

**OFFICE OF THE
ATTORNEY GENERAL**

AFFIRMATIVE ACTION PLAN

August 2016 - August 2018

*Lori Swanson
Attorney General*

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EXECUTIVE SUMMARY

Attorney General's Office
Affirmative Action Plan 2016-2018

Review revealed underutilization of the following protected group(s) in the following goal units:

EEO CATEGORIES	PROTECTED GROUPS		
	Women	Racial/Ethnic Minorities	Individuals With Disabilities
Officials/Administrators		X	
Professionals	X		
Paraprofessionals			
Office/Clerical			

Once approved, information about how to obtain or view a copy of this plan will be provided to every employee of the office. Our intention is that every employee is aware of the Attorney General's Office commitment to affirmative action and equal employment opportunity. The plan will be maintained in the Human Resources/Affirmative Action Office.

This affirmative action plan meets the requirements as set forth by Minnesota Management and Budget, and contains affirmative action goals and timetables, as well as reasonable and sufficiently assertive hiring and retention methods for achieving these goals.

Attorney General Signature: _____

HR Director/Affirmative Action Officer Signature: _____

Date: 6.08.2017

STATEMENT OF COMMITMENT

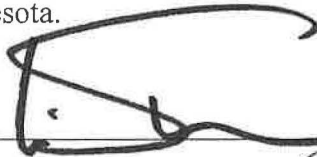
This statement reaffirms the Attorney General's Office commitment to Minnesota's statewide affirmative action efforts and providing equal employment opportunity to all employees and applicants in accordance with equal opportunity and affirmative action laws.

I affirm my personal and official support of these policies which provide that:

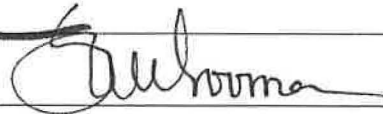
- No individual shall be discriminated against in the terms and conditions of employment, personnel practices, or access to and participation in programs, services, and activities with regard to sex, color, creed, religion, age, national origin, disability, marital status, familial status, status with regard to public assistance, sexual orientation, gender identity, gender expression, or membership or activity in a local human rights commission.
- This office is committed to the implementation of the affirmative action policies, programs, and procedures included in this plan to ensure that employment practices are free from discrimination. Employment practices include, but are not limited to, the following: hiring, promotion, demotion, transfer, recruitment or recruitment advertising, layoff, disciplinary action, termination, rates of pay or other forms of compensation. We will provide reasonable accommodation to employees with disabilities.
- This office will continue to actively promote a program of affirmative action, wherever minorities, women, and persons with disabilities are underrepresented in the workforce, and work to retain all qualified, talented employees, including protected group employees.
- This office will evaluate its efforts, including those of its deputies, managers, and supervisors, in promoting equal opportunity and achieving affirmative action objectives contained herein. In addition, this office will expect all employees to perform their job duties in a manner that promotes equal opportunity for all.

It is the office's policy to provide an employment environment free of any form of discriminatory harassment as prohibited by federal, state, and local human rights laws. I strongly encourage suggestions as to how we may improve. We strive to provide equal employment opportunities and the best possible service to the citizens of Minnesota.

Attorney General Signature: _____



HR Director/Affirmative Action Officer Signature: _____



Date: 6.08.2017

INDIVIDUALS RESPONSIBLE FOR DIRECTING/IMPLEMENTING THE AFFIRMATIVE ACTION PLAN

A. Attorney General Lori Swanson

Responsibilities:

The Attorney General is responsible for the establishment of an Affirmative Action Plan that complies with all federal and state laws and regulations.

Duties:

The duties of the Attorney General shall include, but are not limited to, the following:

- Appoint the Affirmative Action Officer or designee and include accountability for the administration of the Office's Affirmative Action Plan in his or her job duties;
- Take action, if needed, on complaints of discrimination and harassment;
- Ensure the Affirmative Action Plan is effectively communicated to all employees on an annual basis;
- Make decisions and changes in policy, procedures, or accommodations as needed to facilitate effective affirmative action and equal employment opportunity;
- Actively promote equal opportunity employment; and
- Require all office deputies, managers, and supervisors to support affirmative action, equal opportunity, diversity, and/or cultural responsiveness in their job duties and annual objectives.

B. Affirmative Action Officer or Designee

Sue Vrooman, Director of Human Resources

Responsibilities:

The Affirmative Action Officer or designee is responsible for implementation of the office's affirmative action and equal opportunity program, and oversight of the office's compliance with equal opportunity and affirmative action laws.

Duties:

The duties of the Affirmative Action Officer or designee shall include, but are not limited to, the following:

- Prepare and oversee the Affirmative Action Plan, including development and setting of office-wide goals;
- Monitor the compliance and fulfill all affirmative action reporting requirements;
- Inform the Attorney General of progress in affirmative action and equal opportunity and report potential concerns;
- Review the Affirmative Action Plan at least annually and provide updates as appropriate;
- Provide an office-wide perspective on issues relating to affirmative action and equal opportunity and assist in the identification and development of effective solutions in problem areas related to affirmative action and equal opportunity;
- Identify opportunities for infusing affirmative action and equal opportunity into the office's considerations, policies, and practices;
- Participate in and/or develop strategies to recruit individuals in protected groups for employment, promotion, and training opportunities;
- Stay current on changes to equal opportunity and affirmative action laws and interpretation of the laws;
- Provide consultation, technical guidance, and/or training to deputies, managers, supervisors, and staff regarding best practices in recruitment, selection, and retention, progress on hiring goals, reasonable accommodations, and other opportunities for improvement; and
- Serve as the office liaison with Minnesota Management and Budget's Office of Equal Opportunity and Diversity and enforcement agencies.

Accountability:

The Affirmative Action Officer is accountable directly to the Attorney General on matters pertaining to affirmative action and equal opportunity.

C. Americans with Disabilities Act Coordinator or Designee

Sue Vrooman, Director of Human Resources

Responsibilities:

The Americans with Disabilities Act Coordinator or designee is responsible for the oversight of the office's compliance with the Americans with Disabilities Act Title I – Employment, and Title II – Public Services, in accordance with the Americans with Disabilities Act – as amended, the Minnesota Human Rights Act, and Executive Order 96-09.

Duties:

The duties of the Americans with Disabilities Act Coordinator shall include, but are not limited to, the following:

- Provide guidance, coordination, and direction to office management with regard to the Americans with Disabilities Act in the development and implementation of the office's policy, procedures, practices, and programs to ensure they are accessible and nondiscriminatory;
- Provide consultation, technical guidance, and/or training to deputies, managers, supervisors, and staff regarding best practices in recruitment, selection, and retention of individuals with disabilities, provisions of reasonable accommodations for employees and applicants, and other opportunities for improvement; and
- Track and facilitate requests for reasonable accommodations for employees and applicants, as well as members of the public accessing the office's services, and reports reasonable accommodations annually to Minnesota Management and Budget.

Accountability:

The Americans with Disabilities Act Coordinator reports directly to the Attorney General.

D. Human Resources Director or Designee

Sue Vrooman, Director of Human Resources

Responsibilities:

The Human Resources Director is responsible for ensuring equitable and uniform administration of personnel policies including taking action to remove barriers to equal employment opportunity with the office.

Duties:

The duties of the Human Resources Director include, but are not limited to, the following:

- Provide leadership to human resources staff and others to ensure personnel decision-making processes adhere to equal opportunity and affirmative action principles;

- Ensure, to the extent possible, development and utilization of selection criteria that is objective, uniform, and job-related;
- Initiate and report on specific program objectives contained in the Affirmative Action Plan;
- Ensure pre-hire review process is implemented and receives support from deputies, managers, and supervisors;
- Include responsibility statements for supporting affirmative action, equal opportunity, diversity, and/or cultural responsiveness in position descriptions and annual objectives;
- Assist in recruitment and retention of individuals in protected groups, and notify deputies, managers, and supervisors of existing disparities.

Accountability:

The Human Resources Director is directly accountable to the Attorney General.

E. Deputies, Managers, and Supervisors

Responsibilities:

Deputies, Managers, and Supervisors are responsible for implementation of equal opportunity and affirmative action within their respective areas of supervision and compliance with the office's affirmative action programs and policies to ensure fair and equal treatment of all employees and applicants.

Duties:

The duties of deputies, managers, and supervisors include, but are not limited to the following:

- Assist the Affirmative Action Officer in identifying and resolving problems and eliminating barriers which inhibit equal employment opportunity;
- Communicate the office's affirmative action policy to assigned staff;
- Carry out supervisory responsibilities in accordance with the equal employment opportunity and affirmative action policies embodied in this plan;
- Maintain a consistent standard within the workplace so that employees are evaluated, recognized, developed, and rewarded on a fair and equitable basis;
- Support affirmative action, equal opportunity, diversity, and/or cultural responsiveness in staff position descriptions and annual objectives;

- To provide a positive and inclusive work environment; and
- To refer complaints of discrimination and harassment to the appropriate parties.

Accountability:

Deputies, managers, and supervisors are accountable directly to their designated supervisor and to the Attorney General.

F. All Employees

Responsibilities:

All employees are responsible for conducting themselves in accordance with the office's equal opportunity and Affirmative Action Plan and policies.

Duties:

The duties of all employees shall include, but are not limited to, the following:

- Exhibit an attitude of respect, courtesy, and cooperation towards fellow employees and the public; and
- Refrain from any actions that would adversely affect the performance of a coworkers with respect to their race, sex, color, creed, religion, age, national origin, disability, marital status, familial status, status with regard to public assistance, sexual orientation, gender identity, gender expression, or membership or activity in a local human rights commission.

Accountability:

Employees are accountable directly to their designated supervisor and to the Attorney General.

COMMUNICATION OF THE AFFIRMATIVE ACTION PLAN

The following information describes the methods that the office takes to communicate the Affirmative Action Plan to employees and the general public:

A. Internal Methods of Communication

- A memorandum detailing the location of the Affirmative Action Plan and the responsibility to read, understand, support, and implement equal opportunity and affirmative action will be sent from the Affirmative Action Officer, to all staff.
- The office's Affirmative Action Plan is available to all employees on the office's intranet website page ([Attorney General AAP](#)) or in print copy to anyone who requests it. It is also

posted on bulletin boards on each floor and/or office location. As requested, the office will make the plan available in alternative formats.

- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented and accessible to employees.

B. External Methods of Communication

- The office's Affirmative Action Plan is available in print copy to anyone who requests it. As requested, the office will make the plan available in alternative formats.
- The office's website homepage, letterhead, publications and job postings, will include the statement "an equal opportunity employer."
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented by and accessible to members of the public.

POLICY PROHIBITING DISCRIMINATION AND HARASSMENT AND COMPLAINT PROCEDURE FOR PROCESSING COMPLAINTS OF ALLEGED DISCRIMINATION/HARASSMENT

DIVERSITY POLICY

The Attorney General's Diversity Policy gives an overview of the commitment of the office to diversity and its commitment to addressing any situation which makes the workplace a difficult one for an individual to function. This section of the Plan addresses procedures for dealing with issues involving discrimination or harassment.

The Office of the Attorney General values the richness that diversity brings to the workplace and to our central mission of public service. By appreciating and encouraging the diverse talents, strengths, backgrounds and ideas of each staff member, the Attorney General's Office promotes its goal of delivering the highest quality legal service to the public and to state government.

In order to serve the people well, it is our goal to recruit, retain, support and encourage staff with diverse talents, strengths, backgrounds and ideas. To do this, the office will seek to maintain a working atmosphere in which the value of diversity is recognized, persons of all backgrounds feel welcome, and all persons are treated with dignity and respect regardless of their backgrounds, job assignments or functions.

In pursuit of these goals, the office will provide training, education, and other resources to its staff to enhance knowledge, understanding and appreciation of the diversity of our staff and of the people it serves. The office will provide fair, prompt procedures for addressing complaints of discrimination either by our staff, or by persons outside our office, including clients, attorneys, judges or other members of the public, which is directed at our staff. The office will strive to create a work environment in which concerns about discriminatory treatment can be freely raised without fear of retaliation.

POLICY AGAINST DISCRIMINATION/HARASSMENT

In support of these principles, and in accordance with all applicable federal, state and local laws, the Governor's Executive Orders, and the Rules of Professional Conduct, it is the policy of the Office of the Attorney General to prohibit harassment of its employees on the basis of sex, color, creed, religion, age, national origin, disability, marital status, familial status, status with regard to public assistance, sexual orientation, gender identity, gender expression, or membership or activity in a local human rights commission.

Such discrimination is prohibited in all aspects of employment, including, but not limited to, recruitment, hiring, training, work assignments, compensation, benefits (as determined by Minnesota Management and Budget), promotion, tenure and any other terms and conditions of employment.

To maintain a positive and productive work environment, the Affirmative Action Officer or designee and all employees are expected to report any suspected discrimination, harassment or retaliation. Any employee subjected to such harassment should file a complaint using the internal complaint procedures found in this Plan. The office shall address and take action appropriately under the facts and in accordance with this policy's enforcement mechanism, in response to all complaints of discrimination or harassment based on the above characteristics, which involve one of our staff members in the performance of his or her job duties.

Each employee is responsible for the application of this 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 or designee is responsible for notifying all employees and applicants of this policy, and informing all employees of the complaint procedure.

Definitions:

Discrimination, as it affects the terms or conditions of employment, is the failure of one employee to treat other employees equally where no reasonable distinction can be found for the difference in treatment; it is any behavior based on protected class status which is not welcome, which is personally offensive, and which therefore may affect morale and interfere with an employee's ability to perform.

Harassment is the display of behavior by one employee toward another employee which has the purpose or effect of unreasonably interfering with an individual's work environment. Under the office's Diversity Policy, no employee may be discriminated against or harassed because of the employee's sex, color, creed, religion, age, national origin, disability, marital status, familial status, status with regard to public assistance, sexual orientation, gender identity, gender expression, or membership or activity in a local human rights commission.

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

Submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of obtaining employment;

Submission to or rejection of that conduct or communication by an individual is used as a factor in decisions affecting that individual's employment; or

That conduct or communication has the purpose or effect of substantially interfering with an individual's employment or creating an intimidating, hostile or offensive employment environment.

COMPLAINT PROCEDURE FOR INTERNAL COMPLAINTS

The Attorney General's Office is committed to an Affirmative Action/Diversity Policy granting all employees, as well as applicants, a right to a workplace free of discrimination or harassment. The purpose of these procedures is to implement the office's Affirmative Action/Diversity Policy as it relates to employment matters. They are not intended to be applicable to complaints of general harassment covered by other office policies.

When an employee has a concern about alleged discriminatory or harassing conduct of the nature described in the Policy Against Discrimination in the Diversity Policy of the Office of the Attorney General from other persons within the office, the employee is encouraged to take immediate and appropriate action to address the situation, including the filing of a complaint under these procedures. Reporting discrimination or harassment can be a difficult step to take. These procedures seek to make reporting as easy as possible. Consequently, any employee who believes that he/she or another employee has been discriminated against or harassed in employment matters within the scope of the Policy, may choose to report the matter in a variety of ways. Reporting is strongly encouraged and essential in order for the office to take appropriate corrective action and to achieve the goals of the Policy. Reprisals against anyone reporting discrimination or harassment or serving as a witness, assisting, or participating in any way in an investigation, proceeding, or hearing are prohibited.

1. Reporting Discrimination or Harassment

If an employee or applicant feels he/she is being subjected to discrimination or harassment and desires to report the matter, the individual can report a complaint and discuss the matter with any of the following:

- Any manager (office manager, division manager, deputy attorney general, etc.) at the staff member's location or any other location, or
- The office's Affirmative Action Officer.

A person receiving the complaint must report the matter in writing to the Affirmative Action Officer and the section deputy of the person who is the subject of the complaint.

The employee may report a complaint orally or in writing and may use the complaint form that is attached to these procedures. If a complaint is made orally, persons receiving the complaint shall give the staff member the Tennessee Warning that is contained on the complaint form prior to making a request for information. If the person receiving the complaint is a manager and the complaint implicates the manager or presents a conflict, then that manager's supervisor shall

process the complaint consistent with the requirements of the Minnesota Rules of Professional Conduct. Persons receiving the complaint shall take any appropriate action within the scope of their authority; however, no disciplinary action shall be taken before completion of a full investigation.

- A manager or section deputy has the authority to receive and discuss the complaint and render disciplinary or remedial action after an investigation is conducted by the Affirmative Action Officer and after consultation with the Attorney General.
- The Affirmative Action Officer has the authority to receive and discuss the complaint, conduct a preliminary inquiry, and, after approval of the Attorney General, may take remedial measures including, but not limited to, an investigatory suspension or temporary reassignment pending the outcome of the preliminary inquiry or investigation.

2. Inquiry/Investigation

a. Preliminary Inquiry

The Affirmative Action Officer, in consultation with the manager of the subject of the complaint shall, if possible, initiate a preliminary inquiry within three (3) business days of receipt of the written complaint. If the preliminary inquiry establishes that a reasonable basis for the complainant's concern exists, the Affirmative Action Officer shall take appropriate intervening action to deal with the situation until such time as the complaint is investigated fully, there is a finding, and corrective action, if required, is implemented. If the Affirmative Action Officer determines that the complaint is meritless, it shall be so noted on the complaint and no further action shall be required. A complaint shall be deemed meritless either because it cannot be substantiated or it falls outside the scope of this Policy.

b. Full Investigation

If a full investigation is required, the Affirmative Action Officer shall initiate it, if possible, within ten (10) business days of receipt of the complaint. The investigation shall include an interview with the subject of the complaint. At the time of the interview, the Affirmative Action Officer shall give a summary of the complaint to the subject of the complaint. The complaint summary shall include the substance of the allegation(s) contained in the complaint. If the matter is resolved informally prior to the completion of a full investigation, the Affirmative Action Officer need not issue a written report. However, if the Affirmative Action Officer determines that the complaint is meritless, the Affirmative Action Officer shall prepare a written report indicating that the complaint is meritless.

If the subject of the complaint is a member of a bargaining unit, the Affirmative Action Officer shall notify the member's exclusive representative when a complaint has been filed and the subsequent procedure shall be open to the exclusive representative's participation if requested by the member.

Upon completion of the full investigation, the Affirmative Action Officer shall prepare a written report to the Attorney General. A copy shall be sent to the manager and section deputy of the subject of the complaint. If the investigation will take more than ten (10) days, the Affirmative Action Officer will inform the complaining employee and the subject of the complaint of when the Officer expects to complete the investigation. The report shall include recommendations for designated actions to be taken

to remedy the complaint. In making the recommendations, the Affirmative Action Officer shall consult with the manager of the subject of the complaint.

If possible, within ten (10) business days of receiving the report the Attorney General shall take final action to remedy the complaint. If disciplinary or remedial action is taken pursuant to this procedure, it may consist of, but need not be limited to, training, an oral or written reprimand, suspension, or termination. The subject of the complaint shall be provided a written summary of the report and notice of the proposed action.

The Affirmative Action Officer shall notify the complainant when final action has been taken, subject to the terms of the Data Practices Act. A final written answer will be provided within 60 days after the complaint is filed. The complainant will be notified in writing should extenuating circumstances prevent completion of the investigation within 60 days.

If at any time during the inquiry or investigation, the Affirmative Action Officer establishes that a complainant made a false report in bad faith, the office reserves the right to take employment or disciplinary action against the complainant.

3. Records Retention

The Attorney General's Office shall maintain the privacy of all records to the extent required by the Data Practices Act. All complaints (and related material) shall be retained in accordance with applicable office record retention policies and, when applicable, Minnesota Management and Budget's statewide human resource records retention schedule.

Where it has been established that a complaint is false and was made in bad faith, the office may retain documentation in the complainant's personnel record.

COMPLAINT PROCEDURE FOR COMPLAINTS BY STAFF MEMBERS AGAINST NON-STAFF MEMBERS

This procedure applies to situations in which an employee has a concern about alleged behavior by persons outside the office which, if it occurred in an employment context, would be discriminatory or harassing, as described in the Policy Against Discrimination in the Diversity Policy of the Office of the Attorney General. "Persons outside the office" include members of the public, clients, legislators, opposing counsel and judges. The employee is encouraged to take immediate and appropriate action to address the situation. However, if the employee believes that the matter requires the attention and response of the Attorney General's Office, the employee may use the following procedure.

1. An employee who has a concern about discriminatory or harassing conduct by a person outside the Office may report the concern to any manager or to a deputy.
2. The party receiving the complaint shall immediately report it to the Affirmative Action Officer. If the Affirmative Action Officer, in consultation with the employee and his/her manager, believes that the conduct merits no further action, the matter shall be dropped. However, if the matter merits further attention, the Affirmative Action Officer may within ten (10) business days, if practicable, determine the appropriate response to the concern.

If action cannot be taken within ten (10) business days, the Affirmative Action Officer shall inform the employee of the amount of time necessary to take action.

3. In all cases the Affirmative Action Officer shall inform the affected employee of the action in response to the concern.
4. If at any time during the inquiry, the Affirmative Action Officer establishes that the employee made a false report in bad faith, the office reserves the right to take appropriate employment or disciplinary action against the employee.
5. The Attorney General's Office shall maintain the privacy of all records to the extent required by the Data Practices Act. All complaints (and related material) shall be retained in accordance with applicable Office record retention policies and, when applicable, Minnesota Management and Budget's statewide human resource records retention schedule.

Where it has been established that a complaint is false and was made in bad faith, the office may retain documentation in the complainant's personnel record.

COMPLAINT PROCEDURE FOR COMPLAINTS AGAINST STAFF MEMBERS FROM NON-STAFF MEMBERS

This procedure applies to situations in which a person outside the office has a concern about alleged behavior by an employee which, if it occurred in an employment context, would be discriminatory or harassing, as described in the Policy Against Discrimination in the Diversity Policy of the Office of the Attorney General. "A person outside the office" includes members of the public (including applicants), clients, legislators, opposing counsel and judges. Complaints shall be handled as outlined in this procedure.

1. Processing the Complaint

a. Any employee who receives a complaint alleging that another employee has discriminated against or harassed a person outside the office shall refer the matter to the employee's manager and shall provide the manager with the name of the person making the complaint, that person's address and telephone number, and the identity of the employee who is the subject of the complaint. No complaint shall be processed under this procedure if the complaining party refuses to divulge his/her identity and how he/she can be contacted to verify the nature of the complaint. If the complaint implicates the manager or presents a conflict of interest, then that manager shall refer the complaint to his or her supervisor who will process the complaint pursuant to the procedures outlined in this Complaint Procedure. All complaints shall be processed in a manner consistent with the requirements of the Minnesota Rules of Professional Conduct.

b. The manager shall contact the complaining party and request that the complaining party make a written statement outlining the basis for the complaint. If the complaining party is unwilling to submit a written complaint, the manager shall make a written account of the complaint based on his/her conversation with the complainant. If the manager makes a written account of the complaint, a copy of the written account shall be sent to the complaining party with instructions that the complaining party should verify the accuracy of the account and return a signed copy of the account to the manager. Failure

of a complainant to verify the accuracy of the written complaint within a reasonable time period may be a factor considered by the manager in making a recommendation as to whether to proceed with the complaint pursuant to paragraph 1.d of these procedures.

c. The manager shall advise the employee against whom the complaint was made of the substance of the allegations contained in the complaint and shall discuss the complaint with the employee. The manager may also have further discussions with the complaining party regarding the complaint. The employee shall be given an opportunity to respond to the complaint.

If the employee who is the subject of the complaint is a member of a bargaining unit, the Affirmative Action Officer or manager shall notify the employee's exclusive representative that a complaint has been filed and the subsequent procedure shall be open to the exclusive representative's participation if requested by the employee.

d. After meeting or conferring with the complaining party and the employee about whom the complaint was made, the manager shall make a written report within fifteen (15) business days after receiving the complaint. This report shall include the identity of the employee against whom the complaint has been made, the identity of the party bringing the complaint, the nature of the complaint, and the manager's recommendation as to how the complaint should be handled. A manager shall recommend either that no further action be taken or recommend that the matter be subject to a preliminary inquiry. If the manager has consulted with the Affirmative Action Officer, a full investigation may be recommended rather than a preliminary inquiry. However, a manager shall not recommend that the matter shall be subject to further investigation until he/she has discussed the complaint with the individual employee. The manager's recommendation shall contain the employee's response to the complaint. A copy of the report shall be provided to the individual employee, the Affirmative Action Officer and the employee's section deputy.

The employee shall have ten (10) business days after receipt of the report in which to provide a written response to the report before any investigation commences.

2. Inquiry/Investigation

a. Preliminary Inquiry

The Affirmative Action Officer, in consultation with the manager of the subject of the complaint, shall conduct a preliminary inquiry within twelve (12) business days of receipt of the written response. If this preliminary inquiry establishes that a reasonable basis for the complaint exists, a full investigation will be conducted. If the Affirmative Action Officer determines that the complaint is meritless, it shall be so noted on the complaint and the report. A complaint shall be deemed meritless either because it cannot be substantiated or it falls outside the scope of this policy.

b. Full Investigation

If possible, within ten (10) business days after a determination to conduct a full investigation the Affirmative Action Officer shall conduct a full investigation that shall include an interview with the subject of the complaint. If the investigation will take more than ten (10) business days, the Affirmative Action Officer will inform the subject of the complaint when the Officer expects to

complete the investigation. Upon completion of the full investigation the Affirmative Action Officer shall prepare and submit a report to the Attorney General together with any other related materials. A copy shall be sent to the employee's manager and section deputy. The report shall include recommendations for designated actions to be taken to remedy the complaint. In making the recommendations, the Affirmative Action Officer shall consult with the appropriate manager.

If possible, within ten (10) business days of receiving the report the Attorney General shall take final action to remedy the complaint. If disciplinary or remedial action is warranted, it may consist of, but need not be limited to, training, an oral or written reprimand, suspension, or termination. The subject of the complaint shall be provided a written summary of the report and notice of the proposed action.

The Affirmative Action Officer shall notify the complainant when final action has been taken, subject to the terms of the Data Practices Act.

3. Records Retention

The Attorney General's Office shall maintain the privacy of all records to the extent required by the Data Practices Act. All complaints (and related material) shall be retained in accordance with applicable Office record retention policies and, when applicable, Minnesota Management and Budget's statewide human resource records retention schedule.

REASONABLE ACCOMMODATION POLICY

A. Policy

The Office of the Minnesota Attorney General is committed to the fair and equal employment of people with disabilities. Reasonable accommodation is the key to this non-discrimination policy. While many individuals with disabilities can work without accommodation, other qualified applicants and employees face barriers to employment without the accommodation process. It is the policy of the Office of the Minnesota Attorney General to reasonably accommodate qualified individuals with disabilities unless the accommodation would impose an undue hardship or pose a direct threat. In accordance with the Minnesota Human Rights Act and the Americans with Disabilities Act, accommodations will be provided to qualified individuals with disabilities when such accommodations are directly related to performing the essential functions of a job, competing for a job, or to enjoy equal benefits and privileges of employment. This policy applies to all applicants, employees, and employees seeking promotional opportunities.

The Attorney General's Office must comply with all state and federal laws that prohibit discrimination against qualified individuals with disabilities in all employment practices. The office must provide reasonable accommodations to qualified applicants and employees with disabilities unless to do so would cause an undue hardship or pose a direct threat. Reasonable accommodation must be provided when:

- A qualified applicant with a disability needs an accommodation to have an equal opportunity to compete for a job;
- A qualified employee with a disability needs an accommodation to perform the essential functions of the employee's job; and
- A qualified employee with a disability needs an accommodation to enjoy equal access to benefits and privileges of employment (e.g., trainings, office sponsored events).

Definitions:

Applicant

A person who expresses interest in employment and satisfies the minimum requirements for application established by the job posting and job description.

Americans with Disabilities Act (ADA) Coordinator

The office is required to appoint an ADA Coordinator or designee, to direct and coordinate compliance with Title I of the ADA.

Direct Threat

A significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by reasonable accommodation.

The determination that an individual poses a direct threat shall be based on an individualized assessment of the individual's present ability to safely perform the essential functions of the job.

Essential Functions

Duties so fundamental that the individual cannot do the job without being able to perform them. A function can be essential if:

- The job exists specifically to perform the function(s); or
- There are a limited number of other employees who could perform the function(s); or
- The function(s) is/are specialized and the individual is hired based on the employee's expertise.

Interactive Process

A discussion between the employer and the individual with a disability to determine an effective reasonable accommodation for the individual with a disability. To be interactive, both sides must communicate and exchange information.

Individual with a Disability

An individual who:

- Has a physical, sensory, or mental impairment that substantially limits one or more major life activities; or
- Has a record or history of such impairment; or
- Is regarded as having such impairment.

Qualified Individual with a Disability

An individual who:

- Satisfies the requisite skill, experience, education, and other job-related requirements of the job that the individual holds or desires; and
- Can perform the essential functions of the position with or without reasonable accommodation.

Major Life Activities

May include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

Major life activities also include the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

Medical Documentation

Information from the requestor's treating provider which is sufficient to enable the employer to determine whether an individual has a disability and whether and what type of reasonable accommodation is needed when the disability or the need for accommodation is not obvious. Medical documentation can be requested using the standardized *Letter Requesting Documentation for Determining ADA Eligibility from a Medical Provider*.

Reasonable Accommodation

An adjustment or alteration that enables a qualified individual with a disability to apply for a job, perform job duties, or enjoy the benefits and privileges of employment. Reasonable accommodations may include:

- Modifications or adjustments to a job application process to permit a qualified individual with a disability to be considered for a job; or
- Modifications or adjustments to enable a qualified individual with a disability to perform the essential functions of the job; or
- Modifications or adjustments that enable qualified employees with disabilities to enjoy equal benefits and privileges of employment.

Examples of accommodations may include acquiring or modifying equipment or devices, modifying training materials, making facilities readily accessible, modifying work schedules, and reassignment to a vacant position.

Reassignment

Reassignment to a vacant position for which an employee is qualified is a "last resort" form of a reasonable accommodation. This type of accommodation must be provided to an employee who, because of a disability, can no longer perform the essential functions of the position, with or without reasonable accommodation, unless the employer can show that it will be an undue hardship.

Support Person

Any person an individual with a disability identifies to help during the reasonable accommodation process in terms of filling out paperwork, attending meetings during the interactive process to take notes or ask clarifying questions, or to provide emotional support.

Undue Hardship

A specific reasonable accommodation would require significant difficulty or expense. Undue hardship is always determined on a case-by-case basis considering factors that include the nature and cost of the accommodation requested and the impact of the accommodation on the operations of the office. The office is not required to provide accommodations that would impose an undue hardship on the operation of the office.

GENERAL STANDARDS AND EXPECTATIONS

Individuals Who May Request a Reasonable Accommodation Include:

- Any qualified applicant with a disability who needs assistance with the job application procedure or the interview or selection process; or
- Any qualified employee with a disability who needs a reasonable accommodation to perform the essential functions of the position; or
- A third party, such as a family member, friend, health professional or other representative, on behalf of a qualified applicant or employee with a disability, when the applicant or employee is unable to make the request for reasonable accommodation. When possible, the office will contact the applicant or employee to confirm that the accommodation is wanted. The applicant or employee has the discretion to accept or reject the proposed accommodation.

The office must abide by the Minnesota Government Data Practices Act, Chapter 13, in obtaining or sharing information related to accommodation requests.

How to Request a Reasonable Accommodation

An office applicant or employee may make a reasonable accommodation request to any or all of the following:

- Immediate supervisor or manager;
- Affirmative Action Officer/Designee;
- ADA Coordinator;
- Human Resources Office;
- Any manager or employee with whom the applicant has contact during the application, interview and/or selection process.

Timing of the Request

An applicant or employee may request a reasonable accommodation at any time, even if the individual has not previously disclosed the existence of a disability or the need for an accommodation. A request is any communication in which an individual asks or states that he or she needs the office to provide or change something because of a medical condition.

The reasonable accommodation process begins as soon as possible after the request for accommodation is made.

Form of the Request

The applicant or employee is responsible for requesting a reasonable accommodation or providing sufficient notice to the office that an accommodation is needed.

An initial request for accommodation may be made in any manner (e.g., writing, electronically, in person or orally).

The individual requesting an accommodation does not have to use any special words and does not have to mention the ADA or use the phrase "reasonable accommodation" or "disability."

Oral requests must be documented in writing to ensure efficient processing of requests.

Accommodation request forms can be obtained from the Human Resources Director.

When a supervisor or manager observes or receives information indicating that an employee is experiencing difficulty performing the job due to a medical condition or disability, further inquiry may be required. Supervisors or managers should consult with the ADA Coordinator for advice on how to proceed.

When an employee needs the same reasonable accommodation on a repeated basis (e.g., the assistance of a sign language interpreter), a written request for accommodation is required the first time only. However, the employee requesting an accommodation must give appropriate advance notice each subsequent time the accommodation is needed. If the accommodation is needed on a regular basis (e.g., a weekly staff meeting), the office must make appropriate arrangements without requiring a request in advance of each occasion.

The Interactive Process

Communication is a priority and encouraged throughout the reasonable accommodation process. The interactive process is a collaborative process between the employee and/or applicant and the ADA Coordinator to explore and identify specific reasonable accommodation(s).

The interactive process should begin as soon as possible after a request for reasonable accommodation is made or the need for accommodation becomes known.

The process should ensure a full exchange of relevant information and communication between the individual and the office. An individual may request that a union representative or support person be present.

Responsibility for Processing the Request

As the first step in processing a request for reasonable accommodation, the person who receives the request must promptly forward the request to the appropriate decision maker. At the same time, the recipient will notify the requestor who the decision maker is.

Attorney General

The Attorney General has the ultimate responsibility to ensure compliance with the ADA and this policy and appoint an ADA Coordinator.

ADA Coordinator

The ADA Coordinator is the decision maker for reasonable accommodation requests for all types of requests outside of the supervisors' and managers' authority. The ADA Coordinator will work with the supervisor and manager to implement the approved reasonable accommodation.

Analysis for Processing Requests

Before approving or denying a request for accommodation, the ADA Coordinator will:

1. Determine if the requestor is a qualified individual with a disability;
2. Determine if the accommodation is needed to:
 - Enable a qualified applicant with a disability to be considered for the position the individual desires;
 - Enable a qualified employee with a disability to perform the essential functions of the position; or
 - Enable a qualified employee with a disability to enjoy equal benefits or privileges of employment as similarly situated employees without disabilities;
3. Determine whether the requested accommodation is reasonable;
4. Determine whether there is a reasonable accommodation that will be effective for the requestor and the office; and
5. Determine whether the reasonable accommodation will impose an undue hardship on the office's operations.

An employee's accommodation preference is always seriously considered, but the office is not obligated to provide the requestor's accommodation of choice, so long as it offers an effective accommodation, or determines that accommodation would cause an undue hardship.

Obtaining Medical Documentation in Connection with a Request for Reasonable Accommodation

In some cases, the disability and need for accommodation will be reasonably evident or already known, for example, where an employee is blind. In these cases, the office will not seek further medical documentation. If a requestor's disability and/or need for reasonable accommodation are not obvious or already known, the ADA Coordinator may require medical information showing that the requestor has a covered disability that requires accommodation. The ADA Coordinator may request medical information in certain other circumstances. For example, when:

- The information submitted by the requestor is insufficient to document the disability or the need for the accommodation;
- A question exists as to whether an individual is able to perform the essential functions of the position, with or without reasonable accommodation; or
- A question exists as to whether the employee will pose a direct threat to himself/herself or others.

Where medical documentation is necessary, the ADA Coordinator must make the request and use the Letter Requesting Documentation for Determining ADA Eligibility from a Medical Provider. The ADA Coordinator must also obtain the requestor's completed and signed Authorization for Release of Medical Information.

Only medical documentation specifically related to the employee's request for accommodation and ability to perform the essential functions of the position will be requested. When medical documentation or information is appropriately requested, an employee must provide it in a timely manner, or the Office may deny the reasonable accommodation request. The ADA Coordinator must not request medical records; medical records are not appropriate documentation and cannot be accepted. **Supervisors and managers must not request medical information or documentation from an applicant or employee seeking an accommodation.** Such a request will be made by the ADA Coordinator, if appropriate.

Confidentiality Requirements

Medical Information

Medical information obtained in connection with the reasonable accommodation process must be kept confidential. All medical information obtained in connection with such requests must be collected and maintained on separate forms and in separate physical or electronic files from non-medical personnel files and records. Electronic copies of medical information obtained in connection with the reasonable accommodation process must be stored so that access is limited to only the ADA Coordinator. Physical copies of such medical information must be stored in a locked cabinet or office when not in use or unattended. Generally, medical documentation obtained in connection with the reasonable accommodation process should only be reviewed by the ADA Coordinator.

The ADA Coordinator may disclose medical information obtained in connection with the reasonable accommodation process to the following:

- Supervisors, managers or HR staff who have a need to know may be told about the necessary work restrictions and about the accommodations necessary to perform the employee's duties.

However, information about the employee's medical condition should only be disclosed if strictly necessary, such as for safety reasons;

- First aid and safety personnel may be informed, when appropriate, if the employee may require emergency treatment or assistance in an emergency evacuation;
- To consult with the State ADA Coordinator or Employment Law Counsel at MMB, or the Attorney General's Office about accommodation requests, denial of accommodation requests or purchasing of specific assistive technology or other resources; or
- Government officials assigned to investigate compliance with the ADA.

Whenever medical information is appropriately disclosed as described above, the recipients of the information must comply with all confidentiality requirements.

Accommodation Information

The fact that an individual is receiving an accommodation because of a disability is confidential and may only be shared with those individuals who have a need to know for purposes of implementing the accommodation, such as the requestor's supervisor and the ADA Coordinator.

General Information

General summary information regarding an employee's or applicant's status as an individual with a disability may be collected by equal opportunity officials to maintain records and evaluate and report on the office's performance in hiring, retention, and processing reasonable accommodation requests.

Approval of Requests for Reasonable Accommodation

As soon as the ADA Coordinator determines that a reasonable accommodation will be provided, the Coordinator will process the request and provide the reasonable accommodation in as short of a timeframe as possible. The time necessary to process a request will depend on the nature of the accommodation requested and whether it is necessary to obtain supporting information. If an approved accommodation cannot be provided within a reasonable time, the decision maker will inform the requestor of the status of the request before the end of 30 days. Where feasible, if there is a delay in providing the request, temporary measures will be taken to provide assistance.

Once approved, the reasonable accommodation should be documented for record keeping purposes and the records maintained by the ADA Coordinator.

Funding for Reasonable Accommodations

Funding must be approved for accommodations that do not cause an undue hardship.

Procedures for Reassignment as a Reasonable Accommodation

Reassignment to a vacant position is an accommodation that must be considered if there are no effective reasonable accommodations that would enable the employee to perform the essential functions of his/her current job, or if all other reasonable accommodations would impose an undue hardship.

The ADA Coordinator will work with appropriate staff and the requestor to identify appropriate vacant positions within the office for which the employee may be qualified and can perform the essential functions of the vacant position, with or without reasonable accommodation. Vacant positions which are equivalent to the employee's current job in terms of pay, status, and other relevant factors will be considered first. If there are none, the office will consider vacant lower level positions for which the individual is qualified. The EEOC recommends the consideration of positions that are currently vacant or will be coming open within at least the next 60 days.

Denial of Requests for Reasonable Accommodation

The ADA Coordinator must be contacted for assistance and guidance prior to denying any request for reasonable accommodation. The office may deny a request for reasonable accommodation where:

- The individual is not a qualified individual with a disability;
- The reasonable accommodation results in undue hardship or the individual poses a direct threat to the individual or others. Undue hardship and direct threat are determined on a case-by-case basis with guidance from the ADA Coordinator; or
- Where no reasonable accommodation, including reassignment to a vacant position, will enable the employee to perform all the essential functions of the job.

The explanation for denial must be provided to the requestor in writing. The explanation should be written in plain language and clearly state the specific reasons for denial. Where the decision maker has denied a specific requested accommodation, but has offered a different accommodation in its place, the decision letter should explain both the reasons for denying the accommodation requested and the reasons that the accommodation being offered will be effective.

Consideration of Undue Hardship

Determination of undue hardship is made on a case-by-case basis and only after consultation with the ADA Coordinator. In determining whether granting a reasonable accommodation will cause an undue hardship, the office considers factors such as the nature and cost of the accommodation in relationship to the size and resources of the office and the impact the accommodation will have on the operations of the office.

Determining Direct Threat

The determination that an individual poses a "direct threat," (i.e., a significant risk of substantial harm to the health or safety of the individual or others) which cannot be eliminated or reduced by a reasonable accommodation, must be based on an individualized assessment of the individual's present ability to safely perform the essential functions of the job with or without reasonable accommodation. A

determination that an individual poses a direct threat cannot be based on fears, misconceptions, or stereotypes about the individual's disability. Instead, the office will make a reasonable medical judgment, relying on the most current medical knowledge and the best available objective evidence.

In determining whether an individual poses a direct threat, the factors to be considered include:

- Duration of the risk;
- Nature and severity of the potential harm;
- Likelihood that the potential harm will occur; and
- Imminence of the potential harm.

Appeals Process in the Event of Denial

An applicant or employee may choose to appeal the denial of a reasonable accommodation request. This process:

- Must include review by a Deputy Attorney General;
- May include review by the State ADA Coordinator; and/or
- Must inform the requestor of the statutory right to file a charge with the Equal Employment Opportunity Commission or the Minnesota Department of Human Rights.

Information Tracking and Records Retention

The office will track reasonable accommodations requested and report once a year by September 1st to MMB the number and types of accommodations requested, approved, denied and other relevant information.

The office will retain reasonable accommodation documentation according to the records retention schedule, but in all cases for at least one year from the date the record is made or the personnel action involved is taken, whichever occurs later. 29 C.F.R. § 1602.14.

EVACUATION PROCEDURES FOR INDIVIDUALS WITH DISABILITIES

A copy of the office's weather and emergency evacuation plan can be found on its intranet website. It is also prominently displayed at each office location on bulletin boards and in each conference room. All staff have received copies of these plans, new employees receive a copy upon hire, and staff are reminded periodically to review them. Updates are issued as needed. All office locations work closely with the management companies of those buildings so that all staff are aware of and follow building evacuation procedures.

The plans provide for aiding staff who require assistance during an evacuation of the premises. Physical assistance monitors have been assigned at each location and on each floor, if applicable, to assist individuals with disabilities during a weather emergency or evacuation. These monitors are listed, and are routinely updated as needed, in the weather and emergency evacuation plan. All receptionists have been notified of the need to be aware of visitors who might require assistance during an evacuation and staff have been advised of the possibility of this need in the location evacuation plans.

Everyone has a responsibility to develop their own personal emergency evacuation plan, including individuals with disabilities or individuals who will need assistance during evacuation. To request assistance in setting up a personal evacuation plan, staff should contact:

- Sue Vrooman, HR Director (651) 757-1057, sue.vrooman@ag.state.mn.us; or
- Donna Paulson, Personnel Assistant, (651) 757-1262, donna.paulson@ag.state.mn.us.

Evacuation Options:

Individuals with disabilities have the following evacuation options:

- Horizontal evacuation: Using building exits to the outside ground level or going into unaffected wings of multi-building complexes;
- Stairway evacuation: Using steps to reach ground level exits from building;
- Shelter in place: Unless danger is imminent, remain in a room with an exterior window, a telephone, and a solid or fire resistant door. If the individual requiring special evacuation assistance remains in place, they should dial 911 immediately and report their location to emergency services, who will in turn relay that information to on-site responders. The shelter in place approach may be more appropriate for sprinkler protected buildings where an area of refuge is not nearby or available. It may be more appropriate for an individual who is alone when the alarm sounds;
- Area of rescue assistance: Identified areas that can be used as a means of egress for individuals with disabilities. These areas, located on floors above or below the building's exits, can be used by individuals with disabilities until rescue can be facilitated by emergency responders.

Evacuation Procedures for Individuals with Mobility, Hearing or Visual Disabilities:

Individuals with disabilities should follow the following procedure:

- **Mobility disabilities (individuals who use wheelchairs or other personal mobility devices):** Individuals using wheelchairs should be accompanied to an area of rescue assistance by a designated physical assistance monitor, or shelter in place when the alarm sounds. Physical assistance monitors will inform building security staff of individuals awaiting rescue in the designated rescue area. Security staff will respond to each of the areas of rescue assistance when a building evacuation is initiated to identify the individuals in these areas and notify emergency responders as to how many individuals need assistance to safely evacuate.
- **Mobility disabilities (individuals who do not use wheelchairs or other personal mobility devices):** Individuals with mobility disabilities who are able to walk independently, may be able to negotiate stairs in an emergency with minor assistance. If danger is imminent, the individual should wait until the heavy traffic has cleared before attempting the stairs. If there is no immediate danger (detectable smoke, fire, or unusual odor), the individual with a disability may choose to wait at the area of rescue assistance until emergency responders arrive to assist them. The physical assistance monitor should offer assistance and, if accepted, accompany the individual with the disability through the evacuation route.
- **Hearing disabilities:** The buildings are equipped with fire alarm horns/strobes that sound an alarm and flash strobe lights. The strobe lights are intended for individuals who are deaf and/or hard of hearing. Individuals with hearing disabilities may not notice or hear emergency alarms and will need to be alerted of emergency situations. The physical assistance monitor should offer assistance and, if accepted, accompany the individual with the hearing disability through the evacuation route.
- **Visual disabilities:** The buildings are equipped with fire alarm horn/strobes that sound the alarm and flash strobe lights. The horn will alert individuals who are blind or have visual disabilities of the need to evacuate. Most individuals with visual disabilities will be familiar with their immediate surroundings and frequently traveled routes. Since the emergency evacuation route is likely different from the common traveled route, individuals with visual disabilities may need assistance in evacuating. The physical assistance monitor should offer assistance and, if accepted, guide the individual with a visual disability through the evacuation route.

Severe Weather Evacuation Options:

Individuals with disabilities or who are in need of assistance during an evacuation have these options based on their location in their building:

- **Horizontal evacuation:** If located on the ground or basement floor, severe weather shelter areas are located throughout each floor;
- If there are no safe areas above the ground floor, the elevator may be used to evacuate to the ground or basement levels; and/or

- Shelter in Place: Seek shelter in a designated severe weather shelter area as designated by the office's weather and emergency evacuation plan, and remain there until the all clear is issued.

GOALS AND TIMETABLES

PURPOSE

State law requires that numerical goals be established for each occupational category where one or more protected groups are under-represented. The law also requires that reasonable timetables be established for achievement of these goals. This section establishes reasonable and attainable numerical standards. They are an essential frame of reference for evaluating progress.

DEVELOPMENT OF GOALS

The following criteria are used in developing goals: Percentage of members of each protected class in the recruiting area population who have the necessary skills and availability of protected class members in the recruiting area population.

The Attorney General's Office is composed of four principal occupational groups. These are Officials/Administrators, Professionals, Paraprofessionals and Office/Clerical (support staff).

Through the utilization analysis, the office has determined which job categories are underutilized for women, minorities, and individuals with disabilities within the office and has set forth the following hiring goals for the next two years:

GOALS AND TIMETABLES CHART									
	Women			Minorities			People with a Disability		
EEO Job Group	Number Under-utilized	Goal	Timetable	Number Under-utilized	Goal	Timetable	Number Under-utilized	Goal	Timetable
Officials and Administrators				1	1	2016-2018			
Professionals	7	7	2016-2018						
Paraprofessionals									
Office/Clerical									

Availability:

The method of establishing goals for the 2016-2018 plan included use of Job Classifications by EEO-4 Categories, and a two-factor analysis of internal and external availability. The two-factor analysis consisted of EEO job group availability for women, minorities and people with disabilities from

Minnesota Management and Budget's 2010 Labor Force Availability and appointment summary data. Because our recruitment efforts generally focus on the statewide area, we determined the recruitment area to be statewide availability.

Underutilization Analysis worksheets are attached in the appendix. Numbers less than 10 are indicated with "<10" in accordance with Minnesota Management and Budget's guidance on data privacy.

Women:

The population of women in the Attorney General's Office has improved in all categories. We have set a goal of hiring seven women in this category.

Minorities:

The population of minorities in the Attorney General's Office has improved in all but one category, Officials/Administrators. One employee in this category retired, which led to the underutilization. There are only 29 employees in this job group and it is difficult to say whether we will have any vacancies in this category during the 2016-2018 reporting period.

Individuals with Disabilities:

The population of individuals with disabilities has improved in all job categories. We will continue to actively recruit individuals with disabilities.

AFFIRMATIVE ACTION PROGRAM OBJECTIVES

In pursuing the office's commitment to affirmative action, the office will take the following actions in 2016-2018:

Objective #1: The Attorney General's Office will keep employees informed, updated and aware of the Office's Affirmative Action Plan, Sexual Harassment Policy, Diversity Policy and complaint procedures, and ADA Policy and Procedures.

Action Steps:

- Post Affirmative Action Plan in visible locations throughout the office and on the intranet;
- Provide policies and objectives at new employee orientation;
- Provide relevant updates and training opportunities for all staff.

Evaluation: This is an ongoing objective from the 2014-2016 Plan. During new employee orientation employees are provided with information on where to find the Affirmative Action Plan, and are given copies of the office's Diversity Policy, ADA Policy and Procedures and Sexual Harassment Policy. All new staff are required to confirm that they have read the Sexual Harassment Policy within three months of hire and this was achieved. Our intranet web page is updated frequently with continuing legal education

opportunities and other available seminars and conferences. We will continue to be proactive in this regard.

Objective #2: Regularly audit, analyze and evaluate progress to address underutilization areas.

Action Steps:

- Collect underutilization data quarterly to observe and evaluate overall workforce makeup and evaluate retention trends in all occupational categories;
- Conduct exit interviews, review exit surveys, and prepare and analyze annual statistical retention report.

Evaluation: This is an ongoing objective from the previous Plan; however, our underutilization evaluation will occur quarterly rather than annually in order to more consistently measure our progress in achieving our goals. Exit interview and survey data was reviewed immediately, statistics were compiled on an ongoing basis, and information was reviewed for patterns and trends.

Objective #3: Analyze promotion patterns to identify disparities between protected group members and non-protected group members to ensure that all employees have an equal opportunity to fill promotional vacancies.

Action Steps:

- Review criteria for promotion; clarify and eliminate barriers; identify changes that may be needed in the decision making process;
- Identify development needs for individual staff, and provide appropriate training which would lead to promotional opportunities.

Evaluation: This is an ongoing Plan objective. We successfully promoted minorities and an individual with a disability in two job categories. We have successfully increased the number of promotional opportunities available internally and will continue to closely review these job opportunities to ensure that they are inclusive of all employees.

METHODS OF AUDITING, EVALUATING, AND REPORTING PROGRAM SUCCESS

A. Pre-Employment Review Procedure/Monitoring the Hiring Process

The office will evaluate its selection process to determine if its requirements unnecessarily screen out a disproportionate number of women, minorities, individuals with disabilities, or veterans. The office will use the Monitoring the Hiring Process form for every classified hire to track the number of women, minorities, individuals with disabilities, and veterans in each stage of the selection process. Deputies, managers, and supervisors will work closely with the Affirmative Action Officer in reviewing the requirements for positions, and interviewing and selection to ensure that equal opportunity and affirmative action is carried out.

The office will continue to report the number of affirmative and non-affirmative classified hires as well as missed opportunities to Minnesota Management and Budget on a quarterly basis.

When candidates are offered interviews, employees scheduling interviews will describe the interview format to the candidate and provide an invitation to request a reasonable accommodation for individuals with disabilities to allow the candidate equal opportunity to participate in the interview process. For example, describe if interview questions are offered ahead of time or what technology may be used during the interview process. This allows for an individual with a disability to determine if they may need a reasonable accommodation in advance of the interview.

All personnel involved in the selection process will be trained and accountable for the office's commitment to equal opportunity and the affirmative action program and its implementation.

B. Pre-Review Procedure for Layoff Decisions

The Affirmative Action Officer, in conjunction with managers, shall be responsible for reviewing all pending layoffs to determine their effect on the office's affirmative action goals and timetables.

If it is determined that there is an adverse impact on protected groups, the office will document the reasons why the layoff is occurring, such as positions targeted for layoff, applicable personnel policies or collective bargaining agreement provisions, or other relevant reasons. The office will determine if other alternatives are available to minimize the impact on protected groups.

C. Other Methods of Program Evaluation

The office submits the following compliance reports to Minnesota Management and Budget as part of the efforts to evaluate its affirmative action program:

- Quarterly Monitoring the Hiring Process Reports;
- Biennial Affirmative Action Plan;

- Annual Americans with Disabilities Act Report;
- Annual Internal Complaint Report; and
- Disposition of Internal Complaint (within 30 days of final disposition).

The office also evaluates the Affirmative Action Plan in the following ways:

- Monitors progress toward stated goals by job category;
- Analyzes employment activity (hires, promotions, and terminations) by job category to determine if there is an adverse impact;
- Analyzes compensation program to determine if there are patterns of discrimination;
- Reviews the accessibility of online systems and websites, and ensures that reasonable accommodations can be easily requested; and
- Discusses progress with leadership on a periodic basis and makes recommendations for improvement.

RECRUITMENT PLAN

The objective of this recruitment plan is to ensure the office's recruitment programs are publicly marketed, and that they attract and obtain qualified applicants, enhance the image of state employment, and assist in meeting the affirmative action goals to achieve a diverse workforce.

Below are the various recruitment methods or strategies utilized by the office during the past year and plans for the upcoming plan years 2016-2018.

ATTORNEY AND OTHER PROFESSIONAL RECRUITMENT

Hiring criteria include a broad range of factors. The Attorney Recruitment Guide states:

In evaluating applicants, we seek to identify the unique strengths of each candidate and to achieve diversity in our hiring decisions. Numerous factors are considered including the individual's particular interest in our Office and a demonstrated interest in public service generally; academic achievement; participation in law review, moot court competitions or other law-related activities; written, oral and analytical skills; other life or work experiences; and the personal qualities demonstrated by the applicant.

The Attorney General's Office recruits attorneys from all local law schools, as well as outstate law schools. We actively recruit for attorney positions through Minnesota Bench & Bar, Minnesota Lawyer, the American, Hennepin County, and Ramsey County Bar Associations, the Federal Bar Association, the Minnesota Asian Pacific American Bar Association, the Minnesota Association of Black Lawyers, the

Minnesota Hispanic Bar Association, and other legal professional associations. In addition, we advertise on numerous online websites and newspapers.

The Attorney General's Office advertises at over 75 colleges, universities, community and technical colleges, to recruit individuals for professional positions which are not attorney positions.

We have recruited on-site on college campuses during this reporting period including at Minnesota State University Mankato, St. Cloud State University, Minnesota State University Moorhead, University of Minnesota Twin Cities and Duluth campuses, College of St. Benedict, St. John University, St. Olaf College, and Gustavus Adolphus College.

We are frequently in direct contact with professors, career services' staff, and offices of equity and diversity at many colleges in order to attract qualified candidates and meet our goal of achieving a diverse workforce. We also network with numerous student associations and organizations at colleges in Minnesota and in the region to encourage protected group candidates and individuals with disabilities to consider the Office for employment. A few examples are:

- University of Minnesota – Black Graduate and Professional Students Association
- University of Minnesota Office of Equity and Diversity
- St. Thomas Native American Law Student Association
- Mitchell Hamline Asian Pacific American Law Student Association
- University of North Dakota Multicultural Law Student Association
- Bemidji State Council of Indian Students
- Metro State University Hmong Student Organization
- Minnesota State University at Mankato Somali Student Association
- St. Cloud State University Council of African American Students
- Winona State University Latino-American Student Organization
- University of Wisconsin Madison Chinese Students and Scholars Association

The office has also recruited attorneys and other professionals by proactively speaking at meetings and attending conferences of the following organizations, and will continue to do so in the upcoming plan years:

- Government and Nonprofit Career Fair
- Diversity Networking and Job Fair
- Twin Cities Diversity in Practice (Minnesota Minority Recruitment Conference)
- Minnesota Association of Black Lawyers (MABL)
- University of Minnesota Law School Recruiting Event – Black Law Students Association
- St. Thomas Law – Multicultural Reception

OFFICE SUPPORT STAFF RECRUITMENT

On average we fill approximately 15-20 classified positions per year. We obtain lists of candidates for each classified position via Recruiting Solutions, following the guidelines established in the Multi-Source Recruitment and Selection Guidebook, and MMB personnel policies and rules. Searches for disparate applicants are performed and preference is given to those applicants that meet the minimum qualifications

of a position. The office has also worked with DEED's Division of Vocational Rehabilitation to find qualified candidates, and will continue to do so.

COMMUNITY-BASED NOTIFICATION

The office provides notices of employment opportunities to local law schools: the University of Minnesota, Mitchell Hamline Law School, and the University of St. Thomas.

PERSONS RESPONSIBLE FOR RECRUITMENT PLANS

Under the general direction of the Attorney General and the Affirmative Action Officer, the following staff have responsibility for specific job groups.

Managers Recruitment responsibilities are assigned to staff identified by the Attorney General.

Legal Assistants Recruitment responsibilities are assigned to staff identified by the Attorney General.

Support Staff Recruitment responsibilities are assigned to the Director of Human Resources.

All of the above persons are aware of the office's commitment to hire affirmatively and are required to adopt proactive methods to identify and recruit diverse candidates.

RECRUITMENT FOR PERSONS WITH DISABILITIES

1. Review of job postings for physical and sensory requirements and ensure that qualifications in job postings are inclusive and do not pose any unnecessary barriers.
 - a. Our office will review all job postings for physical and sensory requirements and determine if the qualifications for the position are job-related and consistent with business necessity.
2. Self-Identification
 - a. At the time of application and once a year, our office will communicate to our employees that we collect summary data related to the number of individuals who have applied for classified positions and who are in our workforce. We will inform employees that we collect this summary data to make determinations about where we need to improve in terms of recruitment, selection, or retention of individuals with disabilities.
3. Supported Employment (Minn. Stat. § 43A.191, subd. 2(d))
 - a. The office supports the employment of individuals with disabilities and will review vacant positions to determine if job tasks can be performed by a supported employment worker. We will work with community organizations that provide services to individuals with disabilities to recruit for these positions when they become available.
4. Accessibility Matters Campaign
 - a. The office will distribute marketing material and resources to our staff to remind them to create accessible electronic documents and systems, so that employees with disabilities coming into the workforce can contribute to the workforce and will be able to access similar information and resources as other employees.

5. Reasonable Accommodations
 - a. We will prominently display in our recruitment materials that we will provide reasonable accommodation to qualified individuals with a disability who apply for our positions where needed. All recruitment materials are available in alternate format and the office ensures that physical spaces and technology are accessible to individuals with disabilities.
6. Strategic Partnerships
 - a. The office has built a partnership with DEED - Vocational Rehabilitation Services ("VRS"), to assist in referral of candidates to open classified positions. The office will work to inform VRS when a position is posted or prior to a posting, if possible, about the position.
 - b. The office will maintain contact with a variety of professors at a number of law schools as a method to have faculty recommend the Attorney General's Office to persons with disabilities.
7. Self-Analysis
 - a. The office will conduct periodic self-checks to determine if our systems or documents are accessible, language in our job postings is inclusive, and reasonable accommodations have been provided and staff have been trained on how to provide reasonable accommodations.
8. Reporting
 - a. The office will conduct a quarterly analysis of the number of individuals with disabilities who have applied for classified positions and the number of individuals with disabilities hired in the classified service.

RETENTION PLAN

The office is committed to not just the recruitment of women, minorities, individuals with disabilities, and veterans, but also to the retention of these protected groups. The responsibility for retention efforts lies with all employees, but primary responsibility lies with Sue Vrooman, Affirmative Action Officer/Human Resources Director, sue.vrooman@ag.state.mn.us (651) 757-1057, as well as those individuals specified below.

A. Individuals Responsible for the Office's Retention Program/Activities

RETENTION PLAN

TASK:	Promote retention of protected group members by providing mentoring, training and fostering internal networking.
ACTION:	Identify protected group members and arrange for mentoring, training and fostering internal networking.
ASSIGNMENT:	Deputy attorneys general, division managers, Director of Recruiting and Employee Development.
COMPLETION DATE:	Ongoing.
EVALUATION:	Separation patterns are analyzed annually to determine impact on protected group members.

RETENTION – EXIT INTERVIEW PROCESS

TASK:	Conduct exit interview of employees leaving the office.
ACTION:	Distribute an exit interview questionnaire to all employees leaving the office. Conduct exit interviews with employees.
ASSIGNMENT:	Affirmative Action Officer, Director of Recruiting and Employee Development.
COMPLETION DATE:	As staff leave the Office.
EVALUATION:	Questionnaires are distributed to all employees who terminate employment. Face-to-face exit interviews are conducted. The paper exit surveys are reviewed to determine if there is any pattern to the reasons protected group members leave the office.

B. Separation Analysis by Protected Groups

The Attorney General's Office had a total of 26 resignations during this reporting period. Of that total, two were in the category of professional women. We successfully recruited and hired 17 professional women during this reporting period; however, we will continue to monitor this data and actively recruit in this category. Of the 26 resignations, 5 were minorities. In the underutilized category of Officials/Administrators there was one minority separation, and it was due to retirement. For individuals with disabilities, of the 26 resignations, one was an individual with a disability.

An analysis of resignations in the minority category revealed that three of the five professionals who resigned accepted positions in the private sector at a higher salary. Two individuals relocated to other states. There was no indication of job dissatisfaction; however, we will continue to monitor separations on a quarterly basis in order to address any patterns or identifiable issues in the future.

C. Methods of Retention of Protected Groups

- Promote retention of protected group members by providing coaching opportunities and fostering an internal network of support.
- Continue to conduct exit surveys of all employees leaving the office. Analyze data for common reasons for leaving, and share with leadership. Develop and implement positive changes.
- Ensure accessibility of electronic systems and physical office spaces and equipment.
- Ensure all employees are aware of the Employee Assistance Program available to them.

COMPLAINT OF DISCRIMINATION/HARASSMENT

The information on this form is collected so that the Attorney General's Office may review your complaint under the Office Diversity Policy and to administer that Policy and monitor compliance with it. You are not legally required to provide this information, but the Attorney General's Office may not be able to review your complaint if you do not provide sufficient information. The information collected is private personnel data on you. It will, however, be disclosed, as needed, within the office to the Affirmative Action Officer, appropriate managers or deputies, and the Attorney General. During any investigation the data remains personnel data on you, but it may also be disclosed subject to the limitations imposed by Minn. Stat. § 13.43, subd. 8, to any individual who may have information on the matter, the employee against whom or on whose behalf the complaint is made or to the Minnesota Department of Human Rights or the Equal Employment Opportunity Commission.

NAME/TITLE:

PHONE:

Who is (are) the subject(s) of your complaint?

NAME(S)

TYPE OF DISCRIMINATION OR HARASSMENT:

Race ___ Sex ___ Color ___ Creed ___ Religion ___ Age ___ National Origin ___

Sexual Orientation ___ Marital Status ___ Familial Status ___ Status with Regard to Public Assistance ___ Gender Identity ___

Other (Specify) _____

When did the incident occur? Date: _____ Time: _____

Place:

Describe the incident in detail. If you are reporting an incident on behalf of another, please include that person's name and division in the Office (attach additional sheet(s) if needed):

Were there any witnesses to the incident?

NAME(s)

I certify that the information I provided is true and correct to the best of my ability.

Signature: _____ Date: _____

Received by:

Signature: _____ Date: _____



**STATE OF MINNESOTA – OFFICE OF THE ATTORNEY GENERAL
EMPLOYEE/APPLICANT REQUEST FOR
ADA REASONABLE ACCOMMODATION FORM**

The State of Minnesota is committed to complying with the Americans with Disabilities Act (“ADA”) and the Minnesota Human Rights Act (“MHRA”). To be eligible for an ADA accommodation, you must be 1) qualified to perform the essential functions of your position and 2) have a disability that limits a major life activity or function. The ADA Coordinator/Designee will review each request on an individualized case-by-case basis to determine whether or not an accommodation can be made.

Employee/Applicant Name:	Job Title:
Work Location:	Phone Number:

Data Privacy Statement: This information may be used by your office’s human resources representative, ADA Coordinator or designee, office legal counsel, or any other individual who is authorized by the office to receive medical information for purposes of providing reasonable accommodations under the ADA and MHRA. This information is necessary to determine whether you have a disability as defined by the ADA or MHRA, and to determine whether any reasonable accommodation can be made. The provision of this information is strictly voluntary; however, if you refuse to provide it, the office may refuse to provide a reasonable accommodation.

Questions to clarify accommodation requested.

1. What specific accommodation are you requesting?
2. If you are not sure what accommodation is needed, do you have any suggestions about what options we can explore.
 - a. If yes, please explain.

Questions to document the reason for the accommodation request *(please attach additional pages if necessary).*

Reasonable Accommodation Request Form, Page 2

1. What job function, if any, are you having difficulty performing?
2. What employment benefit, if any, are you having difficulty accessing?
3. What limitation as result of your physical or mental impairment is interfering with your ability to perform your job or access an employment benefit?
4. If you are requesting a specific accommodation, how will that accommodation be effective in allowing you to perform the functions of your job?

Information Pertaining to Medical Documentation

In the context of assessing an accommodation request, medical documentation may be needed to determine if the employee has a disability covered by the ADA and to assist in identifying an effective accommodation.

The ADA Coordinator is tasked with collecting necessary medical documentation. In the event that medical documentation is needed, the employee will be provided with the appropriate forms to submit to their medical provider. The employee has the responsibility to ensure that the medical provider follows through on requests for medical information.

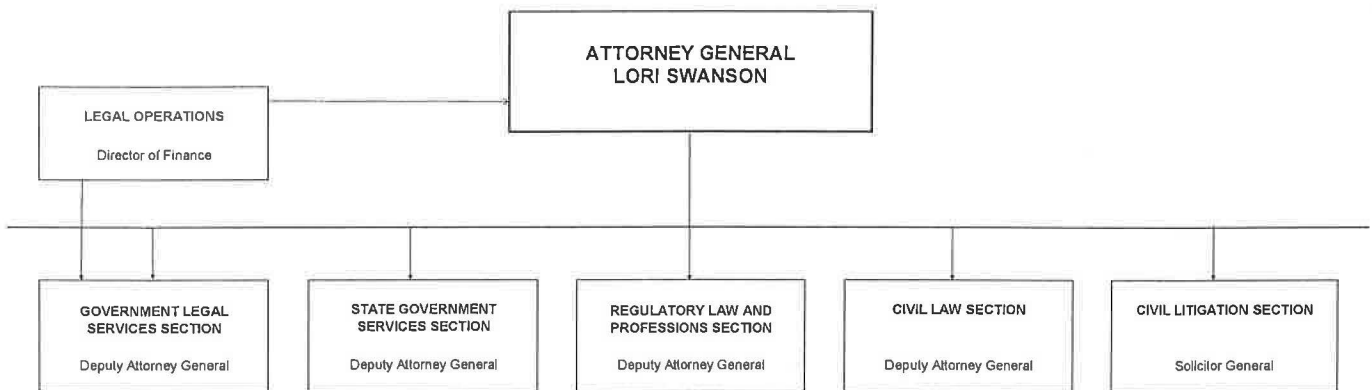
This authorization does not cover, and the information to be disclosed should not contain, genetic information. "Genetic Information" includes: Information about an individual's genetic tests; information about genetic tests of an individual's family members; information about the manifestation of a disease or disorder in an individual's family members (family medical history); an individual's request for, or receipt of, genetic services, or the participation in clinical research that includes genetic services by the individual or a family member of the individual; and genetic information of a fetus carried by an individual or by a pregnant woman who is a family member of the individual and the genetic information of any embryo legally held by the individual or family member using an assisted reproductive technology.

Employee/Applicant Signature:	Date:
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APPENDIX C

OFFICE PROFILE AND ORGANIZATIONAL CHART

The Attorney General is the chief legal officer for the state and is the legal advisor to the Governor and all the constitutional officers. Her duties arise from the constitution, state statutes and common law. Every board, commission and agency of the state receives its legal counsel and representation from the Attorney General. The Attorney General provides legal assistance to local officials, such as county attorneys and sheriffs, in their efforts to enforce laws, and her Criminal Division prosecutes difficult or complex criminal cases at the request of local prosecutors, especially serious crimes against people. She represents and advocates for consumers through specialized divisions focused on consumer protection, charities oversight, antitrust enforcement and utilities regulation. In these areas the Attorney General has focused on privacy issues, protecting the public from unscrupulous businesses, combating scams and fraud targeted at senior citizens, and combating telemarketing fraud. The Attorney General is also a member of the State Executive Council, the State Board of Investment, the Pardon Board and the Land Exchange Board. The Attorney General's staff includes the Solicitor General, four Deputy Attorneys General, Assistant Attorneys General, legal assistants and support staff.



Attorney General's Office

JOB CATEGORY AVAILABILITY/UTILIZATION/UNDERUTILIZATION ANALYSIS & ANNUAL GOALS

Worksheet for comparing incumbency to availability and setting goals to correct underutilization.

WOMEN									
Job Categories	Total Employees in Job Group	Total Number of Women in Group	% of Women in the Group	Availability %	Availability Number	AAP 2016-2018 Number Underutilized	AAP 2014-2016 Underutilized	Improved, Not Improved, Same	Numerical Difference in the Two Plans
Officials/Administrators	29	13	44.83%	39.84%	12	<10	<10	Improved	
Professionals	115	45	39.13%	45.13%	52	<10	<10	Improved	
Paraprofessionals	114	74	64.91%	41.55%	47	<10	<10	Improved	
Office/Clerical	78	77	98.72%	54.90%	43	<10	<10	Improved	
Totals	336	209	62.20%						

MINORITIES									
Job Categories	Total Employees in Job Group	Total Number of Minorities in Group	% of Minorities in the Group	Availability %	Availability Number	AAP 2016-2018 Number Underutilized	AAP 2014-2016 Underutilized	Improved, Not Improved, Same	Numerical Difference in the Two Plans
Officials/Administrators	29	1	3.45%	7.55%	2	<10	<10	Not Improved	
Professionals	115	12	10.43%	8.85%	10	<10	<10	Improved	
Paraprofessionals	114	14	12.28%	7.91%	9	<10	<10	Improved	
Office/Clerical	78	9	11.54%	8.86%	7	<10	<10	Improved	
Totals	336	36	10.71%						

INDIVIDUALS WITH DISABILITIES									
Job Categories	Total Employees in Job Group	Total Number of Individ./ with Disabilities in Group	% of Individ. w/ Disabilities in the Group	Availability %	Availability Number	AAP 2016-2018 Number Underutilized	AAP 2014-2016 Underutilized	Improved, Not Improved, Same	Numerical Difference in the Two Plans
Officials/Administrators	29	7	24.14%	7.00%	2	<10	<10	Improved	
Professionals	115	12	10.43%	7.00%	8	<10	<10	Improved	
Paraprofessionals	114	13	11.40%	7.00%	8	<10	<10	Improved	
Office/Clerical	78	13	16.67%	7.00%	5	<10	<10	Improved	
Totals	336	45	13.39%						

Source: American Fact Finder, operated by the U.S. Census Bureau. Labor Statistics for women and minorities compiled from the American Community Survey (2006-2010)., released in March of 2013. Statistics for individuals with disabilities are taken from OFCCP (Office of Federal Contract Compliance Programs) and are based upon data derived from the American Community Surveys (2006-2010).

Attorney General's Office
SEPARATION ANALYSIS

Worksheet for conducting separation analysis of protected group members as total separations and in each job category.

TOTAL SEPARATIONS								
Types of Separation	Total Number	Total Percentage	Total Number of Women	Percentage of Women	Total Number of Minorities	Percentage of Minorities	Total Number of Indiv w/Disabilities	Percentage of Indiv w/Disabilities
Dismissal or Non-Certification	1	2.38%	1	100.00%	1	100.00%	0	0.00%
Resignations	26	61.90%	14	53.85%	5	19.23%	1	3.85%
Retirement	12	28.57%	8	66.67%	1	8.33%	1	8.33%
Lay-off	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Termination without Rights	3	7.14%	1	33.33%	2	66.67%	0	0.00%
Total Separations	42	100.00%	24	57.14%	9	21.43%	2	4.76%

OFFICIALS/ADMINISTRATORS								
Types of Separation	Total Number	Total Percentage	Total Number of Women	Percentage of Women	Total Number of Minorities	Percentage of Minorities	Total Number of Indiv w/Disabilities	Percentage of Indiv w/Disabilities
Dismissal or Non-Certification	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Resignations	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Retirement	1	100.00%	0	0.00%	1	100.00%	1	100.00%
Lay-off	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Termination without Rights	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total Separations	1	100.00%	0	0.00%	1	100.00%	1	100.00%

PROFESSIONALS								
Types of Separation	Total Number	Total Percentage	Total Number of Women	Percentage of Women	Total Number of Minorities	Percentage of Minorities	Total Number of Indiv w/Disabilities	Percentage of Indiv w/Disabilities
Dismissal or Non-Certification	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Resignations	7	63.64%	2	28.57%	3	42.86%	0	0.00%
Retirement	4	36.36%	1	25.00%	0	0.00%	0	0.00%
Lay-off	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Termination without Rights	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total Separations	11	100.00%	3	27.27%	3	27.27%	0	0.00%

Attorney General's Office

SEPARATION ANALYSIS

Worksheet for conducting separation analysis of protected group members as total separations and in each job category.

PARAPROFESSIONALS								
Types of Separation	Total Number	Total Percentage	Total Number of Women	Percentage of Women	Total Number of Minorities	Percentage of Minorities	Total Number of Indiv w/Disabilities	Percentage of Indiv w/Disabilities
Dismissal or Non-Certification	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Resignations	16	76.19%	9	56.25%	2	12.50%	1	6.25%
Retirement	2	9.52%	2	100.00%	0	0.00%	0	0.00%
Lay-off	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Termination without Rights	3	14.29%	1	33.33%	2	66.67%	0	0.00%
Total Separations	21	100.00%	12	57.14%	4	19.05%	1	4.76%

OFFICE/CLERICAL								
Types of Separation	Total Number	Total Percentage	Total Number of Women	Percentage of Women	Total Number of Minorities	Percentage of Minorities	Total Number of Indiv w/Disabilities	Percentage of Indiv w/Disabilities
Dismissal or Non-Certification	1	11.11%	1	100.00%	1	100.00%	0	0.00%
Resignations	3	33.33%	3	100.00%	0	0.00%	0	0.00%
Retirement	5	55.56%	5	100.00%	0	0.00%	0	0.00%
Lay-off	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Termination without Rights	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total Separations	9	100.00%	9	100.00%	1	11.11%	0	0.00%