

**Executive Order 11246 Affirmative Action Program (AAP)
For Minorities and Women**

**Hofer Wysocki Architects, LLC
11460 Tomahawk Creek Pkwy
Leawood, Kansas 66211**

August 1, 2020 to July 31, 2021

Plan Prepared by:

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Signature: _____



Plan Approved by:

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Chief Executive Officer

Signature: _____



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CONFIDENTIAL TRADE SECRET MATERIALS

The Affirmative Action Program (AAP) is the property of Hofer Wysocki Architects (HWA) and is not for distribution except on a need-to-know basis within HWA.

This AAP contains company confidential, trade secret and commercial information, which is subject to the provisions of 18 U.S.C. § 1905 and otherwise protected by law. 18 U.S.C. § 1905 prohibits the Office of Federal Contract Compliance Programs from voluntarily releasing this information pursuant to the Freedom of Information Act. In addition, exemptions 3 and 4 of the Freedom of Information Act protect information in this document from mandatory disclosure to Freedom of Information Act requesters.

Copies of this AAP and all related appendices, documents, and support data are made available on loan to the U.S. Government upon the request of the Government on the condition that the Government holds them totally confidential and not release copies to any persons whatsoever. This AAP and its appendices and other supporting documents contain much confidential information that may reveal, directly or indirectly, HWA's plans for business expansion or contraction and its capacity. HWA considers this AAP to be exempt from disclosure, reproduction, and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes: (1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. § 551 (b)(6); (2) confidential, commercial, or financial information, which is exempt from disclosure under 5 U.S.C. § 551(b)(4); (3) investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. § 551(b)(7)(C); and (4) matters specifically exempted from disclosure by statute, which are exempt from disclosure under 5 U.S.C. § 552(b)(3). Notice is hereby given of a request pursuant to 41 C.F.R. § 60-60.4(d) that portions of this program be kept confidential.

Thus, HWA wishes to make it clear that it does not consent to the release of any information whatsoever contained in this AAP under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, is considering breaching the conditions under which this AAP was loaned to the Government, or is considering a request for release of this Plan under the Freedom of Information Act, request is hereby made that the Government immediately notify the Chief Executive Officer of HWA, Mitchell Hofer, of any and all Freedom of Information Act requests received by the Government or any other contemplated release of this Plan by the Government that relates to information obtained by the Government from this program.

HWA further requests that everyone who has any contact with this AAP or its supporting appendices, documents, and other data, treat such information as totally confidential, and that no information or documents be released to any person whatsoever. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

INTRODUCTION

Hoefer Wysocki Architects (HWA) is located at 11460 Tomahawk Creek Parkway, Suite 400, Leawood, KS. In addition to the corporate office, the firm has an office in Dallas, TX. HWA was founded in 1996 and is a full-service architectural, planning and interior design firm. The focus of its design and planning services are in the areas of healthcare, commercial, government, judicial and public safety projects.

The firm has received the following recognition:

Finalist among small companies for Ingram magazine's Kansas City's Best Companies to Work For - 2011

Kansas City Chamber of Commerce Top 10 Small Business of the Year Finalist – 2005

Kansas City Area's 100 Fastest Growing Businesses – Ingrams Magazine

2002 – Number 37

2003 – Number 68

2004 – Number 67

Kansas City Area's Top Architectural Firms ranked by number of registered architects

2004 – Number 16

2005 – Number 20

Recent HWA projects awards include:

Gold Award – Healthcare Design – 2013

Air Force Postgraduate Dental School and Clinic

Mid-America Design Award (MADA)

Silver Award – Healthcare Design – 2010

Cass Regional Medical Center, Harrisonville, MO

IIDA Mid-America Design Award (MADA)

Silver Award – Government Design – 2010

Missouri River Courthouse, Great Falls, Montana

IIDA Mid-America Design Award (MADA)

Gold Award – Government Design – 2009

Fire Station 35, Kansas City, MO

IIDA Mid-America Design Award (MADA)

Silver Award in Restoration/Renovation Design – 2009

Tomahawk Ridge Community Center, Overland Park, KS

IIDA Mid-America Design Award (MADA)



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Equal Employment Opportunity/Affirmative Action Policy Statement

August 1, 2020

Federal and state laws prohibit employment discrimination. As Principal-In-Charge of Hoefer Wysocki, I am committed to the principles and practices of equal employment opportunity and reaffirm our intent to comply with federal, state, and local laws and regulations prohibiting discrimination on the basis of race, color, age, religion, sex, gender identity, transgender status, national origin, ancestry, disability, genetics, protected veteran status, or any other protected classes. Our intent is to ensure that personnel actions are administered in compliance with these laws and in conformance with our Affirmative Action Program (AAP). Personnel actions include, but are not limited to: employment, promotion, transfer, recruitment or recruitment advertising, layoff or termination, recall from layoffs, company-sponsored educational, social, and recreational programs, benefits, rates of pay or other forms of compensation, and training.

Christopher Andersen, our Equal Employment Opportunity (EEO) Officer, is responsible for the implementation and administration of the AAP. Tanya Wilson, Director of Human Resources, will be assisting the EEO officer. With the cooperation and assistance of appropriate staff and operating personnel, the EEO Officer will monitor the company's performance and report the results to me. Data may include outside hires, promotions, transfers, terminations, identification of problem areas and, if necessary, a recommended plan of action. Any employee who has a question regarding our AAP may discuss the matter with Christopher Andersen or Tanya Wilson.

The Affirmative Action Program for Individuals with Disabilities and Protected Veterans is available for review by any employee or applicant for employment during normal business hours by contacting Christopher Andersen or Tanya Wilson.

Discrimination on-premises or on-the-job will not be tolerated. Employees of, and applicants to, Hoefer Wysocki will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have filed a complaint, assisted in a review, investigation, or hearing, or have otherwise sought to obtain their legal rights related to any federal, state, or local law regarding equal employment opportunity. Personnel found guilty of violating this directive will be subject to discipline and possible termination.

I ask your continued support in attaining Hoefer Wysocki's objective of equal employment opportunity.

Mitchell Hoefer
CEO

CHAPTER 2

PROGRAM TERMINOLOGY AND DEFINITIONS

The terms "utilization analysis," "underutilization," and "problem areas," appearing in this Affirmative Action Program are terms used solely for the purpose of meeting the requirements of Executive Order 11246 and the regulations promulgated there under on inclusion in the affirmative action programs for government contractors. These terms have no legal or factual significance other than inclusion for the above reason, and under no circumstances constitute an admission of discrimination or a violation of the antidiscrimination laws, or the validity or applicability of the statistics that lead to its use.

Whenever the term "goal" is used, it is expressly intended that it should not be used to discriminate against any applicant or employee because of race, color, religion, sex, sexual orientation, gender identity, national origin, disability or protected veteran status as stated in Government regulations.

Descriptions of Race/Ethnic Classifications

- The category "**White**" includes persons having origins in any of the original peoples of Europe, North Africa or the Middle East, who are not of Hispanic origin.
- The category "**Black or African American**" includes persons having origins in any of the Black racial groups of Africa, who are not of Hispanic origin.
- The category "**Hispanic**" includes all persons of Mexican, Puerto Rican, Cuban, Central or South America or other Spanish cultures or origins, regardless of race.
- The category "**American Indian or Alaskan Native**" includes persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition. This category may also include individuals who identify as being "**Two or more**" race/ethnic groups.
- The category "**Asian or Pacific Islander**" includes persons having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

Descriptions of Job Categories

Executive/Senior Managers – 101

Individuals who plan, direct, and formulate policies, set strategy, and provide the overall direction of the organization for the development and delivery of products or services, within the parameters approved by the boards of directors or other governing bodies. These executives plan, direct, or coordinate activities with the support of subordinate executives and staff managers. These jobs often include chief executive officers, chief operating officers, chief financial officers, line of business heads, presidents or executive vice presidents of function areas or operating groups, chief information officers, etc.

First/Mid Managers – 102+

Individuals who serve as managers, other than those who serve as Executive/Senior Level Officials and Managers, including those who oversee and direct the delivery of products, services, or functions at group, regional, or divisional levels of organizations. These managers receive directions from the Executive/Senior Level management and typically lead major business units. They implement policies, programs, and directives of the executive/senior management through others. These positions may include middle management, plant managers, department managers, and superintendents and also includes those who report directly to middle managers, such as first-line managers, and brand and product managers.

Professionals - 200s

Professional occupations typically require bachelor and graduate degrees, and/or professional certification. In some instances, comparable experience may establish a person's qualifications. Examples of common positions in this category are accountants and auditors, airplane pilots and flight engineers, architects, artists, chemists, computer programmers, designers, dietitians, editors, engineers, lawyers, librarians, mathematicians, natural scientists, registered nurses, physical scientists, teachers, social scientists, doctors, and surveyors.

Technicians - 300s

Occupations requiring a combination of basic scientific knowledge and manual skill that can be obtained through about two (2) years of post high school education, such as is offered in many technical institutes and junior colleges, or through equivalent on-the-job training. Includes: computer programmers and operators, draft persons, engineering aides, junior engineers, mathematical aides, licensed practical or vocational nurses, photographers, radio operators, scientific assistants, surveyors, technical illustrators, technicians (medical, dental, electronics, physical sciences), police and fire sergeants, and kindred workers.

Sales - 400s

Sales occupations engage wholly or primarily in direct selling and may include advertising agents and salespersons, insurance agents and brokers, real estate agents and brokers, stock and bond salespersons, demonstrators, salespersons and sales clerks, grocery clerks, cashier clerks, and kindred workers.

Administrative Support - 500s

Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information, and other paper work required in an office, predominantly nonmanual, though some manual work not directly involved with altering or transporting the products is included. Examples of these jobs include bookkeepers, cashiers, collectors (bill and accounts), messengers, office machine operators, shipping and receiving clerks, stenographers, typists and secretaries, telegraph and telephone operators, court transcribers, hearing reporters, statistical clerks, dispatchers, license distributors, payroll clerks, and kindred workers.

Craft Workers - 600s

Skilled craft workers perform jobs that require special manual skill and thorough on-the-job training and experience or thorough apprenticeship or other formal training programs. Exercise considerable independent judgment and usually receive an extensive period of training. Includes: the building trades, hourly paid lead persons who are not members of management, mechanics and repair-persons, skilled machining occupations, compositors and typesetters, electricians, engravers, job setters (metal), motion picture projectionists, pattern and model makers, stationary engineers, tailors and tailoresses, heavy equipment operators, carpenters, and kindred workers.

Operatives - 700s

Workers who operate machine or processing equipment or perform other factory-type duties of intermediate skill level that can be mastered in a few weeks and require only limited training. Includes: apprentices (auto mechanics), plumbers, bricklayers, carpenters, electricians, mechanics, building trades, metal workers, machinists, printing trades, operatives, attendants (auto service and parking), blasters, chauffeurs, delivery persons, dressmakers, seamstresses (except factory), dryers, custodians, heaters (metal), laundry and dry cleaning operatives, milliners, miners, motor persons, oilers, greasers, etc. (except auto), painters (except construction and maintenance), photographic process workers, stationary firepersons, truck and tractor drivers, weavers (textiles), welders, flamecutters, and kindred workers.

Laborers - 800s

Laborers work in manual occupations, which generally require no special training. Perform elementary duties that may be learned in a few days and require the application of little or no independent judgment. Includes: garage workers, car washers and greasers, gardeners (except farm), groundskeepers, longshorepersons and stevedores, lumberpersons, craft persons, wood choppers, laborers performing lifting, digging, mixing, loading, and pulling operations, and kindred workers.

Service Workers - 900s

Occupations in which workers perform duties that result in or contribute to the comfort, convenience, hygiene, or safety for general public or that contributes to the upkeep and care of buildings, facilities, grounds, or public property. Workers in this group may operate machinery. Jobs in this category may include chauffeurs, laundry and dry-cleaning operatives, truck drivers, trash collectors, custodial personnel, gardeners and groundkeepers, construction laborers, attendants (hospital and other institutions), professional and personal services, counter and fountain workers, elevator operators, firepersons and fire protection, guards, watchpersons and doorkeepers, stewards, porters, waiters, and kindred workers.

CHAPTER 3

DISSEMINATION OF POLICY

HWA's equal employment opportunity/affirmative action policy is communicated to management, employees, applicants for employment and external sources in the following ways.

Internal Policy Dissemination

1. **Employee Handbook** - An equal employment opportunity policy statement is included in our Employee Handbook that is distributed to newly hired employees and is available on-line.
2. **Management Reports** – Reports on affirmative action-related activity (impact ratio analysis, progress toward affirmative action goals, and compensation) are reviewed with the Chief Executive Officer at least annually.
3. **Posters** - Required State and Federal EEO notices are posted at all locations.
4. **Company Policy Statement** - HWA has a current equal employment opportunity/affirmative action policy statement posted on appropriate bulletin boards. They are posted electronically as well.
5. **Management Training** – Education and/or training for managers and supervisors on non-discriminatory practices and HWA's AAP is conducted at least annually.
6. **Employee Commitments** - Annually, HWA will reaffirm its equal employment/affirmative action commitments to employees.

External Policy Dissemination

1. **Recruitment Sources** - Recruiting sources are advised of HWA's policy on non-discrimination on at least an annual basis.
2. **Recruitment Advertising** - The statement HWA is an equal opportunity employer and all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, protected veteran status, or any other legally protected characteristics, "EOE/Veterans/Disabled" or similar wording, is included in all recruitment advertising and job listings.
3. **Tag-Lines** - HWA's employment application, recruiting advertisements/listings, and career website page include appropriate tag-lines.
4. **Supplier Notification** - Vendors and suppliers will be notified regularly in writing of HWA's equal employment opportunity/affirmative action policy.

CHAPTER 4

RESPONSIBILITY FOR PLAN IMPLEMENTATION

HWA's Chief Executive Officer has overall responsibility to implement the Company equal employment opportunity policy and to ensure that equal employment opportunity and affirmative action receive the high level of priority that is due these activities.

Christopher Andersen has been designated as the Equal Employment Opportunity (EEO) Officer of the company and has the full support of the Chief Executive Officer and other top management in carrying out these duties. Tanya Wilson, Human Resources Director, will assist the EEO Officer.

The EEO Officer has the responsibility for overseeing the development and ensuring the effective implementation of HWA's AAP. These responsibilities include, but are not limited to the following:

1. Oversee the implementation of affirmative action programs, equal employment opportunity policy statements, and internal and external communication procedures.
2. Ensure an internal audit and reporting system is in place that:
 - a. Measures the effectiveness of HWA's program,
 - b. Determines the degree to which AAP goals and objectives are met, and
 - c. Identifies the need for remedial action.
3. Assist in the identification of affirmative action and/or equal opportunity problem areas.
4. Assist management in arriving at effective solutions to affirmative action and/or equal opportunity problems.
5. Provide assistance and information to managers and supervisors; including pertinent information from HWA's AAP to ensure that equal employment opportunity and affirmative action is understood and followed in personnel activities.
6. Serve as liaison with groups concerned with equal employment opportunities for minorities, women, disabled persons, and protected veterans.
7. Serve as an internal resource person on affirmative action-related activities; audit the contents of the bulletin boards and website to ensure compliance information is current and posted; inform management of equal employment and affirmative action developments, etc.
8. Provide information to the Chief Executive Officer, at least annually, on personnel activity, problem areas, and progress on action plans.
9. Maintain affirmative action-related documents appropriately in accordance with regulations and retention guidelines.

C. Supervisors' and Managers' Responsibilities

Supervisors and managers will be responsible for:

1. Complying with equal employment and affirmative action guidelines in personnel actions under their jurisdiction.
2. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives, when necessary.
3. Ensuring that members of protected groups are given opportunity for jobs, transfers, and promotions.
4. Preventing harassment of individuals.

CHAPTER 5

WORKFORCE, JOB GROUP/AVAILABILITY AND UTILIZATION ANALYSIS DISCUSSION

See the Appendix for the statistical portion of the plan. The Internal Workforce Analysis is in Appendix A-1. It shows the composition of HWA's workforce as of August 1, 2020. It is followed by department listings showing employee populations from the highest to lowest paid.

The Workforce Utilization and Availability Analysis are in Appendix A-2. In determining relevant labor market area, the following factors were considered:

- A. The racial, ethnic, and gender composition of the 5-year ACS data from the EEO Tabulation 2006-2010 (e.g. county, city) in which the facility is located.
- B. The geographic area in which prospective employees may reasonably be expected to commute to the facility by public or private transportation.
- C. The location of the residences of HWA's employees and applicants.

Analysis of one to two availability factors is also shown in this Appendix. Each of the factors is weighted, dependent upon its respective value. The value is based upon such factors as the typical recruiting source for the job group; whether the job is generally filled by promotion or hire; the level of skill, education, and/or experience required in the job; and the availability of on-the-job training.

Statistical information was obtained from the EEO Tabulation 2006-2010 (5-year ACS data) at <http://www.census.gov/people/eetabulation/data/eetables20062010.html>. External availability may be comprised of Kansas City MO/KS MSA, Dallas TX MSA, and US data utilized.

Placement Goals and Utilization Analysis are shown in Appendix A-3. It should be understood that these goals are not intended to operate as quotas or to require preferential treatment for any group based on gender or race/ethnicity. The purpose of the goals designated is to serve as a planning guide to be used for affirmative action to enable the organization to monitor its good faith efforts and, where applicable, to increase the percentage of minorities and females employed in the workforce. The placement goals are based upon information that was available at the time the AAP was developed.

Establishment of placement goals do not amount to an admission of impermissible conduct nor are they a finding of discrimination or a finding of a lack of good faith affirmative action efforts.

CHAPTER 6

IDENTIFICATION OF PROBLEM AREAS

HWA uses the internet applicant definition when determining “applicants”. Procedures are in place to track and capture applicant flow, including sex, race/ethnicity, protected veteran, and disability status.

HWA is notifying job service and other recruitment outreach sources of openings to ensure that jobs are consistently announced, and accurate records are maintained which can identify how many positions are listed with the various groups. HWA will also be looking for recruitment sources that can help attract additional qualified females, minorities, protected veterans, and individuals with disabilities.

Annually, HWA conducts impact ratio analysis as a review of its employment decisions. Hires are compared to applicants, and promotions and terminations are reviewed and analyzed as well. If adverse impact is found to exist, corrective action will be taken. Adverse impact was conducted on 2019/2020 plan year hires, promotions, and terminations. Groups were flagged if there was a difference of one or more between the expected and actual number of actions (e.g. hires) and the impact ratio (IRA) is less than 80%. The standard deviation provides an indication of the severity of the problem. A standard deviation of two or more is an indicator that bias or discrimination could be present.

HWA will look at its placement goals and whether or not the goals were met annually. As of August 1, 2019, HWA had 153 employees, 84 males (54.9%) and 69 females (45.1%). There were 25 minorities (16.3%). Based on the 80% rule, no underutilization existed and therefore no placement goals were established.

August 1, 2020 there were 160 employees; 90 males (56.3%) and 70 females (43.8%). There were 27 minorities (16.9%). Using the 80% rule, underutilization existed in 101 Exec/Sr Managers and 201 Professionals. Placement goals were established for females in 101 (18.9%) and minorities in 201 (16.9%). HWA will continue to act in good faith to affirmatively recruit women and minorities as opportunities occur.

HWA reviews its compensation by position at least annually. Pay is based on the job held, and typically is also impacted by experience required, tenure, and performance. The results of the impact ratio analysis, compensation review, and progress towards goals review are contained in separate reports.

CHAPTER 7

DEVELOPMENT & EXECUTION OF ACTION ORIENTED PROGRAMS

HWA has instituted action programs designed to eliminate specified problem areas and to help achieve affirmative action goals. These programs include:

1. Reviewing and standardizing position descriptions to ensure that they accurately reflect position functions.
2. Making position descriptions/worker specifications available to recruiting sources and all members of management involved in the recruiting, screening, selection and promotion processes.
3. Evaluating the total selection process to ensure freedom from bias and thus aid the attainment of goals and objectives. Currently, HWA:
 - a) Reviews job applications and other pre-employment forms to ensure that inquiries are job-related.
 - b) Evaluates the selection process to ensure that it is free from bias and does not hinder HWA's ability to attain its affirmative action goals.
 - c) Evaluates selection methods that may have a disparate impact on minorities or women to ensure that they are job-related and consistent with business necessity.
 - d) Educates personnel interviewing applicants on proper techniques, inquiries, documentation, and HWA's affirmative action objectives.
4. Using techniques to improve recruitment and increase the flow of minority and female applicants. HWA presently undertakes the following:
 - a) Includes the phrase "an equal opportunity employer and all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, protected veteran status, or any other legally protected characteristics", "EOE/Veterans/Disabled," or similar wording, in all recruitment advertising and job listings.
 - b) Disseminates information on job opportunities to job service(s) and other recruiting sources ensuring they know that HWA is an equal opportunity/affirmative action employer.
 - c) Encourages all employees, including women and minorities, to refer applicants.
 - d) Requests employment agencies refer qualified minorities and women, when utilizing their services.

5. Ensuring that minority and female employees are given equal opportunity for promotion. This is achieved by:
 - a) Posting promotional opportunities.
 - b) Administering an employee performance evaluation program designed to assist employees in meeting performance standards, in a non-discriminatory manner.
 - c) Evaluating requirements for promotion on job-related criteria and ensuring that minorities and women are not required to possess higher qualifications than others.
 - d) Offering remedial education, skills training, and tuition reimbursement programs, where appropriate, to assist employees in meeting performance standards and increasing skills and knowledge.

6. Making certain that facilities and company-sponsored social and recreational activities are desegregated. All employees are encouraged to participate.

CHAPTER 8

INTERNAL AUDITS AND REPORTS

As previously stated, the EEO Officer is responsible to implement the auditing and reporting system. HWA's audit and reporting system has been designed to:

- Measure the effectiveness of the program;
- Document personnel activities;
- Indicate those areas where remedial action is needed; and
- Determine the degree to which HWA's goals and objectives have been obtained.

As part of the process, the following activities are reviewed to ensure nondiscrimination and equal employment opportunity:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, and termination actions;
- Rates of pay by job title;
- Job descriptions, specifically mental and physical requirements;
- Leave policies and practices;
- Outreach activities and effectiveness; and
- Training efforts regarding equal employment and affirmative action.

The audit system will provide for the maintenance of the following records for a period of not less than two years.

1. Applicant tracking will occur to identify (at a minimum) the applicant's name, race, sex, date of application, position applied for, job group, referral source, and the action taken.
2. Summary of job offers, hires, promotions, layoffs, terminations by job group, sex, and minority group identification.
3. Summary data of applicant flow by identifying total applicants, total minorities, and total females.
4. Retention of employment applications, self-identification forms, and other recruitment-related documents.
5. Records pertaining to HWA's compensation system.
6. Records documenting affirmative action/equal employment opportunity related training.

The Partner/EEO Officer provides information at least annually to the Chief Executive Officer indicating HWA's efforts to achieve its AAP responsibilities. If problem areas arise, the situations will be reviewed and a plan of action developed.

CHAPTER 9

COMPLIANCE WITH SEX DISCRIMINATION GUIDELINES

The personnel policies and practices of HWA are designed and implemented in compliance with the sex discrimination guidelines and requirements. It is HWA's policy not to discriminate on the basis of sex.

Recruitment and Advertising:

1. Recruitment activities will actively seek out qualified candidates of both sexes for all jobs.
2. Advertisements will not express a sex preference, nor will ads be placed in any sex-segregated columns.

Job Policies and Practices:

1. Written personnel policies indicate that there shall be no discrimination against employees or applicants because of sex.
2. Employees of both sexes will have an equal opportunity to apply for any available job that he or she is qualified to perform.
3. In the area of insurance, pensions, welfare programs, and other similar fringe benefits, the resulting benefits are equal for both men and women.
4. Conditions of employment are the same for married and unmarried individuals, as well as for those with young children, regardless of sex.
5. The commencement and duration of leaves of absence, reinstatement, accrual of seniority, and other benefits and privileges will be applied to disability due to pregnancy or childbirth on the same terms as they are applied to other disabilities. Employment will not be denied due to pregnancy or childbirth.
6. There are no differences in the mandatory or optional retirement ages for men and women.
7. Disabilities caused or contributed to by pregnancy or childbirth will be treated in the same manner as disabilities caused or contributed to by other medical conditions.

Length of Service Calculations:

HWA's lengths of service provisions are the same for men and women and no separate methods for determining service eligibility for benefits and/or service plans will be maintained.

Wages:

1. Wages and salary schedules are based on job classifications and not related to or based on the sex of the employees.
2. Assignment to job classification is not based on the sex of the employees.

Training Programs:

Both men and women have equal access to all training programs.

Anti-Harassment:

The Equal Employment Opportunity Commission (EEOC) and the Office of Federal Contract Compliance Programs (OFCCP) have defined sexual harassment as: unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature when (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. HWA adheres to this definition.

1. HWA strongly disapproves of sexual harassment and will not condone it in any way. Appropriate action will be taken against any manager, supervisor, and/or employee who engages in such conduct.
2. HWA has an internal complaint mechanism accessible to all employees who feel they may have been discriminated against on the basis of sex.

HWA also prohibits harassment on the basis of disability, status as a protected veteran, and any other characteristics protected by law. As with sexual harassment, HWA will not condone harassment and will take appropriate action against any manager, supervisor, and/or employee who engages in such conduct.

HWA has an internal complaint mechanism accessible to all employees who feel they may have been discriminated against or harassed based on the basis of disability, status as a protected veteran, or by any other characteristic protected by law.

CHAPTER 10

MINORITIES AND WOMEN NOT CURRENTLY IN THE WORKFORCE

Minorities and women within our present work force will be advised of position vacancies when they occur through job postings and will be encouraged to apply for all jobs for which they are qualified and are interested.

Whenever appropriate, HWA will take reasonable efforts to assist in hiring minority and female applicants, which may include opening and/or advertising positions with:

Job Service – Dallas, Texas and Kansas Works

Career fairs

Employee Referrals

Employment and temp agencies and/or search firms

Glassdoor.com

HWA website

IMDiversity.com

Indeed.com

Job Boards

KS Vocational Rehabilitation

LinkedIn

Local colleges

Monster.com

Professional organizations

RecruitMilitary.com

Rehires

Technical publications

Vets Success

In addition to the recruitment sources above, HWA has participated with various organizations that support services for children and families. In addition to helping the community, it is possible that potential applicants may become more aware of HWA. The organizations include Olathe Health, University of Kansas Health, St Luke's, Marengo Hospital, Hannibal Regional Hospital, American Cancer Society, Juvenile Diabetes Research, Treads & Threads, DGB Webstore, Shawnee Mission Education Foundation, Christmas in October, Big Brothers Big Sisters, and Special Olympics.

CHAPTER 11

GUIDELINES ON DISCRIMINATION BECAUSE OF RELIGION AND NATIONAL ORIGIN

It is the policy of HWA to take affirmative action to ensure that applicants are employed without regard to their religion or national origin. Such actions include, but are not limited to the following: employment, promotion, demotion, transfer, recruitment or recruitment advertising, layoff, termination, rates of pay or other forms of compensation, and selection for training.

1. The policy concerning HWA's obligation to provide equal employment opportunity without regard to religion or national origin is communicated to all employees via employee handbook policy statement, the AAP and policy statement, and federal, state, and local employment posters.
2. Employees are informed at least annually of HWA's commitment to equal employment opportunity for all persons without regard to religion or national origin.
3. Recruiting sources have been informed of HWA's commitment to provide equal employment opportunity without regard to religion or national origin.