



Pam Kuechler, Executive Director
Steven Ponte, Board President

AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT PLAN

PREAMBLE


We, the Board of Directors of People Acting in Community Endeavors, Inc. (P.A.C.E., Inc.) hereby recognize that when the effects of employment practices, regardless of their intent, discriminate against any group of people on the basis of race, religion, age, sex, handicap, national origin, or sexual orientation, specific affirmative actions must be taken to eliminate present and future discrimination and to provide equitable remedies for the consequences of past discrimination.

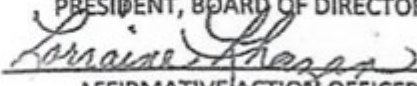
Therefore, under the legal authority of:

- Equal Pay Act of 1963
- Title VII of the Civil Rights Act of 1964
- Age Discrimination Act of 1967
- Executive Order 11246, as amended
- Section 504 of the Rehabilitation Act of 1973
- Massachusetts Fair Employment Practices Law, as amended
- Executive Order No. 227
- Executive Order No. 237
- Executive Order No. 235, as amended
- Americans with Disabilities Act of 1990
- Civil Rights Act of 1991

I, commit myself and P.A.C.E., Inc. employees within the context of existing law, to a policy of non-discrimination in employment, and a commitment to take positive action in behalf of minority persons, women, Vietnam Era Veterans, handicap persons, and persons 40 years and older.

JULY, 2024
DATE



 PRESIDENT, BOARD OF DIRECTORS


 AFFIRMATIVE ACTION OFFICER

POLICY

It is the policy of P.A.C.E., Inc. to ensure equal opportunities to all persons regardless of race, sex, creed, color, age, national origin or handicap. P.A.C.E., Inc., shall work within the framework of Federal, State Law, Executive Orders and Policies to ensure equal employment opportunity. P.A.C.E., Inc., is committed to affirmative action to preclude any form of discrimination, and P.A.C.E., Inc. shall maintain this policy of affirmative action covering all aspects of hiring, employment and promotion.

P.A.C.E., Inc., shall also promote equal access to services in programs sponsored by P.A.C.E., Inc. in public appearances and in daily administration of their responsibilities, the staff of P.A.C.E., Inc. shall take affirmative and positive action in the employment of minorities, women, elderly, handicapped, and Vietnam Era Veterans.

POLICY DISSEMINATION

P.A.C.E., Inc. will announce its policy on affirmative action and equal employment by the following methods:

1. A copy of the Plan will be posted on all bulletin boards where official P.A.C.E., Inc. notices are displayed.
2. An information memorandum will be distributed to all P.A.C.E., Inc. personnel that summarizes the provisions of the plan.
3. A special meeting will be convened for the P.A.C.E., Inc.'s executive, managerial, and supervisory personnel, to acquaint them with the Plan and with P.A.C.E., Inc.'s equal employment goals and assure their commitment to those goals.
4. All schools, organizations, and other sources of potential employees that are regularly used by P.A.C.E., Inc. for the recruitment of new personnel will be notified in writing of the provisions of the Plan.

Furthermore, in all relevant future contracts, communications or advertisements of/for P.A.C.E., Inc. will include reference to the provisions of the Plan. In particular, P.A.C.E., Inc. will include a summary of the Plan in its employee handbook and other P.A.C.E., Inc. publications; inform all job applicants of P.A.C.E., Inc.'s plan for affirmative action at the time of the job interview; and notify all prospective consultants and contractors in writing of the Plan.

CENTRAL COORDINATION

P.A.C.E., Inc., will select one of its staff to manage and oversee all aspects of this plan. All other staff will be directed to give full cooperation to the Affirmative Action Officer and to consult said officer on all questions of employment, affirmative action and implementation of regulations of Section #504 of Rehabilitation Act of 1973.

It is P.A.C.E., Inc.'s policy to give priority attention to the identification and correction of under-representation or under-utilization of minority persons and women within P.A.C.E., Inc.'s staff.

THE SELECTION PROCESS

P.A.C.E., Inc. will take positive action to eliminate barriers to equal employment in the two phases of the selection process: the establishment of job descriptions and related qualifications; and the procedures used in interviewing job applicants.

A. Job descriptions, specifications, and classifications:

From time-to-time, P.A.C.E. will have reviewed and, where necessary, revise its job specifications.

The objectives of the review and revision of job specifications are as follows:

1. To accurately describe the duties that the incumbent will perform.
2. To eliminate required qualifications that are overly restrictive or not related to the duties to be performed, including overly restrictive requirements with respect to the speaking and writing of English.
3. To identify jobs where the ability to speak Spanish and Portuguese is advantageous.
4. To develop and clarify promotional "ladders" available to employees who seek an opportunity to advance.

B. Interviews:

P.A.C.E. will conduct a training session for all employees who interview job applicants. Interviewers will be notified both at this training session and in writing that they are to restrict their questions during an interview to topics which relate clearly to expected job performance, and to base their recommendations on the same criteria.

Interviewers will be cautioned to use the same lines of questioning for women as they do for men.

It is the P.A.C.E. policy that the selection of an applicant will not be made on the basis of a single interview. At least three persons will be interviewed and considered for each vacancy that is to be filled. When less than three persons are interviewed, detailed justification will be filed with the Affirmative Action Officer for acceptance or denial.

OUTREACH AND RECRUITMENT

P.A.C.E., Inc. recognizes that an essential step in achieving its equal employment objectives is the dissemination of job vacancy information to the minority, handicapped, female, elderly

populations and Vietnam Era Veterans. It will therefore, undertake an aggressive recruitment program to locate qualified women, the handicapped, minority persons, elders and Vietnam Era Veterans to encourage them to apply for positions with P.A.C.E., Inc.

To supplement the recruiting effort, P.A.C.E., Inc., will hereafter contact the following sources for job candidates on a regular basis:

1. Organizations representing minority people and women: see attached mailing list.
2. Schools and colleges, including UMASS, and Bristol Community College.
3. Newspapers, magazines, television and radio stations that reach the minority community and/or women or handicapped.
4. Organizations representing older people: Councils on Aging, area agency on Aging.
5. Recruitment agencies that specialize in the hiring of minority persons or women.

P.A.C.E., Inc. contact or communication with a recruitment source will be free of implied or explicit preferences for particular race, sex or age group. All "Help Wanted" advertisements, posters, or other notices shall include the phrase "Equal Opportunity Employer", and will be prepared in an uncomplicated, easy-to-read format.

P.A.C.E., Inc. will set up a "remedial file" of its present minority and female employees who wish to be included in such a file.

The "remedial action file" will be established within three (3) months from the effective date of this document. During the compilation of this file, the Affirmative Action Officer or his appointed designee will interview and review the records of each minority or female employee who wishes to be included to:

1. Update records on an individual's qualifications, education, experience, seniority and performance on the job; thus
2. Identifying individuals who appear to be working in jobs that are below their abilities; and
3. Providing each individual with an assessment of his or her opportunities for advancement, and the prerequisites for such advancement.

P.A.C.E., Inc. will consult the "remedial action file" first when it plans to fill a vacant position through promotion of P.A.C.E., Inc. staff.

Those individuals listed in the "remedial action file" who are in "dead-end" jobs with little or no promotional outlook will be notified of all opportunities with P.A.C.E., Inc. for a lateral transfer into a position that would gain them entry to a promotional ladder. (In the interim, P.A.C.E.,

Inc. will look for opportunities to broaden their present assignments, or to apprentice them to other employees to provide added experience and to improve job-related skills).

TRAINING

P.A.C.E., Inc recognizes that its affirmative action program must contain a training component to provide skills that are essential to jobs where minorities, elderly, handicapped, and women are under-represented and to compensate for deficiencies in education and/or experience that resulted from past discrimination.

P.A.C.E., Inc. will therefore, make full use of the various training programs available to help meet its objectives for hiring and promoting minority persons and women.

RECORDKEEPING

P.A.C.E., Inc. will keep accurate records relating to all employment procedures outlined in this plan. Said records will be sufficiently detailed to document the agency's compliance with the Affirmative Action Plan and will be used in all evaluations of the plan. P.A.C.E., Inc. contractors will be required to provide a copy of their Affirmative Action Plan.

SCHEDULE

A staff person shall be the responsible official for the implementation of the Affirmative Action Plan, and shall be designated by the Board to be an Affirmative Action Officer.

EQUAL OPPORTUNITY IN EMPLOYMENT

To ensure, if possible, at least one qualified minority, one qualified woman, one qualified handicapped person, and one elderly person are located in every advertised vacancy.

EVALUATION

To ensure proper implementation of the Plan, the Equal Employment Officer, with input from staff, personnel committee, and the Board of Directors shall evaluate the plan every six months. Said evaluation will focus on all aspects of the plan, especially those areas relating to recruitment and employment.

PROGRAMS FOR THE HANDICAPPED

General Policy

In accordance with the requirements of Executive Order 246, this agency agrees to implement a procedure involving an invitation to self-identify on the basis of handicap. The procedure will establish the status of the applicant/employee as a handicapped person, for affirmative action purposes. (See SOAA Handicapped Guidelines).

No handicapped employee will be counted in the workforce analysis unless he/she has completed the process of self-identification, verification, and confirmation.

This agency will take affirmative action to employ and promote qualified handicapped individuals at all levels of employment, including the executive level. It shall ensure equal opportunity through affirmative action in the areas of: hiring, promotion, demotion, transfer, recruitment, recruitment advertising, termination, and training. In addition, P.A.C.E., Inc. shall:

1. Provide a program of information and awareness training about handicapped persons to all supervisors and interviews;
2. Review all physical and/or mental job qualification requirements to ensure that they do not tend to screen out qualified handicapped individuals;
3. Eliminate unnecessary, non-job related mental and/or physical requirements for entry into each job;
4. In the area of promotion, when a vacancy occurs, institute an internal search to determine if there is a qualified handicapped employee who could be promoted;
5. Develop alternate methods of informing handicapped employees of relevant information (such as informing visually impaired individuals or announcements posted on bulletin boards);
6. Review employee performance appraisal to ensure that no discriminatory patterns or practices exist or are developed affecting handicapped employees or applicants; and
7. Provide reasonable accommodation in all areas of accessibility.

Reasonable Accommodation

P.A.C.E., Inc. shall make a reasonable accommodation to the physical and/or mental limitations of a handicapped person whenever this person requests such an accommodation, unless it can be demonstrated by this Agency that such an accommodation would impose an undue hardship. (See Handicapped Guidelines).

A request for reasonable accommodations may be made at any time, and is in no way contingent on the separate process of voluntarily self-identification for affirmative action purposes.

Reasonable accommodation, according to Executive Order 246, means any accommodation which has not been shown to impose undue hardship upon the program or activity. Essentially, this means removing barriers which prevent or limit employment opportunities for eligible handicapped persons. Accommodations may include but are not limited to: accessibility to the

agency's premises; the provision of support services such as readers and interpreters; the provision or modification of equipment and supportive devices; modified work schedules or leave policy; and other potential accommodations.

VIETNAM ERA VETERANS PROGRAM

General Policy

P.A.C.E., Inc. agrees to take affirmative action to employ and advance Vietnam Era Veterans in all levels of employment, including the executive level. It shall ensure equal opportunity through affirmative action in the areas of: hiring, upgrading, demotion, transfer, recruitment, recruitment advertising, classification, compensation benefits, promotions, termination and training.

Program

The Agency shall:

Invite all Vietnam Era Veterans, employees and applicants, who wish to benefit under the affirmative action program to identify themselves to the Agency and provide a copy of their DD 214 Form to verify their status by the Agency.

Resolution Process

General Policy

This agency is committed to provide the opportunity for any protected group member to voice and resolve any infringement of equal opportunity or affirmative action rights that are assured through executive order of the Commonwealth of Massachusetts.

Accordingly, this Agency has established an affirmative action grievance procedure.

The grievance procedure may be used for allegations of adverse impact, maltreatment, or harassment based on race, sex, handicap, or status as Vietnam Era Veterans; allegations of failure to make reasonable accommodation for a person's disability; or any and all other issues arising from Executive Order No. 200, 240, 227, 246, 235, or 253 and related to this Affirmative Action Plan.

P.A.C.E. AFFIRMATIVE ACTION GOALS

The Affirmative Action Plan has a goal of 50% minorities, women, Vietnam Era Veterans, Handicapped, and elderly in the entire staff with at least one minority in each category of employment. One aim will be to reach our goal as these positions open up.

Categories are presently defined as management, professional and support.

Further goals and timetables will be suggested by the Affirmative Action Committee as P.A.C.E. grows. The Affirmative Action Committee shall review the Affirmative Action Plan quarterly for assessment and update.

**(GOAL SETTING WORKSHEET)
MINORITIES**

PROVIDER _____

PLAN BEGIN DATE: _____

EMP – Employee

SEMI-ANNUAL: _____

MIN – Minorities

SEMI-ANNUAL: _____

PAR – Parity

UND – Underutilization

JOB CATEGORY	TOTAL PERCENTAGES					**OPENINGS	GOAL	TOTAL		TOTAL	
	EMP	MIN	*PAR	MIN	UND			EMP	MIN	EMP	MIN
MANAGEMENT											
PROFESSIONAL											
SUPPORT											

NOTES: *Parity percentage goals are used as a standard to measure workforce representation and should reflect the population in the Geographic Area where program operates.

**Openings include current plus projected vacancies for next 12 months.

(SEMI-ANNUAL REPORT)

PROVIDER: _____

DATE: _____

AA OFFICER: _____

W – White (includes Portuguese)
 B – Black
 H – Hispanic
 A – Asian/Pacific Islander
 NA – Native American/Indian/Eskimo
 VEV – Vietnam Era Veteran
 HAN – Handicapped

JOB CATEGORY	TOTAL # OF EMPLOYEES	TOTAL MALE # %	MALE					TOTAL FEMALE # %	FEMALE					TOTAL MINORITY # %	TOTAL VEV # %	TOTAL HAN # %
			W	B	H	A	NA		W	B	H	A	NA			
MANAGEMENT																
PROFESSIONAL																
SUPPORT																

NOTE: (1) Figures should include part-time employees, but should be reported as full-time equivalents (FTE).

FTE is obtained by dividing the number of hours scheduled to work by the number of hours designated as full-time.

EXAMPLE: 2 Management Employees – 1 Black Female works 40 hrs./wk. and 1 White Female works 20 hrs./wk., 40 hrs. in considered full-time. The FTE is $20/40 = 0.5$ and the 2 employees would be recorded as follows: Female B-1; Female W-.5; total Female 1.5.

(2) Total Minority is Total of B, H, A and NA recorded under both Male and Female.

(3) Total # of employees should equal total # of males plus total # of females only.

(4) Employees listed under VEV and/or HAN should also be recorded under the appropriate ethnicity under male or female.

**(GOAL SETTING WORKSHEET)
FEMALES**

PROVIDER _____

PLAN BEGIN DATE: _____

EMP – Employee

SEMI-ANNUAL: _____

MIN – Minorities

SEMI-ANNUAL: _____

PAR – Parity

UND – Underutilization

JOB CATEGORY	TOTAL PERCENTAGES					**OPENINGS	GOAL	TOTAL		TOTAL	
	EMP	MIN	*PAR	MIN	UND			EMP	MIN	EMP	MIN
MANAGEMENT											
PROFESSIONAL											
SUPPORT											

NOTES: *Parity percentage goals are used as a standard to measure workforce representation and should reflect the population in the Geographic Area where program operates.

**Openings include current plus projected vacancies for next 12 months.

**(GOAL SETTING WORKSHEET)
HANDICAPPED**

PROVIDER _____

PLAN BEGIN DATE: _____

EMP – Employee

SEMI-ANNUAL: _____

MIN – Minorities

SEMI-ANNUAL: _____

PAR – Parity

UND – Underutilization

JOB CATEGORY	TOTAL PERCENTAGES					**OPENINGS	GOAL	TOTAL		TOTAL	
	EMP	MIN	*PAR	MIN	UND			EMP	MIN	EMP	MIN
MANAGEMENT											
PROFESSIONAL											
SUPPORT											

NOTES: *Parity percentage goals are used as a standard to measure workforce representation and should reflect the population in the Geographic Area where program operates.

**Openings include current plus projected vacancies for next 12 months.

**(GOAL SETTING WORKSHEET)
VIETNAM ERA VETERANS**

PROVIDER _____

PLAN BEGIN DATE: _____

EMP – Employee

SEMI-ANNUAL: _____

MIN – Minorities

SEMI-ANNUAL: _____

PAR – Parity

UND – Underutilization

JOB CATEGORY	TOTAL PERCENTAGES					**OPENINGS	GOAL	TOTAL		TOTAL	
	EMP	MIN	*PAR	MIN	UND			EMP	MIN	EMP	MIN
MANAGEMENT											
PROFESSIONAL											
SUPPORT											

NOTES: *Parity percentage goals are used as a standard to measure workforce representation and should reflect the population in the Geographic Area where program operates.

**Openings include current plus projected vacancies for next 12 months.

AREAS OF SPECIAL CONCERN

This Agency has conducted an evaluation of its policies and programs. It has determined that the following areas require special attention within the designated time period in order to fulfill Affirmative Action goals.

AREAS OF SPECIAL CONCERN

ACTION TO BE TAKEN

ACCOMPLISHED BY

POSITION LEVELS

MANAGEMENT

1. Executive Director
2. Director of Finance
3. Director of Programs
4. Director of Human Resources
5. Director of Fuel Assistance
6. Director of Head Start
7. Director of Weatherization
8. Director of Voucher Day Care
9. Director of Child Care Works
10. Director of Lead Prevention Program
11. Homelessness Intercept Program Director
12. Director of Youthbuild

PROFESSIONAL

1. Certification Supervisor
2. Data Processing Supervisor
3. Weatherization Auditor
4. Assistant Teacher (2)
5. Homeless Case Manager
6. Intake/Outreach Supervisor

7. Intake/Certification Manager
8. Child Care Works Parent Educator
9. Training Project Coordinator
10. Head Start Home Visitor
11. Transitional Case Manager
12. Training and Technical Assistance Coordinator
13. Voucher Counselor (3)
14. Teacher (15)
15. Education Coordinator
16. Head Start Administrative Coordinator
17. Fuel Assistance Administrative Assistant
18. Lead Teacher (15)
19. Special Needs Coordinator
20. Health Assistant
21. Health Coordinator
22. Social Service Coordinator
23. Resource Development Coordinator
24. Site Coordinator
25. Housing Organizer
26. Program Systems Specialist
27. Housing Services Program Coordinator
28. Housing Technician/Tenant Counselor

29. Housing Technician/Landlord Counselor

30. Parent Involvement Coordinator

SUPPORT

1. Administrative Assistant to the Executive Director

2. Human Resources Assistant

3. Receptionist

4. Main Office Custodian

5. Head Start Custodian

6. Financial Coordinator

7. Head Cook

8. Lead Information and Referral

9. Payment Processing Specialist

10. Program Assistant

11. Housing Secretary/Receptionist

12. Resource Developer

13. Cook

14. Head Start Secretary

15. Fiscal Clerk

16. Information and Referral Specialist

17. Intake Clerk

18. Certification Clerk

19. Weatherization Clerk Typist

20. Bookkeeper
21. Billing Specialist
22. Child Care Works Clerk Typist
23. Intake/Certification Clerk
24. Data Entry Clerk
25. Head Start Family Service Worker
26. Head Start Food Service Worker
27. Data Entry/Fiscal Clerk
28. Heartwap Program Technician

SELF-IDENTIFICATION OF DISABILITY

PURPOSE OF FORM

In accordance with Executive Order #227, the Governor's Code of Fair Practice, and Executive Order #246, Affirmative Action Program for the Handicapped, each employee and applicant for employment within the executive branch of state government is invited to indicate whether he/she is handicapped, for purposes of receiving the affirmative action benefits of protected status. This information is intended for use solely in connection with the Commonwealth's affirmative action efforts. It is being requested on a voluntary basis, and refusal to provide it will not subject you to any adverse treatment. The information will be kept confidential and used only in accordance with the State Office of Affirmative Action guidelines and any applicable Federal regulations (e.g. 45 C.F.R. Part 84) implementing Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. S794).

A self-identification is presumed accurate, pending verification and issuance of a document confirming the individual's protected status. *This process is completed only once to confirm protected status for purposes of affirmative action by any agency within the executive branch. A self-identified applicant for employment is not required to provide verification of disability during the hiring process, and hiring cannot be made contingent on verification, but protected status must be documented within 30 days of employment. The self-identifying individuals must submit to the Affirmative Action Manager a separate Verification of Disability form completed by a physician, or a state agency such as the Commission for the Blind, Commission for the Deaf and Hard of Hearing, Department of Mental Health, Department of Mental Retardation or Massachusetts Rehabilitation Commission.

DO YOU QUALIFY FOR PROTECTED STATUS

You will qualify for protected status if you (1) have a physical or mental impairment which substantially limits one or more life activities or (2) have a record of such an impairment. (You may not claim protected status for affirmative action purposes on the grounds that you are "regarded as having such an impairment" but you may, on that basis, invoke the protection of state and federal laws prohibiting discrimination on the basis of handicap.) "Major life activities" means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

SELF-IDENTIFICATION

PLEASE PRINT: I _____, _____
(Name) (Job Title, if any)

_____ () am employed
(Street Address) (City/State) (Zip Code)

() an applicant for employment at the: _____
(dept./division/agency)

_____ (Street Address) (City/State) (Zip Code)

Voluntarily self-identified as handicapped, according to the definition given above. I understand that my protected status is subject to verification.

Signature: _____ Date: _____

***IF PROTECTED STATUS IS DENIED, THE SELF-IDENTIFIED INDIVIDUAL MAY APPEAL THE DECISION TO THE STATE OFFICE OF AFFIRMATIVE ACTION.**

VERIFICATION OF DISABILITY

PURPOSE OF FORM

In accordance with Executive Order #227, the Governor's Code of Fair Practice and Executive Order #246, Affirmative Action Program for the Handicapped, each employee and applicant for employment within the executive branch of state government is invited to indicate whether he/she is handicapped, for purposes of receiving the affirmative action benefits of protected status. A self-identification is presumed accurate, pending verification and issuance of a document confirming the individual's protected status. This process is completed only once to confirm protected status for purposes of affirmative action by an agency within the executive branch of government. Verification of disability must be provided on this form by a physician, or a state agency such as the Commission for the Blind, Commission for the Deaf and Hard of Hearing, Department of Mental Health, Department of Mental Retardation, or the Massachusetts Rehabilitation Commission.

AUTHORIZATION FOR COMPLETION OF FORM BY PHYSICIAN OR AGENCY

I authorize _____ to complete this form.
(Name of Physician or Agency)

PLEASE PRINT:

NAME: _____ TELEPHONE: _____

ADDRESS: _____ CITY/STATE/ZIP: _____

SIGNATURE: _____ DATE: _____

INSTRUCTIONS TO PHYSICIAN OR AGENCY

The above individual has a limited time (normally twenty (20) working days) to provide verification of his/her disability. Your cooperation in promptly completing and returning this form to the individual for submission to the Affirmative Action Manager will be appreciated. If the above individual has, or has had a record of, any of the handicaps listed in the three categories (A,B, and C) on the attached form, please check the appropriate box, print your name, office and address and telephone number on the lines below, and sign the form. Check **ONLY ONE** box. **DO NOT** identify the individual's precise disability or add information about the individual's medical condition or history to this form.

GROUP A () (check this box if you can verify a handicap in Group A, even if you could also verify a handicap in Group B or C)

GROUP B () (check this box if you can verify a handicap in Group B, but none in Group A, even if you can also verify a handicap in Group C)

GROUP C () (check this box if you can verify a handicap in Group C, but none in Group A or Group B)

PLEASE PRINT:

NAME: _____

ADDRESS: _____

CITY/STATE: _____ ZIP CODE _____

TELEPHONE: _____

Signature of Physician or Authorized Officer

of Agency: _____ Date: _____

CATEGORIES OF HANDICAP

For purposes of verification, the verifying signee will choose one of these groups within which the self-identifying individual falls.

GROUP A

HEARING IMPAIRMENTS

Severe to profound hearing impairment in the better ear without amplification.

Hearing impairment of any degree or an auditory condition resulting in visual input as the primary receptive avenue of communication.

VISION IMPAIRMENTS

Inability to read ordinary size print not correctable by glasses. (Can read oversized print or use assisting devices such as glass or projector modifier). "Tunnel Vision" - Visual field less than 10 degrees. Legally blind in both eyes. Definition from Chapter 6, S136, MGL.

BLIND AND DEAF

MISSING EXTREMITIES

One arm - one leg
One hand or arm and one foot or leg
Both hands or arms and one foot or leg
Both hands or arms and both feet or legs
Both feet or legs
One hand or arm and both feet or legs
Both hands or arms

PARTIAL PARALYSIS

(Because of a brain, nerve or muscle problem, including palsy and cerebral palsy, there is some loss of ability to move or use a part of the body, including legs, arms, and/or trunk)

Cont'd

Both hands
Both arms, any part
One side of body, including one arm and one leg
Three or more major parts of the body (arms and legs)
Both legs, any part

OTHER IMPAIRMENTS

Mental retardation (A chronic and lifelong condition involving a limited ability to learn, to be educated and to be trained for useful productive employment as certified by a State Vocational Rehabilitation Agency under Section 213..3102 (t) of Schedule A.)

Convulsive Disorder (e.g., epilepsy)

Mental or emotional illness (a history of treatment for mental or emotional problems.)

Severe distortion of limbs and/or spine (e.g. dwarfism), kyphosis (severe distortion of back).

COMPLETE PARALYSIS

(Because of a brain, nerve or muscle problem, including palsy and cerebral palsy, there is a complete loss of ability to move or use a part of the body including legs, arms and/or trunk).

Both hands
Both arms
Both legs
One arm
One leg
Lower half of body (including legs)
One side of body, (including one arm and one leg)
Three or more major parts of the body (arms and legs)

GROUP B

SPEECH IMPAIRMENTS

Severe speech malfunctions or inability to speak, hearing is normal (Examples: defects of articulation (unclear language sounds), stuttering, aphasia (impaired language function), laryngectomy (removal of the "voice box").

CONT'D

HEARING IMPAIRMENTS

Total deafness in one ear only. Mild to moderately severe hearing impairments in the better ear which may be sufficient to process spoken language through hearing with or without amplification under favorable listening conditions or other auditorily handicapping conditions which significantly interfere with processing of spoken language.

VISION IMPAIRMENTS

Ability to read ordinary size print with glasses, but with loss of peripheral (side) vision (Restriction of the visual field to the extent that mobility is affected - "Tunnel Vision" - visual field reduced to more than 10 degrees). Blind in one eye.

MISSING EXTREMITIES

One hand
One foot

NON PARALYTIC ORTHOPEDIC IMPAIRMENTS

(Because of chronic pain, stiffness or weakness in bones or joints, there is some loss of ability to move or use a part or parts of the body).

One or both hands
One or both legs
One or both arms
One or both feet
Hip or pelvis
Back
Any combination of two or more parts of the body.

PARTIAL PARALYSIS

One hand
One arm, any part
One leg, any part

COMPLETE PARALYSIS

One hand

OTHER IMPAIRMENTS

Heart disease with no restriction or limitation of activity (History of heart problems with complete recovery).

Heart disease with restriction or limitation of activity.

Blood disease (e.g. sickle cell anemia, leukemia, hemophilia)

Controlled diabetes with no restriction of activity.

Diabetes with limitation of activity due to complications such as retinitis, neuritis, etc.

Pulmonary or respiratory disorders (e.g., tuberculosis, emphysema, asthma).

Kidney dis-functioning (e.g., if dialysis (use of an artificial kidney machine is required).

Cancer - A history of cancer with complete recovery.

Cancer - Undergoing surgical and/or medical treatment.

Brain Damage

Learning Disabilities

Disfigurement of face, hands or feet (e.g., distortion of features on skin such as those caused by burns, gunshot injuries, birth defects, gross facial birth marks, club feet, etc.)

GROUP C

The individual (1) has a physical or mental impairment not found in Group A or Group B that substantially limits one or more major life activities or (2) has a record of such impairment. (An individual may not claim protected status for purposes of affirmative action on the ground that he/she is "regarded as having such impairment" but may, on that basis, invoke the protection of state and federal laws prohibiting discrimination on the basis of handicap). "Major life activities" means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, breathing, learning and working.



Pam Kuechler, Executive Director
Steven Ponte, Board President

CONFIDENTIAL

Appendix B-4

CONFIRMATION OF HANDICAPPED STATUS

In accordance with Executive Order #227, the Governor's Code of Fair Practice, and Executive Order #246, Code of Fair Practices for the handicapped and guidelines promulgated by the State Office of Affirmative Action, this document confirms that the employee/applicant named below has self-identified as a handicapped individual and is entitled to the benefits of Affirmative Action protected status. This employee/applicant has provided verification to the Agency named below for purposes of granting this status.

This confirms that:

Ms.
Mrs.
Mr. _____

has provided an authorization signature for purposes of verifying his/her handicap and this verification has been accepted and recorded at:

(NAME OF AGENCY)

By: _____
(AFFIRMATIVE ACTION OFFICER)

(AGENCY HEAD OR DESIGNEE)

Date: _____

INTERVIEWING GUIDELINES

PRE-EMPLOYMENT

During the pre-employment process, a number of questions which have traditionally appeared on application forms or have been posed in interviews regarding a disability are in violation of the regulations of this program and are now strictly prohibited. The following list provides some examples of these prohibited questions which must be eliminated from questionnaires, applications and interviews.

- * "Are you handicapped? If so, to what extent?"
- * "Do you have any job related handicaps that would prevent you from doing the job?"
- * "What is the nature of your disability?"
- * "Have you ever had any of the following conditions...rupture, hernia, arthritis, diabetes, epilepsy?"
- * "Have you ever been rejected for health or life insurance?"
- * "Have you ever received Workmen's Compensation?"
- * "Have you ever been hospitalized?"
- * "Are you now or have you ever been under the care of a physician?"
- * "Do you have any physical or mental handicaps or limitations?"
- * "List any physical defects _____."
- * "Were you injured? Give details _____."
- * "Have you any defects in hearing _____ speech _____ and vision _____?"
- * "Do you have any physical handicaps, disease or other disability which should be considered in assigning you to work?"
- * "Do you have any limitation which would prevent you to perform specific kinds of work or specific schedules?"

Questions concerning an applicant's history of absenteeism, may be suspect if it is determined that they were asked to gain information as to the nature or severity of the handicap of the handicapped individual.

However, employers may make pre-employment inquiry into an applicant's ability to perform job related functions, and may ask whether the person can perform a particular job safely. These inquiries would have to relate to a particular job or job related function. Thus, if a particular job required driving, an employer could ask if the applicant had the appropriate driver's license. An employer could ask if, in the operation of equipment used on a particular job, the applicant had used such equipment, or could test the applicant in the use of that equipment.

During the pre-employment interview, if the applicant, voluntarily self-identifies, he/she will use the form, Appendix A. If the applicant has not voluntarily self-identified for affirmative action, he/she still may request reasonable accommodation. The employer needs to determine whether the person requires the reasonable accommodation to meet the essential functions of the job, and if so, the nature and extent of the accommodation.

GLOSSARY**AFFIRMATIVE ACTION PROTECTED GROUPS:****RACIAL MINORITIES**

ASIAN: All persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent or the Pacific Islands. Areas include China, India, Japan, Korea, the Philippine Islands, and Samoa.

BLACK: All persons having origins in any of the Black racial groups of Africa, or the Cape Verde Islands.

HISPANIC: All persons of Mexican, Puerto Rican, Cuban, Central or South America or other Spanish culture or origin regardless of race.

NATIVE AMERICAN OR ALASKAN NATIVE: All persons having origins in any of the original peoples of North America, who maintain cultural identification through tribal affiliations or community recognition.

WOMEN: Adult female persons.

HANDICAPPED: Any person who has a physical or mental impairment which substantially limits one or more of such person's life functions or has a record of such impairment or is regarded as having such an impairment.

VIETNAM ERA VETERAN: A person who served on active duty for a period of more than 180 days, any part of which occurred between August 5, 1964 and May 7, 1975, and was discharged or released with other than a dishonorable discharge or was discharged or released from active duty for a service connected disability if any part of such active duty was performed between August 5, 1964 - May 7, 1975.

WHITE: All persons having origins in any of the original peoples in Europe, North America or the Middle East. Not of Hispanic origin.

JOB CATEGORY: A grouping or aggregation of similar job classifications for purposes of analysis or official reporting.

AFFIRMATIVE ACTION GRIEVANCE PROCEDURE

SECTION 1

The effective accomplishment of the work of P.A.C.E., Inc. shall promote consideration and adjustment of employee grievances. It is the desire of the Corporation to adjust grievances informally, and both supervisors and employees are expected to make every effort to resolve problems as they arise. However, it is recognized that there will be grievances which will be resolved only after appeal and review. During the process of investigation all parties involved shall be interviewed and said parties will be notified in writing of the final decision.

SECTION 2

An Affirmative Action Grievances is defined as follows:

- A. Claimed violation, misrepresentation, inequitable application, or noncompliance with provisions of any part of the P.A.C.E., Inc. Affirmative Action Plan and Policies.
- B. Claims by, or on behalf of an employee or group of employees of a violation or misrepresentation or inequitable application of existing Corporation policy, laws, order, rules, and regulations applicable to the Corporation.
- C. Disciplinary Action including discharges.

SECTION 3

All grievances shall be brought to the attention of the appropriate individual as provided in Section 11, Step 1 of this policy, not to exceed ten (10) working days after the aggrieved employee (or employees) know or should have known of the facts or conditions on which the grievance is based or the grievance shall be considered waived.

SECTION 4

No grievance shall be considered under the grievance procedure unless it is presented as provided below. A grievance must be appealed to the next step as provided below or the grievance will be considered waived on the basis of the last answer given. If a grievance is once settled in any of the following steps, it shall be considered closed and shall not thereafter be subject to the grievance procedure.

SECTION 5

The employee's or employees' statement of grievance as required below must contain a) a statement of facts surrounding the grievance, b) the provision(s) of the personnel policy that is the subject of the grievance, c) the policy, law, order, rules, and regulations of P.A.C.E., Inc. that

is the subject of the grievance, the relief requested, and the extent to which the grievant has sought an informal adjustment of the grievance.

SECTION 6

An employee who is disciplined or discharged shall forward the grievance to the Affirmative Action Officer not to exceed fifteen (15) working days after the aggrieved employee knows or should have known of the facts or conditions on which the grievance is based or the grievance shall be considered waived. The Affirmative Action Officer shall then convene and Ad Hoc Committee consisting of one supervisor, one peer to the complainant, and the Affirmative Action Officer to review the grievance. The persons serving on this committee shall meet with the agreement of all parties involved as is possible. The committee will meet with the employee not to exceed five (5) working days from the date the grievance is filed. A recommendation shall be made to the Executive Director and the employee shall receive a written decision not to exceed ten (10) working days after meeting with the employee. The employee may appeal this decision per P.A.C.E. Policy beginning at Section 11, Step 3.

SECTION 7

An employee who has filed a grievance in accordance with provisions of Article IV shall be granted time off with pay to attend the grievance hearing.

SECTION 8

The Personnel/Affirmative Action Committee or the Board of Directors have the sole discretion whether appeals will be decided on a written record or be heard, except that in the case of an appeal relative to discipline or discharge the appeal will be heard.

SECTION 9

On all grievances, an employee may represent him/herself or be represented by a person of his/her choice.

SECTION 10

The time periods set forth in this Article IV may be modified by agreement.

SECTION 11

STEP 1: An employee who has a grievance must take up the grievance with his/her immediate supervisor verbally before he/she can process the complaint as a formal complaint.

STEP 2: If the employee is not satisfied with the response then he/she must file a written

grievance with the Affirmative Action Officer per P.A.C.E. policy. The Affirmative Action Officer will meet with the employee not to exceed five (5) working days from the day the grievance is filed. The Affirmative Action Officer will submit a written recommendation for resolution of the grievance to the Executive Director who will then approve the recommendation or issue a statement of resolution of his/her opinion based on the facts of the grievance. A written statement of resolution shall be given to the employee not to exceed ten (10) working days from the first meeting with the Affirmative Action Officer.

STEP 3: The employee, not to exceed ten (10) working day after receipt of the Executive Director's decision, may appeal the Executive Director's decision to the Personnel/Affirmative Action Committee or the Board.

Appeals to the Personnel/Affirmative Action Committee must be made in writing reciting the matters submitted to the Executive Director. A copy of the employee's written appeal shall be submitted to the Executive Director.

STEP 4: The Personnel Committee shall act upon the appeal within a period not to exceed ten (10) working days from the receipt of the appeal and shall communicate its written decisions to the employee and the Executive Director within that period.

STEP 5: The employee or Executive Director may appeal the decisions of the Personnel Committee's to the Board of Directors no later than ten (10) working days after the receipt of the Personnel Committee's decision; and unless the Personnel Committee's decision is appealed to the Board of Directors within that period, the Personnel Committee's decision will be final.

STEP 6: The Board of Directors shall act upon the appeal within a period not to exceed ten (10) working days from the receipt of the appeal and shall communicate its written decision to the employee and the Executive Director within that period. The decision of the Board of Directors is final.

SECTION 12

In the event that a grievance filed by an employee who has been suspended or discharged is found in favor of that employee, said person shall receive their pay retroactively to the effective date of suspension or termination and in the case of discharge immediately reinstated in their position.