

IRON RANGE
Resources

Advancing regional growth.



Iron Range Resources

**Affirmative Action Plan
Fiscal Year 2006-2008**

Table of Contents

TRANSMITTAL FORM.....	2
COMMISSIONER'S COMMITMENT.....	4
RESPONSIBILITY STATEMENT.....	5
COMMUNICATIONS.....	7
INTERNAL HARASSMENT/DISCRIMINATION COMPLAINT PROCEDURE.....	8
COMPLAINT OF HARASSMENT/DISCRIMINATION.....	10
HARASSMENT/DISCRIMINATION POLICY.....	11
IRON RANGE RESOURCES ANNUAL AFFIRMATIVE ACTION GOALS.....	13
RECRUITMENT PLAN.....	14
RETENTION PLAN.....	16
IRON RANGE RESOURCES PROGRAM OBJECTIVES.....	17
AUDITING AND REPORTING SYSTEM.....	19
REASONABLE ACCOMMODATION.....	21
EMPLOYEE REQUEST FOR REASONABLE ACCOMMODATION.....	25
REASONABLE ACCOMMODATION AGREEMENT.....	26
WEATHER EMERGENCIES.....	27
BUILDING EVACUATION.....	27

TRANSMITTAL FORM
 IRON RANGE RESOURCES
 FISCAL YEAR 2006-2008

1. This annual review revealed underutilization of the following protected group(s) in the following goal units:

GOAL UNITS	PROTECTED GROUPS		
	WOMEN	MINORITIES	DISABLED
OFFICIALS & ADMINISTRATORS			X
PROFESSIONALS	X	X	X
OFFICE CLERICAL		X	X
SKILLED CRAFT			X
SERVICE MAINTENANCE	X	X	X

2. This annual plan is and will be posted at the following central locations so that every employee is aware of the agency's commitments in affirmative action for the year.

- Eveleth Administration Building (Office and Shop)
- Giants Ridge Golf & Ski Resort (Office and Shop), Biwabik
- Ironworld Discovery Center, Research/Interpretative Center and Mineland Reclamation, Chisholm

3. This annual plan contains an internal procedure for processing complaints of alleged discrimination from employees, and each employee has been apprised of this procedure as well as our department's affirmative action goals for this fiscal year.




 Affirmative Action Officer

7-31-06

 Date

4. This annual plan contains clear designations of those persons and groups responsible for implementing the attached affirmative action plan as well as my personal statement of commitment to achieving the goals and timetables described herein.



 Agency Head

7/31/06

 Date

5. This annual plan meets the rules governing affirmative action, Statutory Authority 43A.04, and contains goals and timetables as well as methods for achieving them which are reasonable and sufficiently aggressive to deal with the identified disparities.

 State Affirmative Action Officer

 Date

COMMISSIONER'S COMMITMENT

As Commissioner of Iron Range Resources, I want to take this opportunity to state unequivocally my commitment to a policy of equal opportunity and affirmative action in employment. Discrimination or harassment toward any person or persons will not be tolerated.

Iron Range Resources is committed to providing equal opportunity and affirmative action to all persons without regard to race, creed, color, sex, sexual orientation, national origin, age, marital status, disability, status with regard to public assistance, membership or activity in a local commission or religion. The agency will further strive to ensure equal access and opportunity in the services it provides to the public. The agency will continue to actively promote a program of affirmative action, wherever minorities, women and persons with disabilities are not fairly represented in the workforce.

It is my responsibility to ensure that Iron Range Resources provides equal opportunity in employment to both current and prospective employees in accordance with the above. All agency standards, policies and procedures will be reviewed periodically in order to identify and eliminate any barriers to equal employment opportunity within the existing systems.

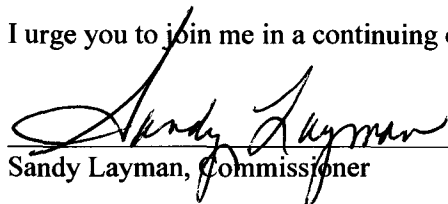
I endorse and support implementation of the State's Affirmative Action Program and our agency's Affirmative Action Plan. Our State Legislature has designated three protected groups. They are racial/ethnic minorities, women and persons with disabilities. We will make every effort to recruit and hire qualified protected group members where they are under represented. We will make every effort to affirmatively retain protected group employees.

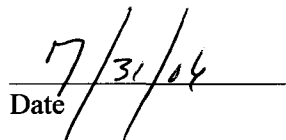
I have designated Jean Dolensek to serve as our Affirmative Action Officer. Our plan is posted on all division bulletin boards and is available to all employees. The primary responsibility for implementation of this policy falls to each manager and supervisor as well as the Affirmative Action Officer. Personnel with this responsibility will continue to be trained within this area.

As part of our Affirmative Action Program, we are also committed to preventing sexual harassment and providing a work environment free of harassment, which is a form of discrimination. In order to ensure this type of environment, training is provided to all employees. Included in our plan are procedures to follow in the event of any type of harassment.

Included within, is our plan that emphasizes positive active steps, and objectives needed to bring about change rather than a passive attitude of simple non-discrimination. While our agency has very little employment turnover, we do continue to set goals and objectives in order to reduce disparities. The following plan will achieve Iron Range Resources' affirmative action objectives.

I urge you to join me in a continuing effort to make equal employment opportunity a reality.


Sandy Layman, Commissioner


Date

RESPONSIBILITY STATEMENT

COMMISSIONER

Responsibilities: Direct the agency's affirmative action program in compliance with existing federal and state laws, rules and regulations.

Duties:

1. Appoint or designate an Affirmative Action Officer.
2. Make decisions and changes in policy, procedures, and accommodations of persons with disabilities as may be needed to facilitate equal opportunity and affirmative action progress.
3. Take action on complaints of alleged discrimination.
4. Report annually to the Commissioner of Employee Relations the agency's progress in affirmative action.

Accountability: To the Governor directly and to the Commissioner of Employee Relations indirectly.

AFFIRMATIVE ACTION OFFICER

Responsibilities: Direct and implement Iron Range Resources' affirmative action program.

Duties:

1. Write and update the agency's affirmative action plan.
2. Monitor the plan.
3. Provide the Office of Diversity and Equal Opportunity with status reports, as required.
4. Implement the pre-employment review process and complete the Protected Group Report.
5. Investigate alleged charges of discrimination and report a summary of findings to the agency head.
6. Disseminate information to managers, supervisors, employees and applicants.
7. Seek out and advertise agency vacancies to protected group resources.
8. Develop and implement policies and procedures related to affirmative action.

Accountability: Iron Range Resources Commissioner/Deputy Commissioner

MANAGERS AND SUPERVISORS

Responsibilities: Ensure compliance with the agency's affirmative action plan and employment opportunity for all employees

Duties:

1. Assist the Affirmative Action Officer in identifying and resolving problems and eliminating barriers which inhibit equal employment opportunity, including providing reasonable accommodations for applicants and employees.
2. Follow the pre-employment review process.
3. Communicate the agency's affirmative action plan to all employees.
4. Ensure new policies and procedures are distributed to each employee and a review process is established.

Accountability: Iron Range Resources Commissioner/Deputy Commissioner

COMMUNICATIONS

INTERNAL DISSEMINATION

- The affirmative action plan is posted on agency official bulletin boards.
- The Affirmative Action Officer will provide information to employees as needed to inform them of any changes to the policies and procedures.
- The Affirmative Action Officer will provide a copy of equal employment opportunity and affirmative action information to new employees.

EXTERNAL DISSEMINATION

- The phrase "An Equal Opportunity Employer" will be included on agency letterhead and on all advertisements for employment and included on the agency website.
- The Affirmative Action Officer is accountable for seeking out and advertising agency vacancies to protected group resources.

INTERNAL HARASSMENT/DISCRIMINATION COMPLAINT PROCEDURE

Iron Range Resources has established the following discrimination complaint procedure to be used by all employees, applicants or eligibles. Coercion, reprisal or intimidation against anyone filing a complaint or serving as a witness under this procedure is prohibited.

RESPONSIBILITY OF EMPLOYEES

All employees shall respond promptly to any and all requests by the Affirmative Action Officer for information and for access to data and records for the purpose of enabling the Affirmative Action Officer to carry out responsibilities under this complaint procedure.

WHO MAY FILE

Any employee, applicant or eligible of Iron Range Resources who believes that she/he has been discriminated against by reason of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, sexual orientation or age may file a complaint. Employees who are terminated are encouraged to file their internal complaint prior to their actual separation; however, complaints will be taken for a reasonable period of time subsequent to the actual separation date.

THE COMPLAINT PROCEDURE

The internal complaint procedure provides a method for resolving complaints involving violations of Iron Range Resources' nondiscrimination policy within the agency. Any employee, applicant or eligible is encouraged to use this internal complaint process. Retaliation against a person who has filed a complaint either internally or through an outside enforcement agency or other legal channels is prohibited. The Affirmative Action Officer may contact the Office of Diversity and Equal Opportunity if she/he wants information about filing a complaint.

FILING PROCEDURES

1. The employee, applicant or eligible completes the *Complaint of Discrimination Form* provided by the Affirmative Action Officer. Employees are encouraged to file a complaint within a reasonable period of time after the individual becomes aware that a situation(s) may involve discriminatory harassment. The Affirmative Action Officer will, if requested, provide assistance in filling out the form.
2. The Affirmative Action Officer determines if the complaint falls under the purview of Equal Employment Opportunity law, i.e., the complainant is alleging discrimination or harassment on the basis of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, sexual orientation or age; or if the complaint is of a general personnel concern.
 - a. If it is determined that the complaint is not related to the discrimination, but rather to general personnel concerns, the Affirmative Action Officer will inform the complainant, in writing, within ten (10) working days.
 - b. If the complaint is related to discrimination, the Affirmative Action Officer will, within ten (10) working days, contact all parties named as respondent(s) and outline the basic facts of the complaint. The respondent(s) will be asked to provide a response to the allegations within a specific period of time.

FILING PROCEDURES CONTINUED

3. The Affirmative Action Officer shall investigate the complaint. At the conclusion of the investigation, the Affirmative Action Officer shall notify the complainant(s) and respondent(s) that she/he has completed the investigation. The Affirmative Action Officer shall subsequently review the findings of the investigation.
 - a. If there is sufficient evidence to substantiate the complaint, appropriate action will be taken.
 - b. If insufficient evidence exists to support the complaint, a letter will be sent to the complainant(s) and the respondent(s) dismissing the complaint.
4. After the complaint(s) is filed, a written answer will be provided to the parties within sixty (60) days. Should extenuating circumstances prevent completion of the investigation, the complainants also will be notified within sixty (60) days.
5. The complaint will be filed with the Commissioner of the Minnesota Department of Employee Relations within thirty (30) days of final determination.
6. All documentation associated with a complaint shall be considered investigative data under the Minnesota Government Data Practices Act. The status of the complaint will be shared with the complainant(s) and respondent(s). After an investigation is compiled and all appeals are exhausted, all documentation is subject to the provisions of the Minnesota Government Data Practices Act.
7. All data collected may become evidence in civil or criminal legal proceedings pursuant to state or federal statutes. An investigation may include, but is not limited to, the following types of data:
 - a. Interviews or written interrogatories with all parties involved in the complaint, e.g., complainant(s), respondent(s) and their respective witnesses; officials having pertinent records or files, etc.
 - b. All records pertaining to the case i.e., written, recorded, filmed or in any other form.
8. The Affirmative Action Officer shall maintain records of all complaints and any pertinent information or data for three (3) years after the case is closed.

COMPLAINT OF HARASSMENT/DISCRIMINATION

Please read before completion of the form

Any complaint of harassment/discrimination is considered confidential data under Minnesota Statute 13.39, Subd. 1 and 2. This information is being collected for the purpose of determining whether harassment/discrimination has occurred. You are not legally required to provide this information, but without it, an investigation cannot be conducted. This information may only be released to the Affirmative Action Officer, the complainant, the respondent and appropriate personnel.

Complainant (you)		
Name:		Job Title:
Work Address:	City, State, Zip:	Telephone:
Agency:	Division:	Manager:
Respondent (person who harassed/discriminated against you)		
Name:		Job Title:
Work Address:	City, State, Zip:	Telephone:
Agency:	Division:	Manager:
The Complaint		
Basis of Complaint ("X" all that apply)		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> Disability
<input type="checkbox"/> Sex	<input type="checkbox"/> Creed	<input type="checkbox"/> Marital Status
<input type="checkbox"/> Age	<input type="checkbox"/> Religion	<input type="checkbox"/> National Origin
		<input type="checkbox"/> Sexual Orientation
		<input type="checkbox"/> Status with Regard to Public Assistance
		<input type="checkbox"/> Membership or Activity in a Local Human Rights Commission
Date most recent act of harassment/discrimination took place:		
If you filed this complaint with another agency, give the name of that agency:		
Describe how you believe that you have been harassed/discriminated against (names, dates, places, etc.). Use a separate sheet of paper if necessary and attach to form.		
Information On Witnesses Who Can Support Your Case		
Name	Work Address	Work Telephone
1.		
2.		
3.		
<i>Additional witnesses may be listed in "Additional Information" or on a separate sheet attached to this form.</i>		
This complaint is being filed on my honest belief that the State of Minnesota has harassed/discriminated against me. I hereby certify that the information I have provided in this complaint is true, correct and complete to the best of my knowledge and belief.		
Complainant Signature:		Date:
Affirmative Action Officer Signature:		Date:

Please return form to: Iron Range Resources, Affirmative Action Officer, PO Box 441, Eveleth, MN 55734

HARASSMENT/DISCRIMINATION POLICY

STATEMENT OF POLICY

It is the policy of Iron Range Resources to prohibit harassment of its employees based on race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, sexual orientation or age. This prohibition with respect to harassment includes both overt acts of harassment and those acts that create a negative work environment. Any employee subjected to such harassment should file a complaint internally with Iron Range Resources' Affirmative Action Officer. If the employee chooses, she/he may file a complaint externally with the Minnesota Department of Human Rights, the Equal Employment Opportunity Commission, or through other legal channels. These agencies have time limits for filing complaints, so individuals should contact the agencies for more information. In extenuating circumstances, the employee should contact the Office of Diversity and Equal Opportunity at the Minnesota Department of Employee Relations for information regarding the filing of a complaint. Any unintentional or deliberate violation of the policy by an employee will be cause for appropriate disciplinary action.

Each employee is responsible for the application of the policy. This includes initiating and supporting programs and practices designed to develop understanding, acceptance, commitment and compliance within the framework of this policy. All employees must be informed that harassment is unacceptable behavior. The Affirmative Action Officer will be expected to keep Iron Range Resources and its employees apprised of any changes in the law or its interpretation regarding this form of discrimination. The Affirmative Action Officer is also responsible for:

- Notifying existing and new employees of this policy
- Informing all employees of the complaint procedure and ensuring that all complaints will be investigated promptly and carefully

DEFINITIONS

Discriminatory harassment is any behavior based on protected class status which is not welcome, which is personally offensive, which, therefore, may affect morale and interfere with the employee's ability to perform. For example, harassment based on national origin has been defined by the U.S. Equal Employment Opportunity Commission as "Ethnic slurs and other verbal or physical conduct relating to an individual's national origin."

Sexual harassment had also been specifically defined by the Minnesota Human Rights Act, which state in regard to employment, that:

"Sexual harassment" includes unwelcome sexual advances, request for sexual favors, sexually motivated physical contact or other verbal or physical conduct, communication of a sexual nature when:

- (1) submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of obtaining employment;***
- (2) submission to or rejection of that conduct or communication by an individual is used as a factor in decision affecting that individual's employment; or***
- (3) that conduct or communication has the purpose or effect of substantially interfering with an individual's employment and in the case of employment, the employer knows or should know of the existence of the harassment and fails to take timely and appropriate action.***

It is possible for discriminatory harassment to occur: 1) among peers or coworkers, 2) between managers and subordinates, or 3) between employees and members of the public. Employees who experience discriminatory harassment should bring the matter to the attention of the Iron Range Resources' Affirmative Action Officer.

In fulfilling our obligation to maintain a positive and productive work environment, the Affirmative Action Officer and all employees are expected to address or report any suspected harassment or retaliation.

Varying degrees of discriminatory harassment violations can occur and require varying levels of progressive discipline. Individuals who instigate harassment are subject to serious disciplinary actions up to and including suspension, demotion, transfer or termination. Additionally, inappropriate behaviors that do not rise to the level of discriminatory harassment, but are nonetheless disruptive, should be corrected early and firmly in the interests of maintaining a barrier free work place. Individuals who participate in inappropriate behaviors at work are also subject to disciplinary actions.

PROCEDURE

Any employee or applicant of Iron Range Resources who believes that she/he has experienced discrimination or harassment based on her/his race, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, sexual orientation or age may file a complaint of discrimination.

Complaints of discrimination or harassment can be filed using the internal discrimination complaint procedure included in the Iron Range Resources' Affirmative Action Plan.

IRON RANGE RESOURCES ANNUAL AFFIRMATIVE ACTION GOALS

Fiscal Year 2006-2008

Job Group	Anticipated New Hires	Hiring Goals
Officials & Administrators	0	0
Professional	4	4
Technical	0	0
Office/clerical	0	0
Skilled Craft	0	0
Service Maintenance	0	0

The above goals are based upon the approval of Iron Range Resources' budget as originally submitted. If the agency's budget is not approved as submitted, the above positions will be filled as vacancies occur in other groups.

According to the utilization analysis on page 28, the agency's workforce is underutilized in the Professionals job group by five women, three disabled and three minorities. Based on conditions in the agency, we expect this job group to grow in the next two years but do not anticipate growth that would allow us to set a goal to include all women, disabled and minorities that we are underutilized. Should more openings occur, we will make a good faith effort to correct the underutilization by recruiting and hiring from the protected groups for those vacancies.

The agency also hires approximately 25-30 temporary employees each summer at the Ironworld facility and approximately 45-50 temporary employees each winter at the Giants Ridge facility. The majority of these employees are student workers or interns and are interviewed and selected according to the state guidelines. It is the agency's goal to hire affirmatively when filling these positions.

RECRUITMENT PLAN

AGENCY POLICY

Iron Range Resources is committed to achieving a balanced workforce that is representative of the community. The agency will actively recruit protected group members in the area where there are disparities. The agency is committed to partnering with protected group communities to ensure recruitment goals and objectives.

PROJECTED HIRING GOALS

It is projected that for 2006 and 2007, Iron Range Resources will hire two full-time permanent employees. It is the agency's goal to hire affirmatively and will use the following as a plan of action.

UNDERUTILIZATION

This annual review revealed underutilization of the following protected group(s) in the following goal units:

Goal Units	Protected Groups		
	Women	Minorities	Disabilities
Officials & Administrators			X
Professionals	X	X	X
Office/Clerical		X	X
Skilled Craft			X
Service Maintenance	X	X	X

RECRUITMENT PLAN

The recruitment plan is developed annually in conjunction with the agency's budget process. When recruitment is required, special effort will be made to ensure that qualified applicants of underutilized, protected groups are interviewed.

The agency will partner with the Minnesota Department of Employee Relations and its recruitment efforts.

At the time of interview, the agency generally uses interview teams of at least two individuals. Composition of the interview team is dependent on the position. The Human Resources Director is an interview team member for all permanent positions. A formal interview plan and process is followed.

ADVERTISING

Iron Range Resources has very little turnover; therefore, the agency advertising budget and expenses are minimal. The method of advertising is based on the type of position that is vacant. In most cases, the agency does not advertise, as there are eligible lists available from the Minnesota Department of Employee Relations. If no list is available, a new position is created, or the agency is hiring a temporary or temporary unclassified position, the agency will advertise. Advertising is usually done in local and Duluth newspapers. Occasionally, the agency advertises state-wide and in those instances it utilizes Minneapolis and St. Paul newspapers and various tourism magazines. We also utilize the agency website.

The agency does hire temporary workers, student workers and interns to work at our Giant Ridge and Ironworld facilities, and from time to time at our Eveleth Administration Building. As we attempt to fill these positions, letters are written to all local colleges and Job Service Offices. Applications for the positions are also enclosed with the letters.

INTERNSHIP AND STUDENT WORKER PROGRAM

The internship work experience is directly related to a specific academic program of an educational institution. The purpose of the Internship Program is to provide learning opportunities for students and to develop relationships with institutions of higher education. Interns will be provided with an opportunity to earn academic credit and/or work experience while performing a valuable service to the agency.

Internship Position and Duties

Human Resources will formalize, implement and communicate a Student Internship Program. Any division within the agency may request an intern. Prior to requesting an intern, a division must develop a work plan including the individual responsible for supervision of the intern.

Recruitment and Selection

The recruitment and selection of interns is the responsibility of the supervisor working through the Internship Program Coordinator. The criteria for selection are:

- The intern is a student at an educational institution
- The intern is either getting academic credit for the internship or work experience in his/her area of study
- The intern must be in good standing academically at his/her educational institution

Review, Monitor and Evaluation of Internship

The supervisor is responsible for monitoring and evaluating the intern and his/her internship experience.

STUDENT WORKER PROGRAM

The Student Worker Program is utilized throughout the agency; however, most of the student workers are hired at Giants Ridge Golf & Ski Resort and Ironworld Discovery Center.

Student Worker Position and Job Duties

Each Division which requests a Student Worker position must have approval from Human Resources of the number of students they are requesting and a brief description of the duties along with approximate starting and ending dates.

Recruitment and Selection Process

Human Resources will write letters to all local educational institutions requesting interested students to apply. Letters also are sent to local Job Service offices. All applications are sent to the Human Resources for review and assurance of eligibility as per state guidelines. The applications are then sent to various divisions. Divisions are always reminded of Affirmative Action goals and objectives.

Evaluation of Student Workers

All supervisors are required to complete a student worker evaluation form at the end of the student's appointment.

FUTURE IRON RANGE RESOURCES RECRUITMENT EFFORTS

Iron Range Resources will let it be known through external dissemination that it is an equal opportunity employer. Recruitment resources are available from the Minnesota Department of Economic Security, the Minnesota State Council on Disability and the President's Committee on Employment of People with Disabilities. Recruitment will be based on talents, skills and abilities.

RETENTION PLAN

As stated previously, Iron Range Resources has little employee turnover. However, to implement its coordinated retention plan, the agency's Human Resources will initiate the following activities:

SPECIFIC ACTION STEPS - HUMAN RESOURCES DIRECTOR

1. Conduct an analysis of separation and promotion patterns to determine the impact on protected group members.
2. Conduct a survey of system office programs that may enhance protected class retention.
3. Provide affirmative action, sexual harassment training and ADA training, etc. Training is conducted by Human Resources staff or an outside source.
4. Provide development opportunities for employees by attendance at training seminars and workshops. Make information available regarding tuition reimbursement opportunities for staff.
5. Keep record of all training, participants, etc.
6. Keep record of all non-list hires.

ASSIGNMENT OF RESPONSIBILITY

The Human Resource director is responsible to coordinate and implement the entire Recruitment/Retention Plan; however, it is the responsibility of all managers and supervisors to comply with all provisions of the Affirmative Action Plan.

Target dates for completion are an ongoing, continuous process.

SEPARATION/LAYOFF PATTERNS

Iron Range Resources does not anticipate any layoffs in the near future; however, we have had separation of employees. Separation was due to retirements, resignations, temporary student workers and temporary workers.

2005 Legislation allowed for an Early Separation Incentive Program to be offered to Iron Range Resources employees. The early separation was available between September 1, 2005 and June 30, 2006. Nine eligible employees accepted the package; one professional employee was in a protected group.

Each year we hire approximately 70-80 student workers, student interns and temporary workers. These employees are terminated at the end of our seasonal operations. In the last year, the following protected group members were separated:

- 1 - Student Worker (disabled)
- 1 - Professional (women)

IRON RANGE RESOURCES PROGRAM OBJECTIVES

The objective of the Affirmative Action Plan is to identify discriminatory employment practices within the agency's personnel system and to develop specific action steps, or methods, for eliminating these barriers to equal employment opportunity and to meet affirmative action goals.

The following are specific Iron Range Resources Program Objectives, responsibility and target dates:

OBJECTIVE:

To provide training, review and briefing to supervisors and managers.

SPECIFIC ACTION STEPS:

1. Provide review and briefing of entire Affirmative Action Plan to all supervisors and managers.
2. Conduct review and briefing sessions to all supervisors and managers on handling harassment and discrimination complaints.
3. To continually provide and distribute pertinent information relating to affirmative action/equal opportunity to all supervisors and managers.
4. To conduct review and training sessions on new policies, such as Zero Tolerance for Violence in the Workplace.
5. To provide training on dealing with complaints, coaching, discipline and grievances.

ASSIGNMENT OF RESPONSIBILITY:

Human Resources Director

TARGET DATE FOR COMPLETION:

December 2007 -- Some action steps are continuous

OBJECTIVE:

To keep supervisors, managers and employees apprised of current changes, issues, and other relevant information concerning affirmative action, equal employment opportunity and protected group members.

SPECIFIC ACTION STEPS:

1. Provide an update on affirmative action program to all supervisors and employees.
2. To conduct review and training sessions on new policies, such as Zero Tolerance for Violence in the Workplace.
3. Assure information on affirmative action is disseminated to all employees.
4. Provide input and information regarding affirmative action at agency/planning meetings.
5. Schedule training, meetings, etc., related to affirmative action.

ASSIGNMENT OF RESPONSIBILITY:

Human Resources Director, Managers and Supervisors

TARGET DATE FOR COMPLETION:

Continuous

Iron Range Resources Program Objectives continued

OBJECTIVE:

To assure that all provisions of the agency's Affirmative Action Plan are implemented and that a work environment is provided free of harassment.

SPECIFIC ACTION STEPS:

1. Meet with staff regularly to ensure that staff understands the objective.
2. Keep informed of affirmative action goals and assure support, implementation and application of programs.
3. Take appropriate action if provisions of Affirmative Action are violated.

ASSIGNMENT OF RESPONSIBILITY:

Managers and supervisors of the agency are responsible for the supervision of employees and for the above steps.

TARGET DATE FOR COMPLETION;

Continuous

OBJECTIVE:

To actively recruit disabled, minority and female candidates to apply for positions in the State Service.

SPECIFIC ACTION STEPS:

1. Sponsor a Student Worker Program and actively seek protected group applicants for this program and encourage applicants to consider State service as a career.
2. Sponsor an Internship Program and actively seek protected group applicants for this program and encourage applicants to consider State service as a career.
3. Contact various educational institutions and inform them of agency programs and also request assistance in encouraging protected group applicants.
4. Schedule meetings and training as necessary and required.

ASSIGNMENT OF RESPONSIBILITY:

Supervisors, Managers and Human Resources Director

TARGET DATE OF COMPLETION:

December 2007

AUDITING AND REPORTING SYSTEM

An affirmative action program needs an internal auditing, evaluation and reporting system to monitor effectiveness. The following reporting and auditing system will be utilized by Iron Range Resources:

GENERAL:

The following internal reports provide the tools to analyze and measure the affirmative action program's effectiveness.

- Quarterly report of all eligible list hires, non-eligible list hires, terminations and discharges, including the job classification, bargaining unit, racial/ethnic group, sex and disability.
- List of all disciplinary actions taken during the past quarter including the name, job classification, bargaining unit, racial/ethnic group, sex and disability.
- List of all recruitment resources used and a record of recruitment strategies and the results used to help fill specific vacancies for which there was under-representation.
- List of formal discrimination complaints filed in the past quarter.
- List of training provided to employees. These records are analyzed for upward mobility impact. This should include job assignment, job progression, promotion, transfer by job classification, bargaining unit, racial/ethnic group, sex and disability.

STATISTICAL REPORTS:

The following statistical reports are analyzed to provide evaluation of program performance.

- Quarterly employee rosters, cross-tabulations, and the Goal Achievement and Special Handling Report as provided by the Equal Opportunity Division.
- An analysis of agency performance in meeting its goals that includes a comparison with previous quarters.
- Copies of all protected group reports and an ongoing analysis of agency compliance.

AFFIRMATIVE ACTION PLAN REVIEW:

- A report of progress and completion of action oriented objectives.
- Status reports as requested by the Office of Diversity and Equal Opportunity.

PRE-EMPLOYMENT REVIEW:

The pre-employment review process makes it possible to track all opportunities to hire when a vacancy occurs in a goal unit that has a disparity.

When the Minnesota Department of Employee Relations Resumix System compiles a list of eligibles, the "Protected Group Report" indicates which groups are under-represented. The report identifies each eligible by racial/ethnic group, sex and disability if indicated by applicant. In other situations, such as temporary workers, student workers and interns the Human Resources Director will identify disparities.

In order to fulfill the goals of affirmative action, the procedure laid out below will be followed when hiring is contemplated:

CONSULTATION WITH SUPERVISORS/MANAGERS:

Managers/supervisors will be kept advised of the goals for the various occupational categories under their supervision by the Affirmative Action Officer.

When a vacancy occurs in a goal unit with unmet affirmative action goals, the procedure below is followed:

The Affirmative Action Officer notifies the supervisor of the unmet affirmative action goal(s) and advises him/her of the affirmative action responsibility. Listed below is the hiring procedure when a disparity exists.

SELECTION PROCESS:

1. A position analysis will be completed for the vacant job. The Human Resources Director and the supervisor/manager will determine the necessary job related criteria: knowledge, skills and abilities.
2. The Human Resources Director determines whether any bargaining unit employees are eligible to bid on the position. If so, the job will be posted for the required length of time. If an employee bidding on the job is successful, the job will be filled in accordance with the respective bargaining agreement.
3. The Human Resources Director determines whether an appropriate certification list exists or if a job announcement is in order.
4. If a job announcement is in order, the agency, using the Resumix System, will recruit affirmatively for the position.
5. Using the certification list, the Human Resources Director and the hiring manager/supervisor will invite all eligible protected group persons for an interview. Invitations will be issued by telephone calls and/or letters sent by mail.
6. The applications/resumes of those interviewed will be compared to the qualifications stated in the job announcement. Candidates will be compared on qualifications and the responses given in their interviews, keeping in mind the affirmative action goals based on agency disparities.
7. Prior to selection of a candidate, the manager/supervisor will discuss his or her anticipated selection with the Affirmative Action Officer to ascertain that the selection is consistent with agency's affirmative action goals.

REASONABLE ACCOMMODATION

State and federal laws such as the Minnesota Human Rights Act, the ADA, and Section 504 of the Rehabilitation Act require employers to make reasonable accommodation to the physical or mental limitations of a qualified applicant with a disability or an employee with a disability seeking promotion, unless the accommodation would impose an undue hardship on the employer.

POLICY

It is the policy of this agency to encourage the employment and promotion of any qualified person including those with disabilities. If the reason for the denial of employment or advancement in employment is the need to make reasonable accommodations to the physical or mental needs of the employee with a disability, job applicant, or employee seeking promotion, it must be demonstrated that: a) the accommodation would impose an undue hardship on the agency; b) the accommodation does not overcome the effects of the person's disability, or c) the person with a disability is not qualified to perform that particular job. Iron Range Resources' reasonable accommodations policy applies to all agency employees with any known physical or mental limitations, and any job applicant requesting accommodation prior to employment interview.

This agency will provide accommodations to qualified employees/job applicants with disabilities or employees seeking promotion when such accommodations are directly related to performing a job or competing for a job on an equal basis. Accommodations will not be required for non-job related personal needs of individuals even though they may be a qualified individual with a disability. In such cases, questions may arise as to whether the accommodation is personal or job related. The primary factors in evaluating an accommodation is whether the accommodation will enable the person to perform the job on an equal basis in the most cost effective manner and in the most integrated setting possible.

Transportation to and from work is the responsibility of the employee. This agency will not provide transportation to and from work as part of the reasonable accommodation.

SCOPE

This policy statement establishes the agency's work force standard for accommodation to the needs of job applicants with disabilities, current employees with disabilities, and employees with disabilities seeking promotion. Reasonable accommodation applies not only to selection and placement, but also to recruitment, training, promotion and reassignment.

DEFINITIONS

For purposes of determining eligibility for reasonable accommodation, an individual with a disability is a person who has a physical or mental impairment that substantially or materially limits one or more major life activities.

To be reasonable, an accommodation should be necessary, effective and related to the job.

1. Employers are required to provide reasonable accommodations unless it would impose an undue hardship as detailed herein.

REQUEST FOR REASONABLE ACCOMMODATIONS

In order to avoid processing delays, the procedures for processing requests for reasonable accommodations should reflect the least number of approval steps necessary. The steps in requesting reasonable accommodations for current employees and employees seeking promotion are as follows:

1. The supervisor and the employee with a disability consult to determine the need for the accommodation and to discuss alternatives such as job restructuring, job site modification and assistant devices.
2. The supervisor submits the *Employee Request for Reasonable Accommodation* form obtained from the Affirmative Action Officer. The request includes a justification for the accommodation and includes a statement of the functional limitations. The supervisor submits the request to the Affirmative Action Officer within five (5) working days upon receipt of the request.

REQUEST FOR REASONABLE ACCOMMODATIONS CONTINUED

3. The Affirmative Action Officer will notify the Commissioner of the request and gather information regarding availability and cost within ten (10) working days.
4. The Affirmative Action Officer reports to the Commissioner with a recommendation. The agency head considers the available alternatives and decides whether or not to grant the requested accommodation and determines what accommodation should be made. The decision is then provided in writing to the supervisor within five (5) working days after the agency head makes his/her determination.
5. The Affirmative Action Officer fills out the Reasonable Accommodations Agreement and obtains necessary signatures.
6. The Affirmative Action Officer submits appropriate purchasing documents to the purchasing agent if equipment, furniture or other assistive devices must be purchased.

METHODS OF PROVIDING REASONABLE ACCOMMODATION

The following are some methods of providing reasonable accommodations to qualified individuals with disabilities. Other forms of reasonable accommodation may also be provided.

Modification Of Equipment Or Assistive Devices:

The provision of equipment may include special telephone equipment, "talking" calculators, one-handed typewriters, closed circuit televisions, specifically designed desk and files, TDD communications equipment and other types of equipment to facilitate the performance of job duties. These items may include: off the shelf devices as well as highly specialized, customized and/or prescription items.

Job Site Modification:

The planning and provisions of accessibility to existing facilities may be required in order for individuals with disabilities to work in them. Modifications may include adjustments to equipment height, including desk, chairs, etc., addition of electrical outlets, rearrangement of furniture and equipment, widening doorways, relocation of the job site to an accessible area, provision of special parking facilities, modifications of ventilation, heating, cooling and lighting systems, and other types of similar modifications. This agency will negotiate any changes with Space Management through Real Estate Management Division, Department of Administration to determine costs involved.

Job Restructuring:

The restructuring of any job may include modifying work hours and/or changing job duties while retaining the basic job functions. Arrangements must be considered for full-time, permanent and intermittent employment. Job sharing and flexible work hours may permit employees with disabilities to meet such needs as medical appointments and medical dietary requirements.

Support Services:

Support services such as interpreters for hearing-impaired individuals, readers for blind, special attendants, etc. must be provided when it is clearly demonstrated that these services are required for an employee's performance of the essential functions of the job. Support services may also be needed for job applicants during the interview process. This agency may directly or on a contractual basis of any agency outside the agency provide the training necessary to allow staff members to provide support services when such training and the provisions of such support services are administratively feasible.

Readers:

There are many options available to provide reading assistance to blind employees. Some agencies have found that the best way of providing reading to blind employees is to assign other employees to provide this service as needed. In most cases, this amounts to a relatively small part of an employee's workday.

Interpreters:

Although some situations will require a high level of interpreting skills, much day-to-day communication can be accomplished by employees who have learned basic sign language. In situations such as court appearances and performance evaluations, where a higher degree of interpreting skill would be necessary for effective communication, personal service contracts may also be used to obtain services from outside resources.

UNDUE HARDSHIP

In determining whether or not the making of a reasonable accommodation would impose an "undue hardship" on the operation of a recipient's program, factors to be considered must include:

- The overall size of the recipient's program (i.e., number and type of facilities, size of budget the type of the recipient's operation, including the composition and structure of the recipient's work force).
- The nature and cost of the accommodation needed.
- The reasonable ability to finance the accommodation at each site of business.
- Documented good faith efforts to explore less restrictive or less expensive alternatives, including consultation with the individual requesting accommodation or with knowledgeable persons.

FUNDING FOR REASONABLE ACCOMMODATION

Iron Range Resources will make funds available in order to provide reasonable accommodations to employees/job applicants with disabilities. (The amount will be determined by the agency head and funds will be used only when a reasonable accommodation request has been approved and signed by the agency head.)

PURCHASE AND MAINTENANCE OF ACCOMMODATION

- Iron Range Resources is free to choose the specific accommodation provided to qualified persons with disabilities. The person requesting reasonable accommodations will suggest appropriate accommodations. The agency may provide another accommodation equal or superior to the one proposed in practicality, usefulness or cost effectiveness.
- All tangible accommodations purchased by the agency will be the property of the State of Minnesota and will be used only for job related functions. The maintenance of equipment will be the responsibility of the agency and projected maintenance costs will be a factor in the initial decision to provide accommodations. Example: repair special office equipment, etc.

DENIAL OF ACCOMMODATION

All denials of requests for reasonable accommodation will be documented and kept on file by the Affirmative Action Officer. A copy of the document denying the request for reasonable accommodation will be given to the supervisor. The Affirmative Action Officer will notify the employee of the denial and inform the employee of his/her right to appeal and to file with other government agencies such as Human Rights and Equal Employment Opportunity Commission.

APPEALS

An employee who is dissatisfied with the reasonable accommodation decision can appeal directly to the agency head within ten (10) working days of the decision. The agency head will within ten (10) working days of the individual's appeal, convene a reasonable accommodation review committee which shall consist of persons previously not involved. For example, an ADA/disability coordinator, a rehabilitation engineer, or counselor may be on this committee. These persons must be knowledgeable with the ADA and reasonable accommodation. This committee will review all pertinent material and steps leading to the decision according to the following criteria:

- Job Relatedness
- Effectiveness
- Necessity
- Relationship between the accommodation and essential job function
- Other claims of undue hardship

The committee will make a recommendation to the agency within ten (10) working days from the date the committee was convened unless more time is needed to obtain more information from outside sources. The agency head will make a final determination within ten (10) working days from receiving the committee's recommendation. The Affirmative Action Officer will then convey written copies of the agency head's decision to the employee and supervisor. If the employee is still dissatisfied with the decision, she/he may file with other government agencies such as Human Rights and Equal Employment Opportunity Commission. The agency's Affirmative Action Officer will provide employees and compliance agencies with information in assistance needed in the appeals process. Information will be provided in compliance with the Minnesota Government Data Privacy Act. Compliance agencies, which are investigating complaints of a denial of accommodation, will be provided documentation relating to the denial.

REQUEST FOR REASONABLE ACCOMMODATIONS FOR JOB APPLICANTS

- Initial communication with the job applicant regarding job vacancies shall indicate the willingness of the agency to make reasonable accommodations to the known physical or mental disability and shall invite the applicant to contact the agency for the needed accommodation.
- The individual contacted with the request shall contact the Affirmative Action Officer immediately. In order to ensure that the accommodation is provided at the interview, requests shall be handled in a timely manner.
- The Affirmative Action Officer shall contact the job applicant to discuss the needed accommodation and possible alternatives.
- If the accommodation is approved, the Affirmative Action Officer will take the necessary steps to see that the accommodation is provided.

DENIAL OF ACCOMMODATION

If the requested accommodation is denied, the Affirmative Action Officer shall advise the applicant of his/her right to file a complaint with the Department of Human Rights.

EMPLOYEE REQUEST FOR REASONABLE ACCOMMODATION

Employee Name: _____

Date of Request: _____

Job Title: _____

Division: _____

This information will be used by _____ or any other person, including the agency's legal counsel, who is authorized by my employer to handle medical information or ADA/MHRA purposes and any information concerning my physical or mental condition that are necessary to determine whether I have a disability as defined by the Americans with Disabilities Act and/or the Minnesota Human Rights Act, and to determine whether any reasonable accommodations can be made. The provision of this information is voluntary, however if you refuse to provide it, your employer may refuse to provide reasonable accommodation.

1. Please describe the nature of your limitations, what life activity(s) it substantially limits and how this life activity(s) is substantially limited.

2. How does it affect your ability to perform your job?

3. Type of accommodation you are requesting:

<input type="checkbox"/> Making of facilities readily accessible	<input type="checkbox"/> Modification of equipment or devices
<input type="checkbox"/> Job restructuring	<input type="checkbox"/> Qualified reader or interpreter
<input type="checkbox"/> Part-time or modified work schedule	<input type="checkbox"/> Acquisition of equipment or devices
<input type="checkbox"/> Modification to a rule, policy or practice	<input type="checkbox"/> Other (specify)

4. Please describe in detail the accommodation you are requesting:

5. How will the requested accommodation be effective in allowing you to perform the essential functions of your job?

Additional Comments:

Signature of Employee: _____

Date: _____

REASONABLE ACCOMMODATION AGREEMENT

This form is to be completed by the agency's Affirmative Action Officer after the reasonable accommodation decision has been made. The signatures on the bottom of this form indicate an agreement between the employee and the agency to the specific accommodation.

Name of the Employee: _____

Name of Division Manager: _____

The request for reasonable accommodation to the needs of the above named disabled employee was:

Accepted Denied

Justification for the decision (indicate specific factors considered):

If reasonable accommodation was approved, was the employee's suggestion accepted?

Yes No Partially

Reason:

Describe specific accommodations to be made:

Cost Estimate:

I have read the employee request for reasonable accommodation. I understand that all tangible accommodations purchased by the agency, will become the Property of the State of Minnesota.

Signature of Employee: _____

Date: _____

Signature of Commissioner: _____

Date: _____

Signature of Affirmative Action Officer: _____

Date: _____

WEATHER EMERGENCIES

Notification of Iron Range Resources building closings due to severe weather or other emergencies are announced through the media and employees are advised to listen to the following radio stations for weather emergencies:

<p>97.9 FM – WEVE – Eveleth 93.9 FM – WTBX – Hibbing/Virginia 106.3 FM – WMFG – Hibbing 99.9 FM – USA Radio – Hibbing/Virginia/Eveleth</p>
--

To make certain that employees with hearing impairments are aware of such closings, these employees are consulted by the agency Affirmative Action Officer and, if need be, another employee, friend or family member is assigned the responsibility of personally contacting/notifying the employee with hearing impairment of such closing. A review of these responsibilities is done regularly.

BUILDING EVACUATION

Building evacuation is of particular importance to employees who have mobility or sensory impairments. Procedures need to ensure the safe and timely evacuation of these employees. Employees who may need assistance in evacuation are consulted at regular intervals by the Affirmative Action Officer to ascertain special arrangements.

Due to the length of the individual Iron Range Resources Building Evacuation Plans, they are not included as part of this Affirmative Action Plan. Building evacuation plans are posted at each respective individual building and also on file at each individual division office. All copies of such plans have been filed with the Office of Diversity and Equal Opportunity and are on file at the Iron Range Resources Human Resources office.

**Utilization Analysis Chart
2006 - 2008**

WOMEN

	A	B	C	D	E	F
EEO Job Group	Total Number in Group	Total Number of Women in Group	% Women in the Group	Availability % (from the Census Tables)	Availability Number	Number Underutilized
Officials & Administrators	7	5	71.4	37.8	3	0
Professionals	32	12	37.5	53.8	17	5
Office/Clerical	11	11	100	67.7	7	0
Skilled Craft	6	0	0	7.8	0	0
Service Maintenance	36	15	41.7	43.6	16	1

DISABLED

EEO Job Group	Total Number in Group	Total Number Disabled in Group	% Disabled in the Group	Availability % (from the Census Tables)	Availability Number	Number Underutilized
Officials & Administrators	7	0	0	11.31	1	1
Professionals	32	0	0	10.88	3	3
Office/Clerical	11	0	0	11.56	1	1
Skilled Craft	6	0	0	11.55	1	1
Service Maintenance	36	1	3	11.37	4	3

MINORITY

EEO Job Group	Total Number in Group	Total Number of Minorities in Group	% Minorities in the Group	Availability % (from the Census Tables)	Availability Number	Number Underutilized
Officials & Administrators	7	0	0	5.1	0	0
Professionals	32	0	0	8.0	3	3
Office/Clerical	11	0	0	8.2	1	1
Skilled Craft	6	0	0	7.1	0	0
Service Maintenance	36	0	0	14.3	5	5

Column Instructions for the Utilization Analysis

A = Total number of employees in the job group

B = Total number of protected group in the job group

C = The percentage that the total number of protected group is to the total number in the job group
(Column B divided by Column A)

D = Availability % (from the Census data)

E = Column A multiplied by Column D (rounded numbers)

F = Comparison of B and E. If B is larger than E, not underutilized, no disparity. If E is larger than B, underutilized, there is a disparity, and a goal would be set reflecting the difference between the number available and the actual number utilized in the job group.