



# **2024 EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION PLAN**

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## **INTRODUCTION**

During the history of Northwestern Illinois Community Action Agency, the Agency has always complied with all Federal and State guidelines pertinent to Equal Employment Opportunity/Affirmative Action.

## **EQUAL OPPORTUNITY POLICY STATEMENT**

The Northwestern Illinois Community Action Agency hereby declares to uphold, defend, enforce, and advocate for all laws related to Equal Employment Opportunity including, but not limited to, the following:

- Title VI of the Civil Rights Act of 1964 – which prohibits discrimination in the participation in or benefits of program or activities receiving federal financial assistance on the basis of race, color, or national origin.
- Title VII of the Civil Rights Act of 1964 – which prohibits employment discrimination because of race, color, religion, sex, or national origin in all employment practices including hiring, firing, promotions, compensation, and other terms, privileges and conditions of employment.
- Title IX of the Education Amendments of 1972 – which prohibits discrimination in federally assisted education programs.
- The Equal Pay Act of 1963 - which covers all employees who are covered by the Fair Labor Standards Act. The Act forbids pay differentials on the basis of sex.
- The Age Discrimination Act of 1967 – which prohibits discrimination because of age against anyone 40 years of age and older.
- Federal Executive Order 11246 – which requires every contract with federal financial assistance to obtain a clause against discrimination because of race, color, religion, sex, or nation origin.
- Section 504 of the Rehabilitation Act of 1973 – which stipulates that no individual in the United States shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination on the basis of an impaired condition under any program or activity receiving federal financial assistance and requires government contractors to take affirmative action to hire and promote disabled individuals.
- Article I, sections 17,18 & 19 of the Illinois Constitution – which prohibits discrimination based on race, color, creed, national ancestry, handicap, and sex in the hiring and promotion practices of an employer.

- Administration of Aging Program Instruction AOA-PI-75-11 – which requires all grantees to develop Affirmative Action plans. Agencies, which are part of an “umbrella agency”, shall develop and implement an Affirmative Action plan for the single organizational unit on aging. Preference for hiring shall be given to qualified older persons (subject to requirements of merit employment systems.)
- Americans with Disabilities Act of July 26, 1990. Public Law 101-336 – prohibits discrimination against people with disabilities in employment, transportation, public accommodation, activities of state and local government, and telecommunications relay services.
- Americans with Disabilities Act Amendments Act of 2008 - expands the definition of a covered disability, offers greater protection to individuals with disabilities and makes redefining changes to broaden coverage under the Act.

In the area of employment practices, the Agency will not, directly or through contractual or other arrangements, subject an individual to discrimination on the grounds of race, color, national origin, creed, sex, age, physical disability, political affiliation, or beliefs in its employment practices under any program. These practices include recruitment or recruitment demotion or transfer, rate of pay or other forms of compensation and use of facilities. This prohibition applies not only where a primary objective is not to provide employment but where discrimination in employment practices might exclude individuals from participation in, denial of benefits to, or subject them to discrimination under any Agency program and such prohibition shall apply to the employment practices of this Agency or other persons subject to the regulations to the extent necessary to assure equality of opportunity to, and nondiscriminatory treatment of beneficiaries. The requirements applicable to construction employment under any program shall be those specified in or pursuant to Part III of Executive Order 11246 or any Executive Order which supersedes it.

The EEO/AA statement is published on all applications for employment in the Agency and on all documents relating to employee records.

Additionally, the Agency will make efforts to provide employment opportunities to minority persons, to include but not limited to: American Indians, Asians, African Americans, Hispanics, women, disabled individuals, and older persons in proportion to their incidence in the geographical area of the Agency’s jurisdiction and will take affirmative action when an analysis of employment practices indicates underemployment of the affected group(s) of individuals.

## **EQUAL OPPORTUNITY OFFICER**

Executive Director, is designated as the EO/AA Program Officer for Northwestern Illinois Community Action Agency.

## **AFFIRMATIVE ACTION PROGRAM**

### **EMPLOYMENT AND PROFESSIONAL SERVICES**

The Agency, in determining the type of services, financial aid, or other benefits or facilities which will be provided under any program, or the class of individuals to whom, or the situations in which such services, financial aid, other benefits, or facilities will be provided under or on such program, or the class of individuals to be afforded an opportunity to participate in any such program will not, directly or through contractual or other arrangements, utilize criteria or administrative methods which have the effect of subjecting individuals to discrimination because of their race, color, sex, age, national origin or physical disability or have the effect of substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, sex or national origin. In determining the site or location of facilities the Agency will not make selections which would have the purpose or effect of excluding or impairing individuals from, denying them the benefits of, or subjecting them to discrimination under any program on the grounds of race, color, sex, age national origin, or physical disability.

The enumeration of specific forms of prohibited discrimination within the subpart does not limit the generality of this subpart's prohibition. In administering a program in which the Agency may have previously discriminated against persons on the ground of race, color, sex, national origin, or physical disability, the Agency will take affirmative action to overcome the effects of prior discrimination. The Agency may take affirmative action to overcome the effects or conditions which result in limiting participation by persons of a particular race, color, sex, age, national origin, or physical disability.

The Agency will, furthermore, make efforts to provide employment opportunities to minority persons, women, handicapped individuals, and older persons in proportion to their incidence in the geographical area of the Agency's jurisdiction and will take affirmative action when an analysis of employment practices indicates underemployment of the effected group(s) of individuals.

The Agency will include minority owned and/or managed contractors, suppliers, and banks in its purchasing listings so that such contractors, suppliers, and banks might be included in requests for bids.

The Agency Board of Directors is comprised of three sectors: political, community, and client representation. Political and community organizations appoint representatives to our Board. In the area of representation on the Agency Board of Directors and Committees of the Agency, the Agency assures it will seek the appointment of minority representatives to such boards and committees in proportion to their numbers in the geographical jurisdiction of the Agency. The Agency will communicate areas of demographic underutilization on our board to the appointing political and community organizations.

In order to ensure non-discriminatory recruiting for Agency staff openings, the following implementation actions will be undertaken. Employment advertisements will be placed on the

Agency website, social media platforms and in the local newspaper articles, which serve the minority populations of the Agency's area. Job recruiting efforts will be made in cooperation with hiring organizations that serve minority populations. Referrals of qualified minority applicants will be sought by systematic contacts with minority and human relations organizations, leaders, and spokesmen to encourage referral of qualified applicants.

Through staff meetings and memoranda, present Agency staff will be encouraged to refer minority applicants as openings develop and all recruitment sources shall be advised that minority persons are being sought for consideration for any and all Agency openings. Finally, all job postings and advertisements shall carry the statement that the Agency is an "Equal Opportunity Employer."

Through staff meetings, as well as through personal contact, those Agency employees who are making hiring decisions will be advised that minority applicants will be considered for job openings without discrimination.

The Agency, through its programs, will sponsor, assist, and encourage minority employees, including youth, to enter sub-professional and professional training programs through such means as Head Start, CDA, training for teachers and aides, weatherization skills training, and other training sessions available. All Agency employees, including minority employees, shall be afforded the opportunity to upgrade their present skills and to increase their job potential through attendance at appropriate training and educational programs. This will be provided to the maximum extent of the Agency's resources. (See Personnel Policies of the Agency)

Within the Agency itself, all employment placements and promotions shall be non-discriminatory. Those employees who make placement and promotion decisions shall be advised of this policy on a regular basis by the EEO/AA Officer. Additionally, minority employees who have upgraded their job skills and potential shall be encouraged to apply for any and all staff positions desired and will be afforded equal consideration.

Rates of pay, fringe benefits, and employee working conditions shall be reviewed at least annually to assure that such rates of pay and other compensation and benefits are applied equally to employees with equivalent duties. Any inequities will be adjusted accordingly. No existing employee shall have any compensation reduced as a result of having been converted to an on-the-job status. (See Personnel Policies of the Agency)

In order to ensure non-discriminatory professional contracting for the Agency, area minority contractors or contractors with minority representation will be encouraged to submit proposals for such professional contract work. A list of such contractors will be assembled and updated with bid announcements to be provided to the appropriate contractors.

To ensure the effectiveness of the Agency's Affirmative Action/Equal Opportunity Program, the Agency's EEO Officer will follow through all implementation actions, and will monitor those in a position to be affected by the EEO/AA plan. The EEO/AA Officer will act as the Agency's grievance officer in matters regarding any discrimination complaint. Any changes or additions to the EEO/AA Program and/or to Agency actions will be the responsibility of the EEO Officer in

conjunction with the Executive Committee of the Board should such changes or additions be necessary to ensure the effectiveness of the Program.

The attachments include detailed employee, board member and client population statistics concerning EEO/AA.

For these attachments, it is seen that the Agency is rated well within the guidelines for Board representation, staffing patterns, and client population.

## **GUIDELINES FOR SUPPLIERS & BANKS**

Continued emphasis will be given to identifying all local business firms owned or operated by minority residents.

All program managers will be directed to review minority business listings and forward appropriate information to locally owned minority business firms for quotes and/or bids as required.

Currently, there are no banks operating in the service area owned by minority individuals. If the opportunity becomes available to conduct banking business with a minority owned bank, the Agency will take appropriate action to establish an explicit banking policy to include the bank of depository.

In the future, all contracts awarded by the Agency will be given consideration to minority owned businesses.

## **GUIDELINES FOR CLIENTS**

NICAA will continue to actively recruit minority clients through the process as outlined below. At a minimum these described actions will be followed and do not in any way limit the actions that can be taken to best serve the minorities of the service area.

1. Actively recruit minority clients in the Agency's service area by taking such steps as:
  - Placing notices of available services on NICAA website, social media platforms and in local newspapers which serve the minority population and total service area.
  - Providing active outreach efforts in neighborhoods.
  - Maintaining contact with minority and human relations organizations leaders and spokesmen to encourage referral of minority clients.
  - Handing out information booklets on the Agency's programs within neighborhoods.
  - Having available information on the Agency at other social service offices and locations.
  - Providing press releases at least twice annually offering assistance regarding Agency programs.

- Request assistance from minority board members for referrals and contacts.
- 2. The Agency resolves to sustain our efforts of providing nondiscriminatory service through the following:
  - Instructing the staff who make client contacts that minority applicants for the Agency's services are to be considered without discrimination.
  - Comparing the types and extent of services currently being provided to the Agency's minority and non-minority clients and adjusting for any inequities found.
  - Utilize Google translation services to ensure members of the public who have a disability or limited English proficiency to assist in enrollment of our services, programs, and activities.

## **DISCRIMINATION COMPLAINT INVESTIGATION POLICY**

NICAA is committed to a policy of non-discrimination through the resolution of employee and client complaints of alleged discrimination. The following procedure will provide an internal avenue to resolve complaints of alleged discrimination at the lowest organizational level, reducing the delay and expense of a prolonged formal complaint process.

### **PROCEDURES**

Complainants will be asked to provide a written description of their complaint to the EO/AA Officer. The attached Discrimination Form may be used.

- Intake Screening: Upon receipt of the written complaint, the EO/AA officer shall review the complaint to determine the validity and thoroughness of the information submitted. The complainant will be promptly notified if further information or documentation is needed to support the charge.
- Investigation: the EO/AA Officer shall initiate a thorough investigation of the allegations of discrimination cited in the complaint. The investigation will entail the verification of information with the immediate supervisor, staff, and witnesses to the alleged discriminatory action.
- Investigation Findings: At the conclusion of the investigation, if there exists reasonable cause to indicate that discrimination may have occurred, the EO/AA officer will submit a written report to the Program Director with findings and recommendations to resolve the complaint. Conciliation efforts shall be initiated to seek an equitable resolution of the complaint.
- Conciliation Efforts: The EO/AA Officer shall conduct and coordinate efforts by conferring with parties in an attempt to secure an agreement. If the complaint cannot be satisfactorily resolved at this level, the EO/AA Officer shall document the efforts made to resolve the complaint and provide written explanation of the reasons why the complaint was not able to be resolved.



The findings, conciliation efforts, and proposed agreement shall be forwarded to the Board President for review and further determination.

All documentation will be kept by the EO/AA Officer and in the complainant’s file for at least three years.

## NICAA VOLUNTEERS & BOARD MEMBERS

<b>Volunteers and Board Members</b>						
<b>Total Population In Area Served:</b>		<b>66,812</b>				
<b>Total Number of Volunteers &amp; Board</b>		<b>12</b>				
#1	#2	#3	#4			
	Estimated Number and Percent of Persons in Service Area	Number and Percent of Persons Currently Serving as Volunteers, Board Members and/or Advisory Committee	Number and Percentage Difference (consistutes agency's AA objective for the next year)			
<u><b>Demographic Groups</b></u>	<u><b>#</b></u>	<u><b>%</b></u>	<u><b>#</b></u>	<u><b>%</b></u>	<u><b>#</b></u>	<u><b>%</b></u>
Sex: Male	33,097	49.5%	3	25.0%	3	24.54%
Female	33,715	50.5%	9	75.0%	-3	-24.54%
Age: Under 18	13,865	20.8%	0	0.0%	2	20.75%
18-64	36,419	54.5%	7	58.3%	0	-3.82%
65 + over	16,528	24.7%	5	41.7%	-2	-16.93%
Race: White	58,986	88.3%	9	75.0%	2	13.29%
Black or African American	4,359	6.5%	1	8.3%	0	-1.81%
American Indian and Alaska Native	138	0.2%	0	0.0%	0	0.21%
Asian	454	0.7%	0	0.0%	0	0.68%
Native Hawaiian or Other Pacific Islander	2	0.0%	0	0.0%	0	0.00%
Other/2 or more races	2,632	3.9%	2	16.7%	-2	-12.73%
Ethnicity: Hispanic or Latino	2,653	4.0%	0	0.0%	0	3.97%
Disabled	10,549	15.8%	0	0.0%	2	15.79%

# NICAA CLIENTS

## Northwestern Illinois Community Action Agency

### Clients

Poverty Population In Area Served: **8,167**  
 Total Number of Clients: **4,900**                      **8167**

	#1	#2		#3		#4	
		Estimated Number and Percent of Income Eligible Persons in Service Area		Number and Percent of Persons Currently Served by the Agency		Number and Percentage Difference (consistutes agency's AA objective for the next year)	
<u>Demographic Groups</u>	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>	
Sex: Male	3,690	45.2%	2,063	42.1%	151	3.08%	
Female	4,477	54.8%	2,809	57.3%	-123	-2.51%	
Age: Under 18	853	10.4%	1,871	38.2%	-1359	-27.74%	
18-64	1,560	19.1%	2,099	42.8%	-1163	-23.74%	
65 + over	397	4.9%	930	19.0%	-692	-14.12%	
Race: White	2,744	33.6%	2,786	56.9%	-1140	-23.26%	
Black or African American	26	0.3%	1,545	31.5%	-1529	-31.21%	
American Indian and Alaska Native	0	0.0%	0	0.0%	0	0.00%	
Asian	0	0.0%	13	0.3%	-13	-0.27%	
Native Hawaiian or Other Pacific Islander	0	0.0%	2	0.0%	-2	-0.04%	
Other/2 or more races	75	0.9%	0	0.0%	45	0.92%	
Ethnicity: Hispanic or Latino	78	1.0%	217	4.4%	-170	-3.47%	
Disabled	982	12.0%	982	20.0%	-393	-8.02%	

\* Sex Undeclared

# NICAA EMPLOYEES

## Northwestern Illinois Community Action Agency

### Employment and Professional Services

Total Labor Force In Area Served: 34,130  
 Labor Force in Area Served 20-64\*: 29,384  
 Total Number of Employees: 69

	#1		#2		#3		#4	
			Estimated Number and Percent of Persons in Labor Force in Service Area		Number and Percent of Persons Currently Employed by the Agency		Number and Percentage Difference (consistutes agency's AA objective for the next year)	
<u>Demographic Groups</u>	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>
Sex: Male	15,155	51.6%	35	50.7%	1	0.85%		
Female	14,222	48.4%	18	26.1%	15	22.31%		
Age: 16-19	1,656	4.9%	0	0.0%	3	4.85%		
20-64	29,384	86.1%	45	65.2%	14	20.88%		
65 + over	3,072	9.0%	7	10.1%	-1	-1.14%		
Race: White	30,927	90.6%	35	50.7%	28	39.89%		
Black or African American	2,325	6.8%	12	17.4%	-7	-10.58%		
American Indian and Alaska Native	59	0.2%	0	0.0%	0	0.17%		
Asian	255	0.7%	0	0.0%	1	0.75%		
Native Hawaiian or Other Pacific Islander	12	0.0%	1	1.4%	-1	-1.41%		
Other/2 or more races	535	1.6%	2	2.9%	-1	-1.33%		
Ethnicity: Hispanic or Latino	1,082	3.2%	2	2.9%	0	0.27%		
Disabled	1,703	5.8%	1	1.4%	3	4.35%		

\*Census Data for Sex and Disability Status only captures age range 20-64

## DISCRIMINATION COMPLAINT FORM

*Please return to: EEO/Affirmative Action Officer*

<b>1. Name:</b>		
Home Address:		
Phone:		
<b>2. Currently employed by the agency?</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>3. If Employed by NICAA, indicate your present job title, status, and length of service in your current title:</b>		
Job Title:		
Current Status:	<input type="checkbox"/> Employed	<input type="checkbox"/> Not Employed
Current Title		
<b>4. Date of alleged discriminatory practice:</b>		
<b>5. Basis of the alleged discriminatory practice:</b>		
<input type="checkbox"/> Sexual Orientation	<input type="checkbox"/> Transgender Status	<input type="checkbox"/> Race/Color
<input type="checkbox"/> Ancestry	<input type="checkbox"/> Disability	<input type="checkbox"/> Retaliation
<input type="checkbox"/> Sex	<input type="checkbox"/> Religion	<input type="checkbox"/> Age
<input type="checkbox"/> National Origin	<input type="checkbox"/> Other (please specify):	
<b>6. The discrimination occurred in connection with:</b>		
<input type="checkbox"/> Interview	<input type="checkbox"/> Hiring Selection	<input type="checkbox"/> Promotion
<input type="checkbox"/> Disciplinary Action	<input type="checkbox"/> Compensation	<input type="checkbox"/> Lay Off
<input type="checkbox"/> Training Opportunity	<input type="checkbox"/> Services Received	<input type="checkbox"/> Customer Care
<input type="checkbox"/> Other (please specify):		
<b>7. The facts of the alleged discriminatory practice are:</b>		

8. Name(s), Title(s), Work Location(s) and Telephone Number(s) of Person(s) who you believe discriminated against you:

8. Please supply supporting evidence to document the basis for the discriminatory practice you are claiming, as indicated in your response to Number 5 of the form.

9. Please supply supporting evidence to document the basis for the discriminatory practice you are claiming, as indicated in your response to Number 5 of the form.

I have attached supporting evidence:  Yes  No If yes, describe attachments below:

10. Have you made an effort to resolve the discrimination through the supervisor, the grievance procedure or with any public or private organization?

Yes  No If yes, please explain, indication the outcome of the efforts below:

**Complainant's Signature:**

**Date:**

**EEO/AA/ADA Officer's  
Signature:**

**Date:**