



Steps For Change

Equal Employment Opportunity

Affirmative Action Plan for Veterans and Individuals with Disabilities

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I. Purpose of the Affirmative Action Plan for Protected Veterans and Individuals with Disabilities

Veterans [41.CFR 60-300.5(a)] Individuals with Disabilities [41 CFR 60.741.5(a)]

Purpose

The Rehabilitation Act of 1973 (Section 503) requires that government contractors take affirmative action to employ and advance in employment, qualified individuals with a disability.

The Jobs for Veterans Act requires government contractors to take affirmative action to employ and advance in employment qualified disabled veterans, recently separated veterans, other protected veterans, and Armed Forces service medal veterans. The revised Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) regulations, 41 CFR Part 60-300, effective March 24, 2014, rescind 41 CFR Part 60-250. It also renames the “other protected veteran” category “active duty wartime or campaign badge veteran.” In addition, the final regulation imposes for the first-time hiring benchmarks for protected veterans; collection of certain data metrics for quantitative comparison; a pre-offer invitation to self-identify as a protected veteran; and expanded requirements for incorporation of the EEO clause by reference.

Steps For Change’s Affirmative Action Program for individuals with disabilities and protected veterans is intended to be a vehicle by which Steps For Change ensures that its Equal Employment Opportunity Policy is translated into Equal Opportunity action to employ and advance in employment qualified individuals with disabilities, and protected veterans. It has been and will continue to be the policy of Steps For Change to seek and employ qualified personnel, and to provide equal employment opportunities for all applicants and employees in recruiting, hiring, training, and promotion. To achieve this goal, we are dedicated to take affirmative action to employ and advance in employment, qualified disabled individuals and protected veterans.

Our objective in adopting this Affirmative Action Program is the selection of qualified disabled individuals and protected veterans in all levels of job classification. In this connection, the Program contains specific and results-oriented procedures to which the Steps For Change has committed itself to apply every good faith effort. The following material outlines these procedures and establishes responsibilities for their success.

II. Definitions

Section 503 of the Rehabilitation Act of 1973, as amended, defines "DISABILITY" for the purposes of the Act and this Program as:

1. A physical or mental impairment which substantially limits one or more major life activities of such individual;
2. A record of such an impairment; or
3. Being regarded as having such an impairment.

VEVRAA, defines a "DISABLED VETERAN" for the purposes of the Act and this Program as any person who is:

1. A veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or
2. A person who was discharged or released from active duty because of a service-connected disability.

The following definitions, in accordance with (41 C.F.R. §60-741.2 AND 41 C.F.R. §60-300.2), should be used when classifying an individual with a disability and/or a protected veteran for the purposes of the Affirmative Action Program:

1. "QUALIFIED INDIVIDUAL WITH A DISABILITY" is defined as an individual with a disability (see definition above) who satisfies the requisite skill, experience, education, and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.
2. "PROTECTED VETERAN" means a disabled veteran; active duty wartime or campaign badge veteran; recently separated veteran; or armed forces service medal veteran.
3. "QUALIFIED DISABLED VETERAN" means a disabled veteran (see definition above) who has the ability to perform the essential functions of the employment position with or without reasonable accommodation.
4. "ACTIVE DUTY WARTIME OR CAMPAIGN BADGE VETERAN" means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.
5. "RECENTLY SEPARATED VETERAN" means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval or air service.
6. "ARMED FORCES SERVICE MEDAL VETERAN" means any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209).

III. Applicability of the Affirmative Action Program

1. The Affirmative Action Program will be reviewed and updated on an annual basis.
2. Steps For Change has invited all applicants, at the time that they apply, and employees who believe themselves covered by Section 503 of the Rehabilitation Act of 1973 and/or Jobs for Veterans Act/VEVRAA who wish to benefit under the Affirmative Action Program to identify themselves.

Additionally, we invite our employees to identify as to whether they are a qualified disabled individual, no less frequently than once every fifth year. We remind employees at least once in between the five year intervals that they are free to update or change their disability status at any time by self-identifying through iSolved, Step For Change's online employee self-service website. Copies of Steps's For Change's invitations to self-identify are in section VII Resources.

Steps For Change maintains a separate file on individuals who have self-identified, and the information contained therein is used only in accordance with the Rehabilitation Act, the Jobs for Veterans Act, VEVRAA and their implementing regulations.

3. The Affirmative Action Program is available for inspection to any employee or applicant for employment Monday through Friday during the normal business hours on the MDrive and in the Program Administrator's, Tracy Mitchell, office (6040 Earle Brown Drive, Suite 420, Brooklyn Center, Minnesota 55430). Tracy Mitchell can also be contacted at 612-865-1413

IV. Reaffirmation of the Equal Employment Opportunity Policy

Steps For Change is dedicated to the achievement of equality of opportunity for all of its employees and applicants for employment. In this connection, the policy requires at least the following:

1. Recruit, hire, train, and promote qualified persons in all job titles, and ensure that all other personnel actions are administered, without regard to race, color, religion, sex, national origin, disability, status as a protected veteran.
2. Base decisions on employment so as to further the principle of equal employment opportunity.
3. Ensure that promotion and other employment decisions are in accord with principles of equal employment opportunity by imposing only valid job requirements for employment opportunities and basing all employment decisions only on those valid job requirements, which do not unnecessarily screen out individuals with disabilities or protected veterans.
4. Ensure that all personnel actions such as compensation, benefits, transfers, layoffs, return from layoff, Steps For Change sponsored training, education, tuition assistance, social and recreational programs will be administered without regard to race, color, religion, sex or

national origin, disability, status as a disabled veteran, recently separated veteran, active duty wartime or campaign badge veteran, or Armed Forces service medal veteran.

Employees and applicants are protected from harassment, threats, coercion, intimidation, interference and/or discrimination for filing a complaint, assisting in an investigation or opposing any practice made unlawful under Executive Order 11246, the Jobs for Veterans Act, the Rehabilitation Act or their implementing regulations.

V. Affirmative Action Policy, Practices and Procedures

General Policy

Pursuant to Section 503 of the Rehabilitation Act of 1973, and the Jobs for Veterans Act/VEVRAA, Steps for Change has committed not to discriminate on the basis of physical or mental disability, or status as a protected veteran, and Steps For Change has committed to take affirmative action to employ and advance in employment qualified individuals with disabilities, and protected veterans at all levels of employment. Such action shall apply to all employment practices.

Consideration of Qualifications

Steps For Change periodically reviews all personnel processes to ensure the careful, thorough, and systematic consideration of the job qualifications of applicants and employees who are known to be individuals with disabilities, or protected veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. Military records are used on a non-discriminating basis: i.e., in determining the qualifications of a covered veteran, Steps For Change considers only that portion of the military record, including discharge papers, relevant to the specific job qualifications for which the veteran is being considered. Steps For Change periodically reviews its personnel processes to ensure these processes do not stereotype individuals with disabilities or covered veterans in a manner that limits their access to all jobs for which they are qualified. Steps For Change will annually review its personnel processes and make any necessary modifications to ensure that the obligations set forth in this paragraph will be carried out on an ongoing basis. Furthermore, Steps For Change will maintain a record of all known protected veterans or qualified individuals with disabilities who are considered for job openings, promotions or training opportunities; identify the position to which they were hired or promoted or the training they received and identify any accommodation that made it possible to place the individual in the job or the training program, if applicable. If Steps For Change selects someone other than such protected veterans or qualified individuals with disabilities for a particular position or training program, Steps For Change will ensure that the selection is based on valid, non-discriminatory reasons.

Physical and Mental Qualifications

All jobs requirements are periodically reviewed by the Program Administrator to ensure they are job-related and consistent with business necessity and the safe performance of the job. Whenever

Steps For Change inquiries about an applicant's or employee's physical or mental condition or conducts a medical examination of an employee or applicant prior to employment, information obtained as a result will be collected and maintained on separate forms and in separate medical files apart from general personnel files and will be kept confidential except as otherwise provided by applicable regulations and the Americans with Disabilities Act. Medical information obtained through medical inquiries or examinations of employees or applicants shall not be used to discriminate against qualified individuals with a disability or disabled veterans on the basis of disability.

Reasonable Accommodation to Physical and Mental Limitations of Employees

Steps For Change will make a reasonable accommodation to the known physical and mental limitations of a qualified employee or applicant with disabilities, or a disabled veteran, provided such accommodation does not result in an undue hardship to the operation of the Steps For Change business. If an employee who is known to be an individual with a disability or a disabled veteran is having significant difficulty performing his or her job, and it is reasonable to conclude that the performance problem may be related to the known disability, Steps For Change will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds that it is so related, Steps For Change will confidentially inquire whether the employee is in need of a reasonable accommodation. If a requested accommodation would cause undue hardship to Steps for Change, the disabled individual or veteran will be given the option of providing the accommodation himself or herself, or paying for the portion of the expense that constitutes an undue hardship. Additionally, if the requested accommodation would be an undue hardship in the disabled individual or veteran's current position, Steps For Change may consider re-assigning the person to a vacant position.

Harassment

Steps For Change will not tolerate any harassment of individuals with disabilities or protected veterans and will take immediate action, where appropriate, in response to complaints or known violations of this policy. Harassment is defined as any verbal or physical conduct designed to intimidate, threaten, or coerce a co-worker, employee, or any other individual working on behalf of Steps For Change. Verbal insults that, in the affected individual's opinion, impair their ability to perform their job are included in the definition of harassment.

Verbal harassment includes comments that are offensive or unwelcome regarding a person's disability or protected veteran status, including epithets, slurs and negative stereotyping.

Nonverbal harassment includes display, discussion or distribution of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of disability or protected veteran status.

All employees, regardless of their positions, must comply with this policy and take necessary measures to ensure that harassment does not occur. Proper disciplinary action will be taken against violators of this policy. This discipline will vary depending on the severity of the offense, up to and including termination of employment. Any individual with a disability or protected veteran who feels harassed must initiate the complaint process by filing a complaint with the Program Administrator.

Compensation

In offering employment or promotions to individuals with disabilities, and protected veterans, Steps For Change will not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source.

Outreach, Positive Recruitment, and External Dissemination of the Policy

Steps For Change has reviewed its employment practices to determine whether its personnel programs provide the required affirmative action for employment and advancement of qualified individuals with disabilities, and protected veterans. Based on the findings of this review, Steps For Change has undertaken appropriate outreach and positive recruitment activities, including the following:

1. Periodic audits are conducted to ensure that the Affirmative Action Program is being fully implemented.
2. Steps For Change's Policy of Affirmative Action is disseminated to all present employees, new hires, and applicants for employment.
3. Where appropriate, a viable program of affirmative recruitment action is being maintained with recruiting sources and educational institutions that participate in training of persons with disabilities, and protected veterans.
4. Meaningful contacts are maintained with appropriate social service organizations in order to obtain advice, technical assistance and referral of potential employees.
5. Steps For Change periodically reviews employment records to determine the availability of promotable and transferable known qualified individuals with disabilities, and protected veterans presently employed, and to determine whether their present and potential skills are being fully utilized or developed.
6. Help-wanted and promotional advertising indicate that Steps For Change is an equal opportunity employer.
7. Vendors and suppliers are notified of relevant obligations under the Rehabilitation Act of 1973 and the Jobs for Veterans Act/VEVRAA, utilizing both the EEO clause in contracts/subcontracts and also annual notification letters.
8. Steps For Change will consider all qualified individuals with disabilities and all and protected veterans currently in the work force having requisite skills who can be recruited through affirmative action measures.
9. In making hiring decisions, Steps For Change will consider applicants who are known individuals with disabilities, disabled veterans, recently separated veterans, Active Duty war-time or Campaign Badge veterans, or Armed Forces service medal veterans for all

available positions for which they may be qualified when the position(s) applied for is (are) available.

Internal Dissemination of Policy

1. The EEO Policy is available to all employees and applicants online and is reviewed during new employee orientation.
2. Meetings are conducted with management groups, as well as other employees, to achieve awareness and understanding of the Steps For Change equal opportunity obligations and Affirmative Action Program.
3. A statement of Steps For Change's EEO policy is disseminated, annually, and is accessible on the M Drive for employees. Applicants will be made aware of the EEO statement on the Steps For Change job posting. Steps For Change takes special steps to ensure that applicants and employees who are known to be individuals with disabilities or disabled veterans are informed of the contents of the EEO policy.
4. Supervisory and management staff are informed of Steps For Change's affirmative action policies regarding individuals with disabilities and are advised how to properly respond to an employee who self-identifies as an individual with a disability under this Plan.
5. A "Voluntary Applicant Disability Self-Identification Form" has recently been revised to meet the requirements of 41 CFR 60-741.42(a) and is offered to every applicant prior to making any offer of employment. This invitation notifies applicants of our obligation to take affirmative action to employ and advance in employment individuals with disabilities.
6. A voluntary post-offer invitation to self-identify disability status form is provided to every new hire before he or she begins their job duties. New hire employees have the ability to log into iSolved and utilize the new hire employee portal and access the self-identification forms, which allows them to self-identify or update their disability status at any time. This invitation will also notify employees of our obligation to take affirmative action to employ and advance in employment individuals with disabilities.
7. The Affirmative Action Plan for Individuals with Disabilities is available for inspection upon request by any employee or applicant during normal business hours in the office of the Program Administrator
8. The Program Administrator works closely with the Executive Director to ensure understanding of affirmative action and equal opportunity as those apply to individuals with disabilities.

Responsibility for Implementation

41 CFR § 60-741.44(i)

Tracy Mitchell, Program Administrator, serves as equal employment opportunity officer for Steps For Change and has the full support of the Executive Director. Mrs. Mitchell is responsible for implementing, monitoring, and administering the affirmative action program for individuals with disabilities.

A. The Equal Employment Opportunity Officer will:

- Develop policy statements, affirmative action programs, and internal and external communication techniques, including discussions with managers, supervisors and employees, to ensure the Steps For Change policies are followed.
- Identify problem areas in the implementation of the affirmative action program in conjunction with administrators and management and develop solutions.
- Maintain an audit and reporting system to monitor the progress of the program.
- Serve as liaison between Steps for Change and enforcement agencies, minority, women and/or community action groups, and veteran and disabled service organizations.
- Keep Steps For Change staff informed of the latest developments in the affirmative action area.
- Conduct regular discussions with managers, supervisors, and employees to ensure that the Steps For Change EEO/AAP policies are being followed.
- Encourage supervisors to arrange for career counseling as requested by known individuals with disabilities.
- Work with the Steps For Change Executive Director to ensure that mechanisms are in place so that supervisors and managers understand that they are accountable for helping Steps For Change meet affirmative action goals.

B. Other managers, administrators and supervisors are responsible to implement the Affirmative Action Program within their areas of responsibility. This includes monitoring hiring and promotion practices, identifying problem areas, and taking other action as outlined in this Plan. In addition, line managers will arrange career counseling for qualified protected veterans when requested. Department managers and supervisors are responsible for maintaining a harassment-free environment. Employees who are protected veterans or individuals with disabilities should notify their supervisor immediately if they believe they are being harassed because of their status as an individual with a disability or a protected veteran.

Development and Execution of Affirmative Action Programs

1. Job qualification requirements are periodically reviewed with all members of management.
2. Steps For Change has evaluated the total selection process, including training and promotion, to ensure freedom from stereotyping protected veterans and individuals with disabilities in a manner that limits their access to all jobs for which they are qualified.
3. Whenever possible, individuals with disabilities and employees who are protected veterans will be made available for participation in employee appreciation events, employee trainings, and related activities in the community.

Training

Steps For Change provides training for all management-level personnel on related processes under this Affirmative Action Program to ensure that this program is fully implemented. In addition, qualified individuals with disabilities, and protected veterans are given equal access to all developmental trainings designed to enhance an employee's ability to have equal access to promotional opportunities.

Data Collection - Veterans

On a yearly basis, Steps For Change collects and maintains the following information:

- The number of applicants who self-identified as protected veterans or are otherwise known to be protected veterans;
- The total number of job openings and total number of jobs filled;
- The total number of applicants for all jobs;
- The number of protected veteran applicants hired; and
- The total number of applicants hired.

These records are retained for three years and are collected and maintained for internal purposes only, in accordance with federal regulations, and are not made available to the public.

Hiring Benchmark - Veterans

Steps For Change has set an annual hiring benchmark of 6.9% for protected veterans. This benchmark is based on the national percentage of protected veterans in the civilian labor force, according to the data published annually by the Office of Federal Contract Compliance Programs (OFCCP) and will be measured across the entire workforce.

Data Collection – Individuals with Disabilities

On a yearly basis, the following data is being collected for each job group and an assessment under the revised Section 503 regulations will be made at the end of each plan year:

- Total number of applicants who self-identify as individuals with disabilities or who are otherwise known individuals with disabilities;
- Total number of job openings;
- Total number of jobs filled;
- Total number of applicants for all jobs;

- Number of applicants with disabilities hired;
- Total number of applicants hired.

Utilization Goal for Individuals with Disabilities

Steps For Change is collecting recruitment and hire data for individuals with disabilities. This data will be used to evaluate the recruitment and representation of individuals with disabilities in each job group within Steps For Change workforce. An annual assessment will be made as to whether Steps For Change's efforts have been successful in attaining the Office of Federal Contract Compliance Program's (OFCCP) 7% utilization goal for the employment of qualified individuals with disabilities in each job group. This utilization goal is not a rigid and inflexible quota which Steps For Change must meet, nor is it intended to represent a ceiling or floor for the recruitment of qualified individuals with disabilities.

Audit of Program Effectiveness

Steps For Change conducts periodic audits of its Affirmative Action Program to ensure that its objectives are being met. Steps For Change utilizes several data metrics to measure the effectiveness of the AA program. These metrics help to determine the degree to which the contractor's general objectives have been obtained, as well as measurement of compliance with specific AAP obligations. Steps for Change reviews the extent to which known protected veterans had the opportunity to participate in Steps For Change's educational, training, recreational and social activities, to ensure equal opportunity. This audit helps to identify any areas where remedial action may be needed in order for the program to be as effective as possible. Managers will be advised on the results of the AA programs, problem areas, steps to correct problems or overcome impediments, and recommendations for improving the success of the program. Information about and results of the audit process are documented, and this documentation is retained for three years.

Outreach Assessment

In addition to the audit of program effectiveness, Steps For Change also conducts an annual assessment of the effectiveness of its external outreach and recruitment efforts of veterans and individuals with disabilities. Each year, Steps For Change documents its assessment, including the criteria utilized in its evaluation, and its conclusion as to whether or not its efforts were successful. If Steps For Change determines its efforts were unsuccessful, it will implement alternative methods to fulfill its obligations. All records pertaining to this assessment will be maintained for three years.

VI. Equal Opportunity Clause Disabled (41 C.F.R. §60-741.5) Veterans (41 C.F.R. §60-300.5)

Steps For Change has included the equal opportunity clause for protected veterans and individuals with disabilities in each of its covered contracts, subcontracts, purchase orders and leases. The affirmative action clauses will also be included in modifications, renewals or extensions if not included in the original.

VII. Complaint Procedures

Steps For Change has established an internal complaint procedure for the purpose of handling the complaints of individuals with disabilities and covered veteran employees.

When a complaint is filed by an employee of Steps For Change or by an applicant for employment with Steps For C, the complaint is investigated in a timely manner by the Program Administrator and Executive Director. When the investigation is complete, the merits of the complaint are reviewed with the affected employee(s). When appropriate, remedial action is taken.

VII Resources

- i. VOLUNTARY SELF IDENTIFICATION OF DISABILITY
[HTTPS://WWW.DOL.GOV/OFCCP/REGS/COMPLIANCE/SEC503/SELF_ID_FORMS/VOLUNTARYSELF-ID_CC-305_ENG_JRF_QA_508C.PDF](https://www.dol.gov/ofccp/regs/compliance/sec503/self_id_forms/voluntaryself-id_cc-305_eng_jrf_qa_508c.pdf)