers	6	1			1			2		3			1			4
Professionals	9	1						1		6		1	1			8
Admin Support	19				1			1		13			5			18
Craft Workers	1	1						1								0
Laborers	6	4			1	1		6								0
Service Workers	1							0		1						1
Technicians	0							0								0
Operatives	0							0								0
Sales Workers	0							0								0
Total Workers	46	7	0	0	3	1	0	11		24	0	1	10	0	0	35

Northeast Oklahoma Community Action Agency, Inc.
Personnel Action Audit Report: January 1, 2022 - December 31, 2022

New Hires

Total New Hires = 13	Age			Gender		Ethnicity					
	<35	35-54	55+	Male	Female	White	Am Ind	Hisp.	Black	Asian	2 Races
	8	4	1	2	11	7	5	1	0	0	0
New Hires, Males = 2	2					0	1	1	0	0	0
		0				0	0	0	0	0	0
			0			0	0	0	0	0	0
New Hires, Female = 11	6					4	2	0	0	0	0
		4				2	2	0	0	0	0
			1			1	0	0	0	0	0
% NEOCAA Hires	61.54%	30.77%	7.69%	15.38%	84.62%	58.33%	38.46%	7.69%	0.00%	0.00%	0.00%

Promotions

Total Promotions: 4	Age			Gender		Race					
	<35	35-54	55+	Male	Female	White	Am Ind	Hisp.	Black	Asian	2 Races
	2	2		2	2	3	1	0	0	0	0
Total Promotions, Male: 2	1					1	1	0	0	0	0
		1				1	0	0	0	0	0
			0			0	0	0	0	0	0
Total Promotions, Female: 2	1					0	0	0	0	0	0
		1				1	0	0	0	0	0
			0			0	0	0	0	0	0
% NEOCAA Promotions	50.00%	50.00%	0.00%	50.00%	50.00%	75.00%	25.00%	0.00%	0.00%	0.00%	0.00%

Northeast Oklahoma Community Action Agency, Inc.
Personnel Action Audit Report: January 1, 2022 - December 31, 2022 (Continued)

Resignations

Resignations											
Total Resignations: 9	Age			Gender		Race					
	<35	35-54	55+	Male	Female	White	Am Ind	Hisp.	Black	Asian	2 Races
	4	1	4	2	7	5	3	1	0	0	0
Total Resignations, Male: 2		1				1					
			1			1					
Total Resignations, Female: 7	4						3	1			
		0									
			3			3					
% of total NEOCAA Resignations	44.44%	11.11%	44.44%	22.22%	77.78%	55.56%	33.33%	11.11%	0.00%	0.00%	0.00%

Terminations

Terminations											
Total Terminations: 4	Age			Gender		Race					
	<35	35-54	55+	Male	Female	White	Am Ind	Hisp.	Black	Asian	2 Races
				2	2	1	2	1	0	0	0
Total Terminations, Male: 2	1							1			
		1					1				
Total Terminations, Female: 2	2					1	1				
% of total NEOCAA Terminations	0.00%	0.00%	0.00%	50.00%	50.00%	25.00%	50.00%	25.00%	0.00%	0.00%	0.00%

Profile of General Demographic Characteristics: U.S. Census Population Estimates
Adair, Cherokee, Craig, Delaware, & Ottawa Counties in Oklahoma

Source: U.S. Census Bureau, 2019: ACS 5-year Estimate Comparison Profile (Table CP05)

	Adair	Cherokee	Craig	Delaware	Ottawa
Total population	22,220	48,664	14,390	42,433	31,454
Male	11,043	23,845	7,353	20,919	15,444
Male %	49.70%	49.00%	51.10%	49.30%	49.10%
Female	11,177	24,819	7,037	21,514	16,010
Female %	50.30%	51.00%	48.90%	50.70%	50.90%
0-19	6,533	12,750	3,497	9,632	8,901
0-19 year %	29.40%	26.20%	24.30%	22.70%	28.30%
20-34 years	4,000	11,339	2,576	6,450	5,725
20-34 years %	18.00%	23.30%	17.90%	15.20%	18.20%
35-54 years	5,488	10,852	3,540	9,547	7,234
35-54 %	24.70%	22.30%	24.60%	22.50%	23.00%
55-64 years	2,778	5,791	1,957	6,492	3,932
55-64 years %	12.50%	11.90%	13.60%	15.30%	12.50%
65+	3,400	7,932	2,820	10,354	5,693
65+ %	15.30%	16.30%	19.60%	24.40%	18.10%
White	9,355	24,770	9,425	27,709	21,263
White %	42.10%	50.90%	65.50%	65.30%	67.60%
Black	44	681	446	212	346
Black %	0.20%	1.40%	3.10%	0.50%	1.10%
American Indian	9,799	16,302	3,137	9,420	5,693
American Indian %	44.10%	33.50%	21.80%	22.20%	18.10%
Asian, Hawaiian, Pacific Islander	178	341	115	509	220
Asian, Hawaiian, PI %	0.80%	0.70%	0.80%	1.20%	0.70%
Hispanic	1,511	3,504	532	1,612	1,793
Hispanic %	6.80%	7.20%	3.70%	3.80%	5.70%
Two or more Races	2,244	5,353	1,137	4,074	3,051
Two or more Races %	10.10%	11.00%	7.90%	9.60%	9.70%

Affirmative Action Worksheet 2022

Personnel Actions by Job Category
January 1, 2022 - December 31, 2022

Job Category	Total Hired	Total Promoted	Total Terminated	Total Resigned
Executive Managers				
Mid-level Managers	1			
Professionals	1	2		
Admin Support	9		2	8
Craft Workers				
Laborers	2	2	2	1
Service Workers				

Affirmative Action Audit Summary
January 1, 2022– December 31, 2022

The Affirmative Action Plan has been reviewed. The following items should be of interest to the Affirmative Action Committee:

- Between January 1, 2022, and December 31, 2022, the workforce of Northeast Oklahoma Community Action Agency, Inc. increased by two (2) employees, from 44 in 2021 to 46 in 2022.
- A total of thirteen (13) persons were hired, four (4) were promoted, nine (9) resigned and four (4) were terminated.
- Resignations and terminations in 2022 (13) were lower than last reporting period of 2021 (17). The COVID-19 pandemic continues to have significant impacts to workforces locally, throughout the state and region, and nationally, but are beginning to level out.
- NEOCAA strives to employ American Indians in line with their actual representation within the service area. Within the service area, an estimated 44.1% of the population is American Indian; roughly 22% of the NEOCAA workforce are American Indian and about 38% of the new hires were American Indians.
- The percentage of Hispanic employees is 2.2%, which is 3.24% below their average representation within the working age population in the service area (5.44%). One new hire was Hispanic.
- The percentage of Asian employees is 2.2%, which is slightly above their average representation within the working age population in the service area (0.84%).
- The percentage of Black employees is 0%, which is slightly lower than the actual representation in the working age population (1.26%).
- The percentage of individuals reporting 2 or more races is 0%, which is 9.7% below their actual representation within the working age population in the service area (9.7%). None of the new hires were individuals reporting 2 or more races.
- Northeast Oklahoma Community Action Agency, Inc. continues to maintain female staff (76%) in excess of their actual representation within the five counties (50.3%).