

Michigan State Housing Development Authority
State Historic Preservation Office

MHRP

TABLE OF CONTENTS

		Page
I:	Introduction	2
II:	Definitions	2
III:	What Must Be Submitted With Application	3
IV:	Services, Activities, and Programs	3
V:	Equal Opportunity in Employment	4
VI:	Funding Approval	5

Appendices		
W:	Work Force Status Report	7
X:	Affirmation of Equal Opportunity	10
Y:	Work Force Analysis	11
Z:	Equal Opportunity Plan	12

CIVIL RIGHTS COMPLIANCE REQUIREMENTS

Introduction

These procedures are issued under the authority of Title VI of the 1964 Federal Civil Rights Act, and the State of Michigan Executive Directive 1979-4. It is the policy of the State of Michigan to afford all Michigan citizens full and equal employment benefits provided by federal- and state-supported programs and services, without discrimination based upon race, color, creed, religion, national origin, age, sex or handicap.

It is appropriate that the State of Michigan, in fulfilling that policy, assure compliance with the non-discrimination provisions of state and federal laws whenever grant funds are awarded and used. It is further appropriate that the State not enter into any contract or agreement, not fund or serve as a conduit for funding for programs which may have the effect of creating or perpetuating patterns of discriminatory practice.

All recipients of state grants and federal grants passing through the Michigan Department of History, Arts and Libraries are therefore required to file a statement pledging that there is a reasonable representation of minority group individuals and women in all levels of their work forces and that there exists equal opportunity to participate in and enjoy the benefits of all programs and activities without regard to race, color, religion, national origin, age, sex or handicap.

Subgrantees receiving sums of \$25,000 or more or employing twenty-five persons or more will also be required to complete a written Equal Employment Opportunity Plan.

Enclosed are instructions for completion of the Civil Rights forms that must accompany an application for the Historic Preservation grant. If it is determined at any time that an applicant is not in compliance with the equal opportunity standards established by law, the application will be rejected or the grant agreement terminated.

Definitions *(As used in this document)*

"Subgrantee"	Means any public or private agency, organization or contractor, to whom state or federal funding is extended through the Michigan Department of History, Arts and Libraries
"Contractor"	Means all contractors, vendors, subcontractors and suppliers providing goods or services directly or indirectly to a subgrantee
"Minority Persons"	Means (1) <u>American Indians or Alaskan Natives</u> . Persons having origins in any of the original peoples of North America, and who maintained cultural identification through tribal affiliation or community recognition; (2) <u>Asian or Pacific Islanders</u> . Persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands and Samoa; (3) <u>Blacks</u> . Persons having origin in any of the black racial groups of Africa; (4) <u>Hispanics</u> . Persons of Mexican, Puerto Rican, Cuban, Central or South America or other Spanish culture or origin, regardless of race.
"White Persons"	Means persons having origins in any of the original peoples of Europe, North Africa or the Middle East.
"Facility"	Includes all or any part of structures, equipment or other real or personal property or interests.
"Program, Activity or Service"	Means any function conducted by any unit of the subgrantee or contractor receiving funds through the Michigan Department of History, Arts and Libraries.
"Population Base"	Means the relevant population for the area from which the work force is drawn, (e.g. county, municipality or geographic area).
"Handicap"	Means a determinable physical or mental characteristic of an individual or the history of the characteristic which may result from disease, injury, congenital condition of birth or functional disorder which characteristically is unrelated to the individual's ability to perform the duties of a particular job or position, or is unrelated to the individual's qualifications for employment or promotion, or is unrelated to the individual's ability to utilize and benefit from a program. Qualified handicapped includes a handicapped person who, with reasonable accommodation, can perform the essential functions of the job in question.

What Must Be Submitted With the Grant Application

Recipients *employing fewer than twenty-five (25) employees and submitting grant applications for less than \$25,000* are required to submit the following reports to the Michigan State Housing Development Authority with the application:

- a. The Work Force Status Report (Appendix C1).
- b. The Affirmation of Equal Opportunity (Appendix C2).

Recipients *employing twenty-five (25) or more persons or submitting grant applications for more than \$25,000* are required to submit the following reports with the application:

- a. The Work Force Status Report (Appendix C1).
- b. The Affirmation of Equal Opportunity (Appendix C2).
- c. Work Force Analysis (Appendix C3).
- d. An Equal Opportunity Plan (Appendix C4)

Additional Responsibilities

A subgrantee's responsibilities include requiring its contractors to file a Work Force Status Report and an Affirmation of Equal Opportunity.

Alternative Compliance

A subgrantee who has obtained a current Certificate of Awardability from the Michigan Department of Civil Rights (MDCR) may fulfill the minority and female requirements of these procedures by submitting a copy of the Certificate to the SHPO, Michigan State Housing Development Authority.

Preservation of Record

Each subgrantee/contractor is required to keep employment and other records used in preparation of the above reports for not less than six months beyond the end-date of the contract and to permit access to records by the SHPO of the Michigan State Housing Development Authority, MDCR, or the Office of Equal Opportunity to ascertain compliance with Executive Directive 1979-4 and Title VI of the Civil Rights Act.

Reporting Requirements

Failure to file timely, complete and accurate documents as described above constitutes presumptive noncompliance with the obligations of recipients under Executive Directive 1979-4 and Title VI of the 1964 Civil Rights Act and may be a basis for the imposition of sanctions authorized under Executive Directive 1979-4 and Title VI of the 1964 Civil Rights Act.

Equal Opportunity in the Provision of Services, Activities and Programs

Prohibited Discriminatory Actions

No person in the State of Michigan shall, on the grounds of race, color, religion, national origin, age, sex or handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any contract, program or activity funded in whole or in part with funds made available through any state agency. Prohibited discriminatory actions include, but are not limited to the following:

- Deny any services or other benefit provided.
- Provide any service or other benefit to a minority, female or handicapped person which is different, or is provided in a different form, from that provided to the majority, unless such action is necessary to provide qualified handicapped persons with benefits or services necessary to others.
- Treat a minority, female or handicapped individual differently from others in determining whether the person satisfies any admission, enrollment, eligibility membership or other requirement which persons must meet in order to provide any service or other benefit.
- Deny any person an equal opportunity to participate as an appointed member of a planning or advisory body involved in administering state or federal funds.

Site Selection

Each subgrantee/contractor shall, make selections of site and location of facilities which are available to all individuals without regard to race, color, religion, national origin, age, sex or handicap.

Imbalance in Services

Each subgrantee/contractor shall take no action to improve any imbalance in services or facilities provided to any geographic area or specified group in order to overcome the effects of prior discriminatory practice.

Equal Opportunity Employment

General

In any program or activity funded in whole or in part with public funds, each subgrantee/contractor shall not directly or indirectly subject any individual to unlawful discrimination on the basis of race, religion, color, national origin, age, sex or handicap in its employment practices. These practices include retirement, recruitment advertising, hiring, lay-off, termination, up-grading, demotion, transfer, rates of pay or other forms of compensation, use of facilities, and all other terms and conditions of employment.

Employment Selection Procedures

MDCR, in carrying out its responsibilities under the Michigan Constitution and Act No. 453 of the Public Acts of 1976, has adopted and promulgated the Guidelines on Employee Selection Procedures as published by the U.S. Equal Employment Opportunity Commission (EEOC), to assist in establishing and maintaining equal employment opportunities. Among other things, these guidelines forbid the use of employee selection practices (e.g. tests, minimum educational levels, experience) which disqualify a disproportionate number of minorities or women for employment and which are not related to job performance.

Sex Discrimination

MDCR has adopted and promulgated guidelines on sex discrimination as published by EEOC. Among special requirements relating to equal opportunity for women are:

- There shall be no distinction based upon sex in employment opportunities, wages, hours, the granting of fringe benefits, leave, mandatory or optional retirement age and other terms and conditions of employment.
- Medically verifiable disabilities caused or contributed to by pregnancy, miscarriage, therapeutic abortion, childbirth and recovery shall be treated as temporary disabilities under any health or temporary disability insurance policy or sick leave plan. Written and unwritten employment policies and practices involving matters such as the commencement and duration of leave, the availability of extensions, the accrual of seniority and other benefits, reinstatement, and payment under any health or temporary disability insurance policies or sick leave plans, shall be applied to pregnancy disability or childbirth in the same way as they are applied to other temporary disabilities.
- Advertisements for employment in newspapers and other media must not express a sex preference. The placement of an advertisement in columns "Male" or "Female" is considered to be a discriminatory limitation.
- Nothing in these procedures shall prohibit the hiring of employee's of one sex, provided sex is an established bona fide occupational qualification, as provided under section 208 of Act No. 453 of 1976. A bona fide occupational qualification will be interpreted narrowly. The assumption that women are not aggressive or that co-workers or customers prefer one sex or the other does not establish a bona fide occupational qualification.

Religious Discrimination

MDCR has adopted and promulgated guidelines on religious discrimination, requiring in part that employers make "reasonable" accommodations to the religious needs of employees and applicants for employment. These procedures shall not apply to a religious corporation, association or society with respect to the employment of an individual of the same religion to perform work connected with carrying on its religious activities.

National Origin

MDCR has adopted and promulgated guidelines on national origin discrimination. In addition to the protection guaranteed to all minorities, requiring proficiency in the English language where it is not a requirement for satisfactory performance on the job is prohibited.

Age

A subgrantee or contractor shall not refuse to hire, and shall not otherwise discriminate against, a person with respect to employment because of the age of that person, except as otherwise prohibited by law.

Handicap

With regard to handicapped persons:

- Under the obligations imposed by Executive Directive 1979-4, each subgrantee is required to take specific action to employ and advance in employment qualified handicapped individuals at all levels of employment, including the executive level. Specific action shall apply to all employment practices, including but not limited to: hiring, upgrading, demotion or transfer; recruitment or termination; rates of pay or other forms of compensation; and selection for training including apprenticeship.
- Each subgrantee shall evaluate its total process, including training and promotion, to ensure freedom from stereotyping handicapped persons in a manner that limits their access to all jobs for which they are qualified.
- If a physical or mental job qualification requirement is used in the selection of applicants for employment or changes in employment status such as promotion, demotion or training and to the extent that the requirement tends to screen out qualified handicapped individuals, the requirement shall be related to the specific job for which the individual is being considered. The subgrantee shall bear the burden of demonstrating that it has complied with the requirements of this paragraph.
- Each subgrantee must make reasonable accommodations for the physical and mental limitations of an employee or applicant, unless the contractor can demonstrate that such accommodations would impose an undue hardship. In determining the extent of these accommodation obligations, business necessity and financial cost among other factors may be considered.

Funding Approval

Condition of Approval of EEO

The execution or renewal of any contract awarding a grant covered under Executive Directive 1979-4 shall be conditioned upon written approval of the subgrantee's EEO Affirmation of the Equal Opportunity Plan.

Review of Reports and Program Proposals

The SHPO of the Michigan State Housing Development Authority has primary responsibility to review and accept or reject the reports and program proposals submitted by each subgrantee.

Review of Remedial Action

When the subgrantee/contractor who employs more than 25 employees or receiving grants of \$25,000 or more has areas of underutilization, which require a written plan, the SHPO will review any remedial action which the recipient proposes to take to determine whether the requirements of Executive Directive 1979-4 have been met.

- When the requirements appear to have been met, the recipient will be notified of acceptance on the condition that the proposed corrective action will be taken.
- When the recipient fails to submit a required plan or submits a plan that does not meet the requirements of Executive Directive 1979-4, the SHPO will notify the recipient that the plan (or lack thereof) is not acceptable, specifying each area of deficiency. If necessary, assistance shall be provided to the recipients in revising the plan to meet the Executive Directive.

Review On-Site

On-site compliance reviews of a subgrantee/contractor's program may be scheduled by the SHPO pending or following acceptance of a plan. Priority shall be given to any subgrant that excludes handicapped persons or that has a significant disparity between the percentage of minorities and women in the population area and the percentage in the recipient's work force.

Alternative in Event of Noncompliance

When the SHPO and the subgrantee/contractor cannot agree on a mutually acceptable plan, the SHPO may:

- Declare the subgrantee/contractor unawardable and proceed as in any determination of nonperformance under the contract.
- Notify MDCR that the SHPO and the subgrantee are unable to resolve their differences. Written notice to that effect will be served on the subgrantee by the SHPO.
- Staff from the MDCR will review the file, consider any additional information either party cares to submit, and offer assistance in resolving the differences in a final effort to secure voluntary compliance. Whenever an amicable solution cannot be achieved, MDCR will issue a written determination to the SHPO that the subgrantee/contractor is or is not in compliance. Thereafter, either party may petition MDCR for a hearing as provided for in the rules of the Michigan Civil Rights Commission.

APPENDIX W

Instructions for Work Force Status Report

1. Every subgrantee shall submit a report on the status of the present work force to the SHPO (see next page). The Report shall include the following information:
 - Current total number of employees, and the numbers of minority, female and handicapped employees in all levels of employment.
 - The percentage of minority and the percentage of female employees in all levels of employment.
 - The total number of employees, and the numbers of minority, female and handicapped employees hired and/or terminated for any reason within the preceding 12 months.
 - A calculation of the percentage of minorities and women in the population and in the work force for the geographic area from which employees are drawn, based on figures obtained from the Michigan Employment Security Commission or an equally reliable source. (www.michigan.gov/census) The basis for establishing the geographic area must be included.
 - A comparison of the available percentage of minorities and females (above) and the percentage of minorities and women among the total employees. Reasonable representation for minorities and females means employing a work force which reflects the percentage of minorities and females in the population base at all job levels and in all cases. A subgrantee or contractor whose work force does not meet this standard is required to take remedial action, described in Appendices 2 or 3.
 - Provide the date of the payroll used to obtain the workforce breakdown.
 - Fill in minority population figures for your area by using the Minority Population percentages in this manual.
 - Circle each percentage that is less than the minority availability for your area in the "Minority %" column.
 - Circle each percentage that is less than 51 percent, which is the statewide percentage of females in the labor force, in the "Female %" column

The subgrantee shall submit the Work Force Status Report to:

**MHRP Grant Administrator
State Historic Preservation Office
Michigan State Housing Development Authority
P.O. Box 30740
702 West Kalamazoo Street
Lansing, MI 48909-8240**

WORK FORCE STATUS REPORT

Payroll Date Used _____

Minority Population Base _____

Job Category	Total	Black		Hispanic		American Indian		Female		Minority		Handicapped	
		M	F	M	F	M	F	Total	%	Total	%	Total	%
Administrative													
Professional													
Technicians													
Office/Clericals													
Service/Maintenance													
TOTAL													

NEW HIRES

New Hires Within Last Year													
Terminated													

WAGE RANGE

Annual Salary	Administrative	Professionals	Technicians	Office/Clericals	Service/Maintenance
Minimum					
Maximum					

1. Provide date of the payroll used to obtain the workforce breakdown.
2. Fill-in Minority Population figure for your area.
3. Use the Minority Population percentages on the following pages.
4. Circle each percentage, which is less than minority availability for your area in the Percentage Minority Column.
5. Circle each percentage, which is less than 51%, which is the statewide % of females in the labor force, in the Female column.
6. Is residence required for employees in the above classification?

Name	Date
Organization	

Return Form To:

MHRP Grant Administrator
State Historic Preservation Office
Michigan State Housing Development Authority
P.O. Box 30740
702 West Kalamazoo Street
Lansing, MI 48909-8240

Michigan Population Statistics – By County

Source: 2010 U.S. Census

COUNTY	% TOTAL MINORITY	% BLACK	% HISPANIC	% AMERICAN INDIAN	% ASIAN AMERICAN	% OTHER MINORITY
Alcona	2.2	0.1	1.1	0.6	0.2	0.2
Alger	12.1	6.4	1.2	4.1	0.3	0.1
Allegan	11.9	1.2	6.7	0.6	0.6	2.8
Alpena	2.4	0.3	1	0.5	0.5	0.1
Antrim	3.5	0.2	1.7	1	0.2	0.4
Arenac	3.4	0.2	1.4	1.2	0.2	0.4
Baraga	21.6	7.2	1	13.1	0.1	0.2
Barry	4.2	0.4	2.3	0.5	0.4	0.6
Bay	8.3	1.6	4.7	0.5	0.5	1
Benzie	4.3	0.4	1.7	1.4	0.3	0.5
Berrien	23.8	15.3	4.5	0.5	1.6	1.9
Branch	9.6	3.1	4	0.4	0.5	1.6
Calhoun	19.1	10.9	4.5	0.6	1.6	1.5
Cass	11.1	5.4	3	1	0.6	1.1
Charlevoix	4.0	0.3	1.4	1.5	0.4	0.4
Cheboygan	4.7	0.5	0.8	3	0.3	0.1
Chippewa	24.4	6.5	1.2	15.8	0.6	0.3
Clare	3.2	0.5	1.5	0.7	0.3	0.2
Clinton	9.1	2.1	3.9	0.4	1.5	1.2
Crawford	2.7	0.4	1.3	0.5	0.4	0.1
Delta	4.1	0.2	0.9	2.4	0.4	0.2
Dickinson	2.6	0.3	1	0.6	0.5	0.2
Eaton	14.3	6.3	4.7	0.4	1.7	1.2
Emmet	6.2	0.5	1.3	3.7	0.5	0.2
Genesee	25.8	20.7	3	0.5	0.9	0.7
Gladwin	2.5	0.2	1.2	0.5	0.3	0.3
Gogebic	7.8	4.1	0.9	2.4	0.2	0.2
Grand Traverse	5.9	1.2	2.2	1.2	0.7	0.6
Gratiot	13.4	5.5	5.4	0.5	0.3	1.7
Hillsdale	3.5	0.5	1.8	0.4	0.4	0.4
Houghton	5.3	0.5	1.1	0.6	2.9	0.2
Huron	3.5	0.4	2	0.3	0.4	0.4
Ingham	27.2	11.8	7.3	0.6	5.2	2.3
Ionia	11.3	4.7	4.4	0.5	0.4	1.3
Iosco	3.8	0.5	1.6	0.7	0.5	0.5
Iron	2.9	0.1	1.4	0.9	0.3	0.2
Isabella	11.1	2.4	3.1	3.4	1.6	0.6
Jackson	12.8	7.9	3	0.4	0.7	0.8
Kalamazoo	18.9	10.9	4	0.4	2.1	1.5
Kalkaska	2.8	0.3	1.2	0.9	0.2	0.2
Kent	26.7	9.7	9.7	0.5	2.3	4.5

COUNTY	% TOTAL MINORITY	% BLACK	% HISPANIC	% AMERICAN INDIAN	% ASIAN AMERICAN	% OTHER MINORITY
Keweenaw	0.9	0.1	0.7	0.1	0	0
Lake	12.5	9.2	2.1	0.8	0.1	0.3
Lapeer	7.1	1	4.1	0.5	0.3	1.2
Leelanau	8.9	0.3	3.7	3.5	0.4	1
Lenawee	13.1	2.5	7.6	0.5	0.5	2
Livingston	3.9	0.4	1.9	0.4	0.8	0.4
Luce	17.6	11.1	1.2	5	0.3	0
Mackinac	19.3	0.5	1.1	17.3	0.2	0.2
Macomb	14.8	8.6	2.3	0.3	3	0.6
Manistee	8.6	2.9	2.6	2.1	0.3	0.7
Marquette	5.3	1.7	1.1	1.7	0.6	0.2
Mason	7.3	0.6	4	1	0.5	1.2
Mecosta	5.9	2.5	1.7	0.6	0.7	0.4
Menominee	4.7	0.3	1.2	2.7	0.3	0.2
Midland	6.0	1.2	2	0.4	1.9	0.5
Missaukee	3.8	0.3	2.1	0.6	0.3	0.5
Monroe	6.9	2.1	3.1	0.3	0.6	0.8
Montcalm	7.2	2.3	3.1	0.5	0.4	0.9
Montmorency	1.9	0.2	1	0.4	0.2	0.1
Muskegon	22.0	14.5	4.8	0.8	0.5	1.4
Newaygo	9.6	1	5.5	0.8	0.4	1.9
Oakland	24.0	13.6	3.5	0.3	5.6	1
Oceana	21.5	0.4	13.7	1.1	0.2	6.1
Ogemaw	2.9	0.2	1.4	0.7	0.4	0.2
Ontonagon	2.4	0.1	0.9	1.1	0.2	0.1
Osceola	3.0	0.6	1.5	0.5	0.2	0.2
Oscoda	2.0	0.2	0.9	0.6	0.1	0.2
Otsego	2.8	0.3	1.2	0.7	0.4	0.2
Ottawa	16.5	1.5	8.6	0.4	2.6	3.4
Presque Isle	2.4	0.4	0.9	0.7	0.3	0.1
Roscommon	2.6	0.4	1.1	0.6	0.3	0.2
Saginaw	30.7	19	7.8	0.4	1.1	2.4
St. Clair	6.9	2.4	2.9	0.4	0.5	0.7
St. Joseph	13.9	2.6	6.6	0.5	0.7	3.5
Sanilac	5.5	0.3	3.3	0.5	0.3	1.1
Schoolcraft	10.0	0.1	0.8	8.8	0.2	0.1
Shiawassee	4.3	0.5	2.4	0.5	0.4	0.5
Tuscola	5.4	1.1	2.8	0.5	0.3	0.7
Van Buren	20.8	4.1	10.2	0.9	0.4	5.2
Washtenaw	26.1	12.7	4	0.3	7.9	1.2
Wayne	50.4	40.5	5.2	0.4	2.5	1.8
Wexford	3.6	0.4	1.6	0.6	0.6	0.4

APPENDIX X

Affirmation of Equal Opportunity

The Subgrantee/contractor hereby affirms a policy of equal opportunity in employment and participation in and benefit from all programs, activities, and services without regard to race, color, religion, national origin, age, sex, or handicap.

The subgrantee/contractor hereby agrees to:

- Take all remedial steps necessary to correct any under-representation of minorities or women reported on the Work Force Status Report.
- To achieve a reasonably representative work force at all levels of employment.
- State in all promotional, and advertising materials that all programs, services and activities are performed without regard to race, color, religion, national origin, age, sex or handicap and that in employment practices all applicants shall receive equal consideration.
- Post, in a conspicuous place, notices setting forth the law on equal opportunity in employment and services. (Posters are available from the SHPO, Michigan State Housing Development Authority or the Michigan Department of Civil Rights).

Print Name	
Signature	Date
Title	
Organization	

Return Form To:

**MHRP Grant Administrator
State Historic Preservation Office
Michigan State Housing Development Authority
P.O. Box 30740
702 West Kalamazoo Street
Lansing, MI 48909-8240**

APPENDIX Y

Work Force Analysis

In addition to completing Appendix 1 and 2, a subgrantee/contractor with a contract in excess of \$25,000, or employing 25 or more persons is required to prepare the following analysis:

- The first step in analyzing the present representation of minority and female persons accomplished by completing the Work Force Status Report. If minority and female work force in all job categories is equal or exceeds the standard at all levels, no further analysis is required for minorities and women.
- The first step in providing equal opportunity for handicapped persons shall be a self-evaluation that shall identify any selection, promotion or training programs, which exclude or tend to exclude handicapped persons who are otherwise qualified to perform a particular job.
- Each subgrantee/contractor is required to conduct a continuing program of self-evaluation to ascertain whether any recruitment, selection or promotional policy directly or indirectly has the effect of denying equal opportunities to minority individuals, women or handicapped persons.
- In making the evaluation of employment opportunities, the subgrantee/contractor shall conduct a separate analysis for minorities, women and handicapped persons. However, all racial and ethnical data collected should be cross-classified by sex to ascertain to which minority women and minority men may be under-utilized.
- Whenever under-utilization of minorities and women occurs or whenever conditions have resulted in the limited participation of handicapped persons, it will be necessary to identify those policies and procedures which operate to the disadvantage of minorities, women or handicapped persons. The analysis should include:
 1. A review of the employment selection procedures for the preceding fiscal year, including application forms, recruitment methods, interview procedures, test validity, experience or education requirements and final selection methods to insure that minorities, women and handicapped persons are not disadvantaged by unnecessary barriers. The number of individuals by race, sex, national origin and handicap applying for employment within the preceding fiscal year should be compared with the number of applicants who were offered employment and those who were actually hired. Attention should be paid to the reasons for rejection and the effects on minorities, women and handicapped persons. If such data is unavailable the subgrantee should institute a system for collection of such data.
 2. A review of promotion procedures and training programs during the preceding year in order to insure equal opportunity. The race, age, national origin and handicap of applicants who made application for promotion or training should be compared with the number who were actually promoted or trained.
 3. For handicapped persons, the subgrantee shall invite applicants and employees who believe themselves covered by the Executive Directive and who wish to benefit under the affirmative action program to identify themselves as handicapped. The invitation shall state that the information is voluntary, and will be used only in accordance with the Executive Directive. Refusal to provide the information will not result in adverse treatment. If a handicapped person is identified the subgrantee should seek suggestions from the applicant or employee regarding proper placement and appropriate accommodations.

APPENDIX Z

Equal Employment Opportunity Plan

This section applies to those plan/contractors employing 25 or more or contracts in excess of \$25,000 and who have an under-utilization of minorities and females or limited participation of handicapped persons in one or more areas. A written Equal Opportunity Plan shall specifically address the areas of under-utilization for minorities, women or handicapped persons and shall include:

- A plan for the recruitment of minorities, women and handicapped persons based on what is necessary to attract applicants including but not limited to use of advertising media patronized by women, minorities and handicapped persons.
- A statement of the plan's existing employment policies and practices, e.g., testing, experience and education requirements, with particular emphasis on steps which have been taken or will be taken to assure that each is job related.
- An evaluation of the effect the policies and practices have on minorities, women and handicapped persons. Specific attention should be given to transfer and promotion policies and procedures, including credit for departmental seniority that may disadvantage women, minorities and handicapped persons. Where improvement is necessary, the plan shall set forth the steps that will be taken to assure equal opportunity.
- The equal opportunity goal is the employment of minorities and women in each job category so that the work force reflects the percentage of minorities and women found in the population base. In establishing goals and timetables for the employment of minorities and women during the life of the contract, the availability for specific job categories may be determined by the following factors:
 1. The minority and female population of the labor area surrounding the facility;
 2. The availability of minorities and females having requisite skills in an area in which the plan can reasonably recruit;
 3. The availability of minorities and females within the work force who may be transferred or promoted;
 4. The existence of training institutions capable of preparing minority persons and females in the requisite skills.

These goals should be significant, measurable and attainable. In establishing timetables to meet the goals, the plan or contractor will consider the anticipated expansion, contraction or turnover of the work force. In no case are the goals to be viewed as rigid quotas. The purpose of setting a projected goal is to permit the plan to measure the success of the steps taken to implement equal employment opportunity. Failure to meet a goal should alert the employer that the plan is not working and that additional action is required.

Provision for dissemination of the Equal Employment Opportunity Plan to all personnel, applicants and the general public.