
State of Minnesota

Department of Employment and Economic Development

Affirmative Action Plan for July 1, 2024 – June 30, 2026

Department of Employment and Economic Development

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As requested by Minnesota Statute 3.197: This report cost approximately \$6,000 to prepare, including staff time, printing, and mailing expenses.

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Statement of Commitment


Minnesota Administrative Rules, part 3905.0400, subpart 1, item C.

This statement reaffirms *the Department of Employment and Economic Development (hereafter “the agency”)* is committed 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, or subject to harassment, on the basis of race, sex (including pregnancy), color, creed, religion, age, national origin, sexual orientation, gender expression, gender identity, disability, marital status, familial status, status with regard to public assistance, or membership or activity in a local human rights commission.
- The prohibition of discrimination on the basis of sex precludes sexual harassment, gender-based harassment, and harassment based on pregnancy.
- This agency 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, and selection for training, including apprenticeship. We will provide reasonable accommodation to employees and applicants with disabilities.
- This agency will continue to actively promote a program of affirmative action wherever *females, persons with disabilities and racial/ethnic minorities* are underrepresented in the workforce, and work to retain all qualified, talented employees, including protected group employees.
- This agency will evaluate its efforts, including those of its directors, managers, and supervisors, in promoting equal opportunity and achieving affirmative action objectives contained herein. In addition, this agency will expect all employees to perform their job duties in a manner that promotes equal opportunity for all.

It is the agency’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 all Minnesotans.

Commissioner:  _____

Date Signed: 02/07/2025

Executive Summary

Minnesota Administrative Rules, part 3905.0400, subpart 1, item A.

This Affirmative Action Plan (AAP) meets the requirements set forth in Statutes, in Administrative Rules and by Minnesota Management and Budget (MMB). The AAP contains:

- Affirmative action workforce analysis.
- Goals, objectives and timetables; and
- Assertive hiring, recruitment and retention methods for achieving goals and objectives.

This Affirmative Action review revealed underutilization of the following protected group(s) in the following job categories:

Table 1. Workforce Underutilization of Protected Groups

(The letter x indicates the job categories and protected groups that have underutilization. A dash (–) indicates where there is no underutilization.)

Job Category	Females	Persons with Disabilities	Racial or Ethnic Minorities
Officials and Managers			
Professionals			
Technicians			
Paraprofessionals	X		
Administrative Support			
Service Maintenance		X	X

Affirmative Action Officer: *Heather Stein*

Date Signed: 1/30/2025

Human Resources Director: *Clyde K. Har*

Date Signed: 1/31/2025

Commissioner: *Mark*

Date Signed: 02/07/2025

Organizational Profile

The Minnesota Department of Employment and Economic Development (DEED) is the state's principal economic development agency. DEED programs promote business recruitment, expansion and retention; international trade; workforce development; and community development.

The agency facilitates an economic environment to produce jobs and improve the quality of the state's workforce and manages over 60 programs and the services to support them throughout the state.

DEED's mission is to empower the growth of the Minnesota economy, for everyone. To meet that mission, we partner with organizations and communities across the state to take on the challenges our economy faces at this critical inflection point in Minnesota. The agency is currently working hard to reach Minnesotans from all backgrounds and to connect with populations in Minnesota hit hardest by racial and other disparities in employment – including gender, sexual orientation, geography, race/ethnicity, national origin, color, disability, age or other protected groups.

Service Delivery Model

DEED is committed to helping create equitable communities and economic opportunities and will tailor our statewide outreach and service delivery model based on different community strengths around the state.

DEED provides direct service to its customers via staff located throughout the state. It leverages its resources by contracting with vendors or partners to deliver services that help DEED achieve its mandate. And, to incent innovation, DEED awards grants to qualified entities to deliver service in a new way or resolve unmet needs.

Specialists market Minnesota to attract new business and help develop existing or start-up businesses. Community development staff address revitalization issues and prepare for economic development opportunities.

There are nearly 55 CareerForce locations where people looking for jobs can find employment and career assistance. An online job bank—MinnesotaWorks.net—connects job seekers and employers. Unemployment Insurance benefits are available for people who have lost their jobs through no fault of their own. In addition, DEED's labor market information helps all customers make educated decisions about their futures.

Mission:

To empower the growth of the Minnesota economy for everyone.

Values:

Focus on the customer. We are public servants who strive for fairness and results for the people, businesses, and communities of Minnesota. We build authentic relationships. We listen to the people we serve and consider their feedback in our service delivery.

Communicate early and often. We believe in effective communication, honesty, and good listening. Great work happens when everyone is clear on where we're heading, and who is doing what. We strive for transparency with the public and our stakeholders.

Seek solutions. When a challenge arises, we collaborate across teams and brainstorm ways to solve it. We focus on impact. We choose optimism, and get things done.

Create inclusion. We actively remove barriers that have historically left people out. We believe we're far stronger when we are inclusive and equitable. We respect opinions that are different than ours and we seek out diverse perspectives in the planning and execution of our work.

Encourage new ideas. We celebrate and encourage creative thinking, giving ourselves the permission to think boldly. We believe it is okay to try a new approach; it's the only way to learn and improve.

Be gracious. We're honored to serve the people of Minnesota. We approach our work with respect and kindness towards those we work with and for. We elevate each other. Bringing joy to our jobs makes DEED a great place to work.

Individuals Responsible for Directing and Implementing the Affirmative Action Plan

Minnesota Administrative Rules, section 3905.0400, subpart 1, item B.

A. Commissioner

Responsibilities

The Commissioner is responsible for establishing an Affirmative Action Plan, including goals, timetables and compliance with all federal and state laws and regulations. Quarterly, the Commissioner reports the agency's progress in meeting its affirmative action goals and objectives to the Commissioner of Minnesota Management & Budget (MMB). The Commissioner, through the Commissioner of MMB, will report annually to the Governor and the Legislature the agency's progress in meeting its affirmative action goals and objectives.

Duties

The duties of the Commissioner include, but are not limited to:

- Appoint the Affirmative Action Officer or designee and include accountability for the administration of the agency's Affirmative Action Plan in their position description.
- Take action, if needed, on complaints of discrimination and discriminatory harassment.
- Issue a statement affirming the department's commitment to affirmative action and equal employment opportunity and ensure the statement is shared with all employees.
- Make decisions and changes in policies, procedures or physical accommodations as needed to implement effective affirmative action in the agency.
- Actively promote equal employment opportunity and incorporate diversity and inclusion principles in annual business plans, strategic plans and the agency's mission.
- Notify all contractors and sub-contractors with the department of their affirmative action responsibilities.
- Enforce equal employment opportunity in affirmative and non-affirmative hiring decisions reviewed in the hiring process.
- Require that all agency directors, managers, and supervisors include responsibility statements to support affirmative action, equal opportunity, diversity and cultural responsiveness in their position descriptions and annual objectives.
- Comply with state-wide and agency anti-discrimination and anti-harassment policies.

Accountability

The Commissioner is accountable directly to the Governor and indirectly to the Commissioner of MMB for affirmative action matters.

Name of individual(s) responsible

Name: Matt Varilek

Email: Matt.Varilek@state.mn.us

Title: Commissioner

Phone: 651.259.7114

B. Affirmative Action Officer

Responsibilities

The Affirmative Action Officer is directly responsible for developing, coordinating, implementing and monitoring the agency's affirmative action plan.

Duties

The duties of the Affirmative Action Officer include, but are not limited to:

- Develop and administer the agency's Affirmative Action Plan.
- Develop and set agency-wide affirmative action hiring goals.
- Monitor agency compliance and fulfill all affirmative action reporting requirements.
- Disseminate the affirmative action policy to employees in the agency.
- Inform the Commissioner of progress on affirmative action and equal opportunity goals and report potential concerns.
- Act as the affirmative action liaison between the agency, MMB and the Governor's Office.
- Determine the need for affirmative action training within the agency. Develop training goals and content with internal and external resources.
- Review and recommend changes in policies, procedures, programs and physical accommodations to implement affirmative action and equal opportunity.
- Develop innovative programs to attract and retain individuals from protected groups in the agency.
- Support and recruit females, persons with disabilities and racial or ethnic minorities for employment, promotion and training opportunities.
- Manage the agency's pre-hire review process. Review requests for non-affirmative hires in the Monitoring the Hiring process and refer unresolved issues to the Commissioner for final decision.
- Ensure supervisors and managers are making good faith efforts to recruit and retain qualified candidates and employees from protected groups.
- Oversee the administration of the Americans with Disabilities Act Title I and Title II.
- Maintain records of requests for reasonable accommodations.
- Provide guidance to the Human Resources Director for alignment of the agency Diversity Recruitment program with the Affirmative Action Plan.
- Comply with state-wide and agency anti-discrimination and anti-harassment policies.

Accountability

The Affirmative Action Officer is accountable to the Commissioner for program impacts and for ongoing program activities and direction. The Affirmative Action Officer oversees the administration of ADA Title II, manages diversity and inclusion initiatives, and other equal opportunity related matters. In addition, the AAO ensures that aggregate data and trends of complaints of illegal discrimination in hiring are provided and shared with the Human Resources Director on a quarterly basis.

Name of individual(s) responsible

Name: Heather Stein

Email: Heather.Stein@state.mn.us

Title: Director of Diversity and Equal Opportunity

Phone: 651.259.7097

C. Human Resources Director

Responsibilities

The Human Resources (HR) Office is responsible for ensuring equitable and uniform administration of all personnel policies. The HR Director is responsible for assisting managers and supervisors in human resources management activities.

Staff within HR who work on affirmative action and diversity issues are accountable to the HR Director or Designee.

Duties

The duties of HR Director include, but are not limited to:

- Maintain effective working relationships with the agency Affirmative Action Officer and designees.
- Provide leadership to HR staff and others to ensure personnel decision-making processes adhere to equal opportunity and affirmative action principles.
- Provide guidance in the development and use of selection criteria to ensure they are objective, uniform and job related.
- Assist in recruitment and retention of protected groups and notify managers and supervisors of existing disparities.
- Ensure an Affirmative Action Pre-hire Review process is implemented and followed by hiring managers and supervisors in collaboration with the Affirmative Action Officer.
- Initiate and report on progress made with program objectives contained in the Affirmative Action Plan.
- Ensure that the reasonable accommodation process is adhered to by HR personnel.
- Assist supervisors, managers and the Affirmative Action Officer in the recruitment of protected group members through career and job fairs and other efforts, as well as in selection and retention of protected group members.
- Assist supervisors, managers, the Affirmative Action Officer and HR staff in the creation of supported worker positions. These positions help reduce agency costs by diverting supportive employment duties from higher skilled workers to supported worker positions. This can improve employee morale and retention of persons with disabilities in integrated employment.
- Request assistance from MMB to support diversity recruitment efforts, as well as the retention of protected group members in hard-to-fill or executive level positions.
- Include responsibility statements for affirmative action/equal employment opportunity in position descriptions and annual performance objectives.
- Comply with state-wide and agency anti-discrimination and anti-harassment policies.

Accountability

HR staff are accountable to the HR Director. The HR Director is accountable to the Commissioner.

Name of individual(s) responsible

Name: Elizabeth Howe

Email: Elizabeth.K.Howe@state.mn.us

Title: Human Resources Director

Phone: 651.259.7685

D. Americans with Disabilities Act Title I Coordinator

Responsibilities

The Americans with Disabilities Act (ADA) Title I Coordinator is responsible for ensuring the agency's compliance with the ADA Title I – Employment, in accordance with the ADA as amended, and the Minnesota Human Rights Act.

Duties

The duties of the ADA Title I Coordinator include, but are not limited to:

- Provide guidance, coordination and direction to agency management on the ADA. The agency develops and implements policies, procedures and practices to ensure agency employment practices and programs are accessible and nondiscriminatory.
- Provide training, technical guidance and consultation to agency management and staff on compliance and best practices for hiring and retaining persons with disabilities, as well as the provision of reasonable accommodations to employees and job applicants.
- Track and facilitate requests for reasonable accommodations for job applicants and employees, as well as members of the public accessing agency services and report reasonable accommodations annually to MMB.
- Research case law rules and regulation and update Director of Diversity and Equal Opportunity (ODEO) on evolving ADA issues.
- Meet bi-annually with ADA Coordinators and provide updates on ADA.
- Ensure compliance with ADA reporting according to state and federal requirements.
- Assist the Affirmative Action Officer in designing and delivering specific ADA training for targeted groups.
- Submit reasonable accommodation reimbursement under the guidelines of the state-wide accommodation fund.
- Receive requests for ADA accommodations and work with appropriate supervisors, unions, etc., to approve or deny the request, or provide alternative accommodations.
- Provide reasonable accommodations to qualified individuals (as defined by ADA) with known physical or mental disabilities, to enable them to compete in the selection process, perform essential functions of the job, and/or enjoy equal benefits and privileges. The ADA Coordinator, in consultation with the employee, supervisor and other individuals involved must:
 - Discuss the purpose and essential functions of the job and complete a step-by-step job analysis.
 - Determine the precise job-related limitations.
 - Identify potential accommodations and assess the effectiveness each would have in allowing the employee to perform essential functions of the job; and

- After discussion and review, select and implement the accommodations that are appropriate for both the employee and the employer using the Reasonable Accommodation Agreement.
- Comply with state-wide and agency anti-discrimination and anti-harassment policies.

Accountability

The ADA Title I Coordinator is accountable to the Director of Diversity and Equal Opportunity.

Name of individual(s) responsible

Name: Karen Lilledahl

Email: Karen.Lilledahl@state.mn.us

Title: ADA Coordinator/WIOA Equal Opportunity Compliance Manager

Phone: 651.259.7089

E. Americans with Disabilities Act Title II Coordinator

Responsibilities

The Americans with Disabilities Act (ADA) Title II Coordinator is responsible ensuring the agency’s compliance with the ADA Title II – Public Services, in accordance with the ADA as amended, and the Minnesota Human Rights Act.

Duties

The duties of the ADA Title II Coordinator include, but are not limited to:

- Provide guidance, coordination and direction to agency management on the ADA. The agency develops and implements policies, procedures and practices to ensure agency employment practices and programs are accessible and nondiscriminatory.
- Provide training, technical guidance and consultation to the agency’s management and staff on compliance and best practices with regards and obligations to members of the public with disabilities, as well as the provision of reasonable modifications for visitors.
- Track and facilitate requests for reasonable modifications for members of the public accessing agency services. Report reasonable modifications annually to MMB.
- Research case law rules and regulation and update ODEO Director on evolving ADA issues.
- Meet monthly with state ADA Coordinators.
- Ensure compliance with ADA reporting according to state and federal requirements.
- Assist the Affirmative Action Officer in designing and delivering training for agency employees assisting ADA modifications for the public.
- Provide reasonable modifications to members of the public (as defined by ADA) with known physical or mental disabilities to ensure equal access and privileges to programming and services. The ADA Title II Coordinator will consult with the member of the public in need of a modification and:
 - Discuss the purpose and essential functions of the reasonable modification.

- Identify the potential modifications and assess the effectiveness each request.
- After discussion and review, select and implement the modifications that are appropriate for both the member of the public and the agency; and
- Document this review and reported in the State ADA Annual Report.
- Comply with state-wide and agency anti-discrimination and anti-harassment policies.

Accountability

The ADA Title II Coordinator is accountable to the Director of Diversity and Equal Opportunity.

Name of individual(s) responsible

Name: Karen Lilledahl

Email: Karen.Lilledahl@state.mn.us

Title: ADA Coordinator/WIOA Equal Opportunity Compliance Manager

Phone: 651.259.7089

F. Senior Managers and Executive Team Leaders

Responsibilities

Agency senior managers and executive team leaders are responsible for implementing all aspects of the agency Affirmative Action Plan and the agency’s commitment to affirmative action and equal opportunity.

Duties

The duties of senior managers and executive team leaders include, but are not limited to:

- Identify problem areas and eliminate barriers that prevent equal employment opportunity within the agency.
- Communicate the equal opportunity employment policy and the affirmative action plan to all employees.
- Assist the Affirmative Action Officer in periodic audits of hiring and promotion patterns to remove obstacles to attaining affirmative action goals and objectives.
- Hold regular discussions with supervisors and employees to ensure the agency’s equal employment opportunity policies are being followed.
- Inform and evaluate managers and supervisors on their equal employment opportunity efforts and results, in addition to other job performance criteria.
- Comply with statewide and agency anti-discrimination and anti-harassment policies.

Accountability

Senior managers and executive team leaders are accountable directly to the appropriate Assistant Commissioner, the Deputy Commissioner or the Commissioner.

G. All Employees

Responsibilities

All employees are responsible for conducting themselves in accordance with the State of Minnesota's policy of equal employment opportunity. This includes refraining from any actions that would subject any employee or third party to negative treatment on the basis of race, color, creed, religion, national origin (including limited English proficiency), sex (including pregnancy, childbirth and related medical conditions, sex stereotyping, sexual orientation or gender identity), marital status, familial status, disability, use of public assistance, age, gender expression, membership or activity in a local human rights commission, political opinions or affiliations, genetic information, or retaliation. Employees who believe they have been subjected to such discrimination or harassment are encouraged to use the agency's complaint procedure.

Duties

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

- Exhibit an attitude of respect, courtesy and cooperation toward colleagues and the public.
- Comply with state-wide and agency anti-discrimination and anti-harassment policies.

Accountability

Employees are accountable to their designated supervisor and indirectly to the agency's Commissioner. All employees are responsible for conducting themselves in accordance with the Affirmative Action Plan.

Communication of the Affirmative Action Plan

Minnesota Administrative Rules, section 3905.0400, subpart 1, item D and item E.

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

Internal Methods of Communication

- **Internal memorandum.** Agency leadership or the Affirmative Action Officer will send an internal memo to agency employees each year. This message identifies the location of the Affirmative Action Plan and the employee's responsibility to read and understand it. It also indicates the employee's responsibility to support and implement equal opportunity and affirmative action.
- **Internet.** The agency's Affirmative Action Plan is available to all employees on the [agency's external website](https://mn.gov/deed/about/what-we-do/agency-results/aa-plan/) (<https://mn.gov/deed/about/what-we-do/agency-results/aa-plan/>) and in print to anyone who requests it. As requested, the agency will make the plan available in alternative formats.
- **Printed copy.** A physical copy of the Agency's Affirmative Action Plan is available to employees at the following address:

180 East Fifth Street, 12th Floor, St. Paul, MN 55101
- **New Employee Orientation.** The Office of Diversity and Equal Opportunity informs new employees of DEED's commitment to Affirmative Action and Equal Employment Opportunity during the required New Employee Orientation (NEO) called 'Living DEED's Values.' The NEO includes information about the process to follow for requesting and/or providing a reasonable accommodation for a person with a

disability and the process for discussing and/or filing a complaint of discrimination, as well an overview of diversity, equity, inclusion and access.

- **Policies and Procedures.** All Affirmative Action and Equal Employment Opportunity policies, procedures and practices are included in DEED’s Policy and Procedures Manual. The Policy and Procedures Manual is updated routinely and is available on the [DEED Intranet](https://mn365.sharepoint.com/sites/DEED-DEN/SitePages/Agency-Resources.aspx) (<https://mn365.sharepoint.com/sites/DEED-DEN/SitePages/Agency-Resources.aspx>).
- **Signage.** Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented and accessible to employees in all Minnesota CareerForce Centers and DEED locations. ODEO oversees the statement and notice requirements at all DEED locations and provides updates as laws are revised or implemented.

External Methods of Communication

- **Public website.** The agency’s Affirmative Action Plan is available on the [agency’s public website](https://mn.gov/deed/about/what-we-do/agency-results/aa-plan/) (<https://mn.gov/deed/about/what-we-do/agency-results/aa-plan/>). Printed copies are available to anyone who requests it. As requested, the agency will make the plan available in alternative formats to individuals with disabilities.
- **Equal opportunity employer language.** The agency’s website homepage, letterhead, publications and all job postings include the statement “*DEED is an equal opportunity employer and service provider.*” The agency will also ensure a representative ratio of diversity is on all marketing materials.
- **Physical Copies.** A physical copy of the Agency’s Affirmative Action Plan is available to contractors, vendors and members of the public at the following address:

180 East Fifth Street, 12th Floor, St. Paul, MN 55101
- **Client Forms.** DEED requires that all client forms, brochures, handouts and advertising have the wording “Equal Opportunity Employer and Service Provider” statement and reference to Babel Notice.
- **Nondiscrimination Plan.** Information about the Affirmative Action and Equal Opportunity policies and contract assurance requirements are provided to all individuals and organizations receiving grants or funding from DEED. The contract assurance requirements contain inclusive language identifying all state and federal civil rights legislation. All contracts are reviewed to ensure inclusion of equal opportunity language.

Workforce Composition Analysis

Minnesota Administrative Rules, part 3905.0600, subpart 2, items A to C, subpart 3, items A to D, subpart 4. Subpart 5, and subpart 6.

Job Category Review

The agency conducted a Job Category Analysis to determine the percent of protected group employees in each job category. The job category analysis lists job class titles in each Equal Employment Opportunity (EEO) job category at the agency. A job classification is a group of one or more positions with similar duties and responsibilities. These classifications help clarify positions within the class so the same schedules of pay can be applied with equity to all positions in the class that fall under the same, or substantially the same, employment conditions.

Determining Availability

The agency used the United States Census Bureau’s EEO Tabulation 2014-2018 American Community Survey (ACS) statistical data for external availability. The feeder job statistics of employees are used for internal availability (refer to Appendix D. Feeder Jobs for details).

These external and internal factors are weighted according to the agency’s past hiring patterns and/or future recruitment focus to obtain the final availability (Refer to Appendix E. Determining Availability for details).

Progress Reports

The progress report examines hiring goals established in the prior Affirmative Action Plan. As a part of the agency’s monitoring practices, the agency evaluated if it met the hiring goal(s) established in the prior Affirmative Action Plan (refer to [Appendix A. Progress Report](#)).

[Appendix A. Progress Report](#) includes only job categories that have hiring goal(s) established in the prior Affirmative Action Plan and it evaluates if the agency attained the hiring goal(s).

Where the indication of the “Goal Met?” column is:

- “Yes”: the agency met the goal established in the prior Affirmative Action Plan.
- “No”: the agency did not attain the goal established in the prior Affirmative Action Plan.
- “No Hire/Prom”: there were no opportunities in the prior Affirmative Action Plan period.

Table 2. Progress Report from 2022-2024 Affirmative Action Plan

Job Category	Females	Persons with Disabilities	Racial or Ethnic Minorities
Officials and Managers			
Professionals			
Technicians			
Administrative Support			
Service Maintenance			Hiring goals not met

DEED did not meet its hiring goal for racial or ethnic minorities or persons with disabilities in the service maintenance category. The service maintenance category consists of only 15 employees. While we hired 13

employees during the 2022-2024 fiscal years, none of those hired self-identified as racial or ethnic minorities. Six (6) of the hires did not disclose their racial or ethnic identity or disability status. Most of the positions filled within the service maintenance category were automobile drivers, a critical position within our State Services for the Blind division. We were severely understaffed and there was an immediate need to fill these positions. Therefore, we utilized one job posting to fill all positions and received applications on a continuous basis. All applicants who met the minimum qualifications were interviewed as their applications were received.

Separations Analysis

[Appendix B. Separation Analysis](#) shows the results by separation type and the protected group during the *prior* affirmative action plan period to evaluate and identify potential action area(s) for retention strategies for the 2024-2026 plan year.

Table 3. Separation Analysis

Separation Type	Females	Persons with Disabilities	Racial or Ethnic Minorities
Dismissal or Non-Certification	62.50%	37.50%	50.00%
Resignation	64.15%	22.01%	23.27%
Enhanced Separation	0.00%	0.00%	0.00%
Retirement	74.29%	12.86%	2.60%
Death	75.00%	12.50%	12.50%
Lay-off	83.33%	16.67%	33.33%
Termination without Rights	61.33%	13.33%	30.67%
Total Separations	66.08%	19.01%	22.51%

Overall Separations Analysis

In fiscal years 2023 and 2024 the agency had 342 total separations. Of these, the number of retirements, deaths and terminations without rights accounts for 45% of separations. The agency had 183 separations through resignation or dismissal/non-certification. Because resignations and dismissals/non-certifications can be influenced through strategic agency plans focused on retention, selection, on-boarding and performance management, the separation analysis below focuses on these two separation types.

The ODEO reviewed the separation data for FY 2023 and FY 2024 for trends and potential concerns. Initial findings demonstrate:

- Of the total number of separations for dismissals and non-certifications, the rates are disproportionate for employees who identify as racial or ethnic minorities. With a total of 24 non-certifications and dismissals, racial or ethnic minorities made up 50% of all dismissals and non-certifications during this plan period. The ODEO and HR will conduct a deeper analysis to review each case to identify potential patterns and respective interventions.
- Females are separating in each job category at slightly higher rates than in the previous Affirmative Action Plan.

Females

Females represent approximately 68.82% of the total agency workforce. The agency saw a total of 342 separations from FY 2023 and FY 2024. Females were 66.08% of all separations. This is proportionately relative, and slightly lower than the agency's total workforce representation. While the proportion of females at DEED decreased 1% from 2022-2024, the total number of separations increased by 4.41%.

Females in the professional job category separated the agency through dismissals/non-certifications at a rate of 60%, which is less than their representation in the agency (67.96%) in this job category. Females in the office/clerical job category leave the agency through resignations at a lower rate (61.54%) as compared to their representation in the agency (82.78%) in this job category. Females in the service maintenance job category separated via resignations at a lower rate (16.67%), than their representation in the job category (31.25%). Females in the officials and administrators job category separated via retirement at a rate of 57.14% and via resignation at a rate of 61.54%, both of which are at a lower rate than their representation in the job category (65.22%).

Persons with Disabilities

Persons with disabilities represent approximately 21.6% of the total agency workforce, which is significantly more than the 16.02% reported in the previous Affirmative Action Plan. The agency saw a total of 342 separations from FY 2023 and FY 2024. Persons with disabilities made up 19.01% of all separations, which is lower than the total representation of 21.60%. This shows that, overall, DEED is doing better at retaining its employees with disabilities.

However, when the various separation types are examined, there is an increase in the percentage of separations across all separation types from the last plan for individuals with disabilities, except for retirements. Notably, separations via dismissals/non-certifications are up from the previous rate of 7.14% to 37.50%, and from 15.03% to 22.01% for resignations. This indicates that as the number of employees with disabilities has increased, so has the rate of separation. Further examination is needed to determine the impact of these increases in separation.

In addition to increasing the number of persons with disabilities in the Service Maintenance category, we need to monitor the hiring and retention of persons with disabilities in the Paraprofessionals category to avoid an underutilization in the future.

Racial or Ethnic Minorities

Data indicates that representation of racial or ethnic minorities has continued to improve in all job categories besides the service maintenance job category. Racial or ethnic minorities represent approximately 19.17% of the total agency workforce, which is increased from the last plan year. The agency saw a total of 342 separations during FY 2023 and FY 2024. Employees who identify as racial or ethnic minorities make up 22.51% of all separations, which is like previous plan years, and 26.00% of all hires, which is 2% fewer than in the previous plan year. While separations are higher than the agency's total representation, it is less than the percent hired, meaning that the number of racial or ethnic minorities leaving the agency is lower than the number entering the agency, indicating increased retention. That said, employees who identify as racial or ethnic minorities account for half of all dismissals/non-certifications which is disproportionately higher compared to other protected categories.

Employees who identified as racial or ethnic minorities make up 24.71% of those who separated in the professional job category while their representation in the professional job category is only 18.56%. Notably, 26.02% of all resignations in the professional category are by employees who identify as racial or ethnic minorities. This shows that while there are more professionals who identify as racial and ethnic minorities

with the agency than there were in previous years, employees in this protected class group are still leaving at a higher rate in the professional category, and this requires targeted attention.

Utilization and Comparison of Employees to Availability

Utilization is an analysis of affirmative action and equal opportunity employment data used to assess the available workforce for a given state.

Underutilization Analysis worksheets are attached in the appendices. Numbers less than 10 are indicated with “<10” in accordance with Minnesota Management and Budget’s guidance on data privacy.

Through the utilization and availability analysis, the agency has determined which job categories are underutilized for females, persons with disabilities and racial or ethnic minorities in the agency and has set hiring goals for the next two years. Hiring goals are objective and used for making good faith efforts for all aspects of the affirmative action plan. Effective hiring goals are strategic, actionable and measurable efforts the agency is committed to pursuing and implementing in 2024-2026.

The goals are not quotas, nor do they require protected group status-based hiring preferences. They are aspirational goals so that the agency makes good faith efforts to remove barriers to equal employment opportunity.

The agency used the whole person rule to establish a hiring goal. This means when the actual representation percentage of females, persons with disabilities and racial or ethnic minorities is less than reasonably would be expected given the workforce participation in the labor market area or reasonable recruitment area and that difference is at least one whole person (more than 1), then a goal is established for that job category.

When a hiring goal for a job category is established, a percentage goal equals to the final availability percentage is calculated for females, persons with disabilities and racial or ethnic minorities in that job category.

In Appendix F. the Utilization Goals indicates if a job category by protected group is underutilized.

Area(s) in the agency’s workforce that require further monitoring appear in the “Establish Goals?” column as:

- “Yes”: there is underutilization.
- “Monitor”: the agency needs to monitor the job it may be underutilized where employee movement occurs.

In Table 4. Hiring Goals by Job Category and Protected Group, if a protected group in a job category shows “Monitor,” the agency will proactively make good faith efforts to recruit external qualified protected groups. The agency will also train and retain employees in the job category to help prevent underutilization due to an employee move or attrition.

Refer to Appendix F. Utilization-Goals for details for underutilization and hiring goals. [

The agency has a summary of hiring goals by job category and protected group. The actions the agency will take to address these hiring goals will be described in the goals, objectives and timetables section.

Table 4. 2024-2026 Hiring Goals by Job Category and Protected Group

Job Category	Females	Persons with Disabilities	Racial or Ethnic Minorities
Officials and Managers	-	-	-
Professionals	-	-	-
Technicians	-	-	-
Paraprofessionals	Yes	Monitor	-
Administrative Support	-	-	-
Service Maintenance	-	Yes	Yes

Goals, Objectives, and Timetables

Minnesota Administrative Rules, section 3905.0400, subpart 1, item G and item H, Minnesota Administrative Rules, section 3905.0600, subpart 4, subpart 5, and subpart 6.

Goals:

This Affirmative Action Plan shall establish goals for each goal unit by protected group. The goals must be based on a comparison of the composition of the agency or agency subdivision work force with the composition of the relevant civilian labor force in an identified labor market area. If the comparison shows that a goal unit underutilizes a protected group, the agency head shall establish a goal for that group in that goal unit.

Definition: Goal is a broad statement about the long-term expectation of what should happen as a result of your program (the desired result). Serves as the foundation for developing your program objectives.

Objectives:

The agency's affirmative action plan will identify and describe the methods for developing programs and program objectives designed to meet affirmative action goals, and it will implement the provisions of this affirmative action plan and meet requirements found in the Action-Oriented Programs that are carried out throughout this affirmative action plan period.

Definition: Objectives are statements describing the results to be achieved, and the manner in which they will be achieved. You usually need multiple objectives to address a single goal.

Timetables:

This Affirmative Action plan also establishes timetables for meeting goals and objectives. Timetables must be based on turnover and hire rates within each goal unit in the agency or within each agency subdivision.

Goals, Objectives, and Timetables by Protected Group

Females:

Goals	Objectives	Timetables
Increase the number of females in the paraprofessionals job category.	<p>Develop a proactive process to anticipate hiring needs in the paraprofessionals job category and intentional diversity recruitment strategy to increase the representation of females in this category.</p> <p>It is important to note that Paraprofessionals were included in the office/clerical total in previous plan years, so there were no prior underutilizations in this group.</p>	July 31, 2025

Persons with Disabilities:

Goals	Objectives	Timetables
Increase the number of persons with disabilities in the service maintenance job category.	Develop a proactive process to anticipate hiring needs in the service and maintenance job category and intentional diversity recruitment strategy to increase the representation of persons with disabilities in this category.	July 31, 2025

Racial or Ethnic Minorities:

Goals	Objectives	Timetables
Increase number of racial and ethnic minorities in the service maintenance job category to meet or exceed availability.	Develop a proactive process to anticipate hiring needs in the service and maintenance job category and intentional diversity recruitment strategy to increase the representation of racial and ethnic minorities in this category.	July 31, 2025

Barriers to Achieving Goals and Objectives:

The agency has constraints to address underutilization and areas for monitoring identified in the previous section.

- There is no opportunity to promote within the paraprofessionals category and we anticipate less than ten open positions in this plan year.
- There is no opportunity to promote within the service maintenance category and we anticipate a limited number of open positions in this plan year.
- The service maintenance positions are hard to fill due to the unique requirements of the job.
- Unwillingness of applicants to self-identify their racial or ethnic category. This will affect the representation of racial and ethnic employees in this protected group.

Recruitment, Retention, and Training

Minnesota Statutes 2023, section 43A.191, subdivision 3, (c), (1) and (2).

Recruitment

The agency will demonstrate a good faith effort to build a coordinated plan to recruit and retain qualified females, persons with disabilities and racial or ethnic minorities.

- The agency posts vacant positions on a variety of job boards including, but not limited to:
 - Minnesota Works
 - Handshake
 - Connect MSP
 - LinkedIn
 - Ramsey County Job Connect
 - MN Council of Nonprofits
 - LocusMN
 - Latino Lead MN
 - The Communications Network
 - Work for Good
 - Net Impact
 - Mossier
 - Idealist
 - Women in Product
 - Black Tech Jobs
 - Black in Technology
 - People of Color in Tech
 - Diversify Tech
 - Minnesota Governmental Relations Council (MGRC)
 - Employment Crossing
 - Minnestar.org
- Human Resource staff participate in enterprise recruitment efforts.
- The agency will continue to place advertisements of job opportunities through [the State of MN Career site](https://mn.gov/mmb/careers/search-for-jobs/) (<https://mn.gov/mmb/careers/search-for-jobs/>).

- Continue to utilize the second look practice as a good faith effort that managers are not overlooking qualified candidates due to biases.
- The agency will develop an intentional diversity recruitment strategy to increase the representation of racial/ethnic minorities in all job categories, specifically in Service Maintenance where there is an underutilization, Officials and Administrators where diversifying leadership positions have several benefits, and professionals where most of our workforce is categorized. In addition to new efforts, the agency will also continue with current and promising practices adopted in the past two years:
 - HR incorporates DEED core values and behaviors into job posting qualifications, including language to attract individuals who have experience working with diverse communities.
 - Hiring Managers will determine which positions require multi-lingual skills and post these skills as minimum/preferred qualifications for jobs as applicable.
 - Continue to develop new relationships with various community partners to best engage with current and future DEED employees of diverse backgrounds.
 - Continue to use best practices to ensure job postings are inclusive to attract diverse candidates.
 - Use LinkedIn job posting feature to search for qualified applicants on an ongoing basis, specifically featuring hard to fill and high-volume positions in the categories where the agency is underutilized.
 - Advertise the Connect 700 program to attract qualified individuals with disabilities by providing a link to MMB's web site.
 - Continue to use the EEO tag line on all job postings and advertisements.
 - Communications continues to publish recruitment related media depicting individuals that represent protected groups.
 - Review/evaluate job postings on an ongoing basis to eliminate non-inclusive language.
 - Develop a pipeline for jobs across job categories by using state-wide internship opportunities like Right Track, Step Up, Urban Scholar and Star of the North Fellows. Additionally, utilize pipelines that connect to DEED's public facing employment and training programs to hire for DEED roles.
- Participate in the following additional job fairs to recruit females, persons with disabilities and racial or ethnic minorities.
 - People of Color Career Fair
 - Disability:IN Minnesota INclusive Career Fair
 - OneMinnesota-MLK Career Fair
 - Diversity Networking and Job Fair at Metro State University

Name of individual(s) responsible

- | | |
|--|---|
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| • Title: Human Resources Supervisor 4 | • Phone: 651-259-7103 |

Retention

The agency will take the following actions to improve retention of females, persons with disabilities and racial or ethnic minorities:

The agency has developed a strong foundation for diversity, equity, inclusion, and access (DEIA) at DEED. The agency will build on these existing efforts and programming to improve the retention of a workforce that represents the rich diversity of Minnesotans.

- Rooting our culture and belonging efforts in DEED’s values.
- Utilize and continually improve DEED’s new employee on-boarding program, including Living DEED’s Values where we establish shared language around DEIA principles.
- Utilize the Equity Change Framework for decision making and policy creation and renewal.
- Division leaders establish and pursue Equity Objectives and Key Results focused on disparity reduction, where all employees play a role in making transformational change in Minnesota’s economy.
- Collaborate with DEED’s Diversity, Equity, Inclusion and Accessibility Committee, Employee Engagement Committee, and Accessibility Champions to provide insight on workplace culture, provide the senior management team with recommendations for improvement and develop work plans that cultivate a culture of belonging.
- Regularly advertise statewide employee resource group opportunities for staff to join.
- Continue to transparently communicate work out of class opportunities via Talent Share to all employees.
- Continue to make diversity, equity, inclusion and access training available to all DEED employees.
- Hold Community Reflections and Critical Conversations to sustain a supportive and learning-focused community of employees.
- Continue weekly shout-outs to staff in Commissioner’s Friday messages and value share outs at monthly town hall meetings for all staff.
- Evaluate employee engagement survey results and disaggregate protected class data to identify opportunities to target and/or strengthen programming in collaboration with division managers.
- Collect exit interview information, analyze the data and address identified concerns.
- Monitor separation data and exit survey data on a quarterly basis and share as needed with the Senior Leadership Team.
- Continually evaluate the hiring, promotional and discipline practices in the agency to address barriers.
- Partner meetings with division director to share key information about their respective divisions, including:
 - Workforce Demographics broken down by EEO4 job category,

- Separation data of females, racial or ethnic minorities and persons with disabilities in each EEO4 job category; and
- Qualitative data from exit surveys, etc.
- Champion Employee Resource Groups at DEED by supporting existing groups and encouraging the creation of new groups.
- Continue building out the Intercultural Skills Development Program (ISDP) to help people managers lead diverse teams, center equity in decision making and ensure we are providing accessible and culturally responsive services to all. Increasing people leader’s cultural competency is an action aimed at retaining diverse teams and reducing racial and other disparities in Minnesota’s economy.
- Continue to offer programming related to career advancement, which is designed to equip employees with skills to own their professional development and career trajectory. This includes developing an employee web page that will contain information on the hiring, work out of class, and reallocation processes.
- DEED was unable to develop an Early Conflict Resolution program in the previous plan year but will follow through during this plan year. The program will consist of staff in ODEO and HR offering one-on-one consulting, conversation facilitation and mediation to assist employees in resolving conflicts. It also includes training people leaders on various intercultural conflict styles.

Name of individual(s) responsible

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Title: Human Resources Director	Phone: 651.259.7097

Training

The agency will take the following actions to improve retention of females, persons with disabilities and racial or ethnic minorities.

The agency has developed a strong foundation for learning and development at DEED. The agency will build on existing efforts and programming to improve the retention of a workforce that represents the rich diversity of Minnesotans. Ongoing and new training opportunities include:

- Communicate learning and development opportunities to employees via DEN and electronic communications.
- Continually improve the monthly new employee orientation for employees to learn about agency mission, department objectives, agency values and behaviors, HR policies and the benefits of a diverse and inclusive workplace culture.

- Host monthly manager’s meet ups with various discussion/training topics. Examples may include psychological safety, unconscious biases, microaggressions, performance management, the hiring process, hiring through Connect 700, etc.
- Continue to host Annual Leadership Professional Development Days.
- Continue the Innovation Lab to encourage employees to learn human-centered design and be creative in solving agency problem.
- Continue building out the Intercultural Skills Development Program (ISDP) to provide employees with the opportunity to dig deeper into cultural dimensions and adaptive strategies to bridge cultural differences.
- As an initiative associated with the Early Conflict Resolution program, assessments and training will be provided to employees to learn more about intercultural conflict styles.
- Diversity Spotlight events will continually be offered to employees to learn about diverse lived experiences and celebrate various dimensions of identity.
- Continue to promote leadership development programs, such as the Emerging Leaders Institute and Senior Leadership Institute to all employees.
- LinkedIn Learning licenses and resources are continually offered and updated.
- The DEN (DEED Employee Network) is continually updated with new opportunities for learning.
- Employee Resource Groups will be supported to host learning and development for both ERG members and all staff at DEED.

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Innovative Programs

Minnesota Statute 2023, section 43A.191, subdivision 3, (e).

An agency is encouraged to develop other innovative ways to promote awareness, acceptance and appreciation for diversity and affirmative action. These innovations will be considered when evaluating an agency's compliance with this section.

- To promote transparency and accountability, DEED has developed agency-wide culture and engagement Objective and Key Results (OKRs) to include the establishment of a system of accountability for people leaders to share Employee Engagement survey results and action plans for progress with their teams. People leaders will be provided with tailored consults to help them make progress on culture and engagement goals at a local level.
- DEED will launch three (3) agency-specific Employee Resource Groups by the end of December 2024, with the aim to include more the following year. ERGs have been proven to increase employee engagement, recruitment and retention, especially among protected class employees.
- DEED will continue to refine the Annual Learning Requirements for FY 2025 and 2026, which include training in DEIA topics such as inclusive customer service, intercultural competency, conflict fluency and economic racial disparities.
- DEED will develop a plan to increase awareness of the Respect in the Workplace Policy as well as what respectful and disrespectful behavior looks like, what is expected of employees and how to file a complaint. This will increase respect in the workplace, resulting in improved employee experience, engagement and feelings of inclusion.
- DEED will focus on increasing the cultural competency of HR staff who advise people leaders on performance management/progressive discipline using Intercultural Development Inventory and Intercultural Conflict Styles. With our staff who provide performance management guidance on employee relations matters (HR Consultants) having a greater awareness of their personal level of cultural competency and greater sense of diverse conflict styles, HR consultants can be mindful of cultural differences that may be impacting interpersonal relations between people leaders and staff. This action is expected to decrease discipline, non-certifications and terminations of protected class employees.
- During fiscal years 2025 and 2026, DEED will provide at least 15 opportunities for all staff to join in learning opportunities about diverse lived experiences, outside of DEED's Annual Learning Plan. Programming that counts toward this includes Diversity Spotlights, Critical Conversations and/or Community Reflections. Increased awareness of diverse lived experience and improved customer service that is culturally responsive as well as increased inclusive behavior of DEED staff, thus leading to greater sense of staff belonging.
- During fiscal year 2026, the annual learning plan will include anti-racism training for people leaders and individual contributors as well as bystander v. upstander training for all staff.
- ODEO will make updates to the ADA reasonable accommodation process to ensure greater efficiency and a better user experience. Updates include, but are not limited to, improving agency intranet resources, creating process maps of the current interactive process to identify aspects that can be automated to improve efficiency and transparency, and building automated system to support the interactive process.
- Starting with DEED's Policy Review Committee, ODEO will develop a plan to pilot the requirement of using DEED's Equity Change framework (ECF) and decision-making tool. A strategic policy review

process utilizing the ECF enables DEED to collaboratively incorporate equity assessments to ensure that diversity, equity, inclusion and accessibility are embedded throughout policies and practices, shaping all that we do and how we do it. The eventual goal is to equip leadership with the knowledge and skills to use an equity lens in their decision-making to dismantle structural racism in their divisions/programs.

- DEED will develop a process that ensures diverse perspectives are included in the development of human resources policies, procedures, practices and communication to foster inclusive practices across the agency. As a result, human resources policies and practices will proactively and consistently promote a diverse, equitable, inclusive and accessible workplace that values and uplifts protected class employees.
- DEED will develop system and communications plan to guide divisions in completing self-audits of vital documents. Self-audits will focus on plain language, inclusive and non-gendered language, and language translations.
- To improve culture and staff engagement, especially among protected class employees, DEED's ODEO and HR will provide division and team leaders with tailored reports that highlight team diversity, hiring and separation statistics, high level exit survey data, high scoring indicators from the employee engagement survey, and areas of opportunity.
- DEED will develop a goal setting structure for employee groups that ensures alignment with agency DEIA and/or Culture and Engagement goals. Setting up an easy and clear system for goal setting that is consistent across all employee groups simplifies the process for aligning employee engagement group resources with agency culture and engagement strategic priorities and establishes a system for accountability all the way up to Commissioner's office. It will also allow us to communicate impact of employee engagement groups to DEED leaders and all staff, sustaining buy-in and empowerment.

Disability Recruitment, Hiring, and Advancement

Minnesota Statutes 2023, section 43A.191, subdivision 2 (d), subdivision 2a (b) (1) and (2), (c) (1) to (5).

This section identifies ways the agency will provide assurances, procedures and commitments to provide adequate hiring, placement and advancement opportunities for persons with disabilities. It must describe specific actions to ensure that a broad range of persons with disabilities will be aware of and be encouraged to apply for job vacancies when eligible:

1. The use of programs and resources that identify job applicants with disabilities who are eligible to be appointed under a hiring authority that takes disability into account, consistent with the demonstration program under section 43A.15, subdivision 14.
 - a. Most available positions are eligible for the Connect 700 program. Corresponding job postings indicate how Connect 700 program applicants can receive consideration.
 - b. DEED's Vocational Rehabilitation program creates awareness about Connect 700 employment opportunities.
 - c. Tight alignment between Talent Acquisition team and ODEO's EO Specialist to ensure all parties are aware of Connect 700 program requirements and promising practices.
2. Establishment and maintenance of contacts, that may include formal agreements, with organizations that specialize in aiding persons with disabilities in securing and maintaining employment.
 - a. ASLIS: ASL interpretation
 - b. The STAR program: Accessible technology
 - c. The Minnesota Council on Disability: Physical accessibility audits

- d. Collaboration with internal program partners at DEED such as Vocational Rehabilitation, State Services for the Blind, Disability Determination Systems, Employer Reasonable Accommodation program (ERAF) and RESOLVE.
3. The plan must ensure that the agency has designated sufficient staff to handle any disability-related issues that arise during the application and selection process and shall require the agency to provide staff with sufficient training, support, and other resources to carry out the responsibilities.
 - a. ADA Coordinator is responsible for overseeing all disability-related issues, including ADA accommodations.
 - b. Equal Opportunity Specialist assists the ADA coordinator with disability-related issues, including ADA accommodations, and coordinates the agency's Connect 700 program.
 - c. Diversity, Equity, and Inclusion Coordinator serves as a back-up when the ADA Coordinator and Equal Opportunity Specialist are unavailable.
4. Ensuring that disability-related questions from members of the public regarding the agency's application and selection processes are answered promptly and correctly, including questions about reasonable accommodations needed by job applicants during the application and selection process and questions about how individuals may apply for positions under hiring authorities that take disability into account.
 - a. All job postings contain the language "To receive consideration as a Connect 700 Program applicant, apply online, email the Job ID#, the Working Title and your valid Proof of Eligibility Certificate by the closing date to Talent Acquisition at talent.acquisition.deed@state.mn.us."
 - b. All job postings contain the language "The Department of Employment and Economic Development is an equal opportunity, affirmative action, and veteran-friendly employer, and encourages all qualified candidates to apply for job opportunities. If you are an individual with a disability who needs assistance or cannot access the online job application and search tools, please contact Karen Lilledahl at Karen.Lilledahl@state.mn.us. Please indicate what assistance is needed."
 - c. When candidates are invited to participate in the selection process, the selection process will be described (e.g., interview process, assessment process). All candidates will be provided information regarding the procedure to request reasonable accommodations, if necessary, to allow candidates with disabilities equal opportunity to participate. For example, describing if interview questions will be offered ahead of time and what technology may be used during an assessment. This allows an individual with a disability to determine if they need a reasonable accommodation in advance.
5. If an individual has applied for appointment to a particular position under a hiring authority that takes disability into account, determining whether the individual is eligible for appointment under such authority and if so, forwarding the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed, consistent with all applicable laws; and
 - a. Most jobs posted are eligible for the Connect 700 (C700) program. When a C700 application is received, the candidate's resume is reviewed by Human Resources staff to ensure the candidate meets minimum qualifications.
 - i. If the candidate does not meet the minimum qualifications, the specific qualifications not met are indicated and MMB is notified.
 - b. Once HR has reviewed the candidate's resume, it is forwarded to the hiring manager, along with instructions and resources for adhering to C700 program rules. The ODEO office is also notified and ODEO staff, in turn, connect with the hiring manager to coordinate next steps.

- c. Prior to the non-competitive interview, ODEO staff review the interview questions to ensure alignment with minimum qualifications and respond to any interview accommodation requests.
- d. ODEO staff is present during the non-competitive interview to ensure the interview is being conducted properly and to answer any candidate questions regarding the C700 program or ADA accommodations process.
- e. If the candidate is determined to possess the qualifications needed to fulfill the job requirements, HR completes a routine background check.
 - i. If the candidate is determined not to possess the minimum qualifications, ODEO staff review the determination before, and the candidate is notified and informed of the qualifications lacking. MMB is notified.
- f. Once the candidate starts their 700-hour on-the-job period, ODEO reaches out to the new hire to welcome them and ensure awareness about how they can request an accommodation if needed.
- g. During the 700-hour on-the-job demonstration of skills, the supervisor meets with the C700 employee at least bi-weekly to provide feedback and provide the employee the opportunity to express any needs in terms of training.
- h. When the candidate successfully demonstrates that they have the skills required to do the job, they are offered the position and transferred to probationary status. Supervisors can transfer the candidate to probationary status prior to the end of the 700 hours available.

Supported Employment (Worker) Program

This section identifies ways the agency will identify any positions in the agency that can be used for supported employment as defined in section [268A.01, subdivision 13](#), of persons with significant disabilities. The agency shall report this information to the Commissioner or head of the agency. An agency that hires more than one supported worker in the identified positions must receive recognition for each supported worker toward meeting the agency's affirmative action goals and objectives.

As this program is relaunched across the enterprise, DEED's Human Resource Director and ODEO Director will partner to assist supervisors, managers, affirmative action officers and human resources staff in the creation of supported worker positions. These positions help reduce agency costs by diverting supportive employment duties from higher skilled workers to supported worker positions. This can improve employee morale and retention of individuals with disabilities in integrated employment.

Reasonable Accommodations

This section identifies ways the agency:

1. Provides reasonable accommodations in the hiring and promotion of qualified persons with disabilities.
2. Complies with accessibility standards under 16E.03, Subd. 9
3. Methods and procedures for providing timely access to reasonable accommodations during the application process, throughout current employment, and when seeking promotion.
4. Provisions for funding reasonable accommodations; and
5. The number of requests made, the number of requests approved, and the number of requests reimbursed from the state accommodation account under section [16B.4805](#).

Table 5. Reasonable Accommodation Requests, Approvals, and Reimbursements

Number of Requests	Number of Requests Approved	Number of Requests Reimbursed
FY 24 - 136	113	724
FY 23 - 141	109	571

PPM 431: DEED ADA Reasonable Accommodation Policy

Policy History

Review Date: 01/01/19

Effective Date: 01/01/19

Revision Date: 09/1/24

Version: 1

Description

The Minnesota Department of Employment and Economic Development (DEED) commits to ensuring fair and equal employment of people with disabilities. Reasonable accommodation is the key to this nondiscrimination policy. While many individuals with disabilities can work effectively without accommodation, some qualified employees and applicants encounter barriers to employment without the accommodation process.

Reason for Policy

It is DEED's policy to accommodate qualified individuals with disabilities unless doing so would impose an undue hardship or direct threat. In line with the Minnesota Human Rights Act and the Americans with Disabilities Act (ADA), DEED provides accommodations to qualified individuals with disabilities when the accommodations are essential for performing the essential functions of a job, competing for a job or accessing equal benefits and privileges of employment.

Scope

This policy applies to all applicants, employees, and employees seeking promotional opportunities.

Failure to Comply

Failure to comply with this policy and its procedures may result in disciplinary action.

Definitions

Applicant

A person who expresses interest in employment and meets the minimum requirements for application as outlined by the job posting and job description.

Americans with Disabilities Act (ADA) Coordinator

DEED is required to appoint an ADA coordinator to direct and coordinate agency compliance with the ADA.

Direct Threat

A direct threat is a significant risk of substantial harm to the health or safety of the individual or others that a reasonable accommodation cannot eliminate or reduce. To determine that an individual poses a direct threat, an individualized assessment will be conducted. This assessment will consider the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur and the imminence of the potential harm.

Essential Functions

Essential duties are those so fundamental that an individual cannot perform the job without executing them. A function can be considered essential if the job exists specifically to perform that function(s), if only a limited number of employees can perform the function(s), or if the function(s) are specialized, and the individual was hired for their expertise in that area.

Health Care Professional

A person who is licensed to practice in a healthcare field that involves diagnosing and assessing the disability or disabilities in question. Appropriate professionals include but are not limited to, doctors (including psychiatrists), psychologists, nurses, physical therapists, occupational therapists, speech therapists, vocational rehabilitation specialists and licensed mental health professionals.

Interactive Process

A two-way interactive discussion between the employer and the individual with a disability to identify an effective reasonable accommodation that enables the person with a disability to perform the essential functions of the job. For the process to be interactive, both parties must communicate and exchange information.

Individuals with a Disability

For purposes of this policy, someone 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 an impairment.

Major Life Activity

Basic activities people in the general population can perform with little or no difficulty include, but are not limited to, walking, seeing, hearing, self-care, performing manual tasks, speaking, sleeping, breathing, concentrating, learning and working. Major life activities also include the operation of major bodily functions, such as the immune system, normal cell growth, digestion, bowel function, neurological processes, circulation and reproductive functions.

Medical Documentation

Information from the requestor's treating healthcare provider that allows the employer to determine whether the individual has a disability and what type of reasonable accommodation might be needed, especially when the disability or accommodation need is not obvious. Employees can request medical documentation using the standardized Letter Requesting Documentation for Determining ADA Eligibility from a Medical Provider.

Qualified Individual with a Disability

An individual who meets the necessary skill, experience, education, and other job-related requirements for the position that they hold or seek, and who can perform the essential functions of the position with or without reasonable accommodation.

Reasonable Accommodation

A reasonable accommodation is an adjustment or alteration to a job that allows a qualified individual with a disability to apply for a job, perform job duties or enjoy the benefits and privileges of employment. This may

involve modifications to the job application process, adjustments to enable the individual to perform the essential functions or changes that allow the individual to access equal benefits and privileges of employment.

Reasonable accommodation applies to three aspects of employment: 1) Ensuring equal opportunity in the employment process; 2) Enabling a qualified individual with a disability to perform the essential job functions, and 3) Allowing an employee with a disability to equally enjoy all benefits and privileges of employment.

DEED will consider an individual's preference for reasonable accommodation but may choose an equally effective accommodation that is less costly or easier to obtain.

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

The following examples are NOT accommodations:

- Eliminating essential job functions
- Creating a new job
- Lowering production standards
- Providing personal-use items such as glasses or hearing aids

Reassignment

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

Undue Hardship

Undue hardship refers to a specific reasonable accommodation that would cause significant difficulty or expense. Determining undue hardship is determined on a case-by-case basis. DEED is not required to provide accommodations that would impose an undue hardship on the agency's operations.

Requesting Reasonable Accommodations

To qualify for a reasonable accommodation, an individual must be both qualified for the position and have a disability as defined by the ADA or the Minnesota Human Rights Act. Determining whether an impairment substantially limits a major life activity requires an individualized assessment.

The reasonable accommodation procedure is an interactive process and requires participation by both the individual with a disability, the supervisor and the ADA Coordinator. This process may require periodic reviews to assess the ongoing effectiveness of the accommodations provided.

An employee may request a reasonable accommodation at any time, even if they have not previously disclosed their disability or the need for an accommodation. A request is any communication in which the individual indicates that they need DEED to provide or change something due to a medical condition. The reasonable accommodation process begins as soon as possible after the accommodation request is made.

DEED supervisors and managers have the authority to approve accommodation requests for standard office equipment that is needed as a reasonable accommodation and adaptive items costing less than \$250, or any

standard office equipment that would be purchased for employees regardless of accommodation requests. The ODEO must be notified of the accommodations.

Procedure for Current Employees

1. **Informing about Accommodation Needs** - Employees must notify either their supervisor or the ADA Coordinator that there is a need for an accommodation. They should complete a [Reasonable Accommodation Request Form](#) and submit it to the ADA Coordinator at [mailto:deed.odeo@state.mn.us?subject=ADA Accommodation Question](mailto:deed.odeo@state.mn.us?subject=ADA%20Accommodation%20Question)
2. **Review and Consultation** - The ADA Coordinator in consultation with the employee and supervisor will:
 - a. Discuss the job's purpose and essential functions. A step-by-step job analysis may be needed.
 - b. Identify the specific job-related limitation(s).
 - c. Determine the most suitable accommodation for both the individual and DEED. While DEED will consider the employee's preference, an equally effective accommodation that is less costly or easier to provide may be considered.

Medical Information Responsibility - The employee or applicant must provide the required medical information detailing functional limitations and how the impairment affects job duties or other job-related aspects. If the ADA Coordinator needs additional medical documentation to identify functional limitations, the effect of the impairment on job duties or other job-related limitations the employee must provide additional medical documentation.

Approval and Agreement - If the request is approved, the ADA Coordinator will send the Reasonable Accommodation Acknowledgment form to the supervisor. Both the employee and the supervisor must sign this document and return the signed document to the ADA Coordinator at DEED.ODEO@state.mn.us.

ADA Coordinator's Authority - DEED's ADA Coordinator is the decision maker for reasonable accommodation requests outside of the supervisors' and managers' authority.

Denial and Appeal - If the ADA Coordinator denies the request, the employee will receive a written explanation for the denial. The employee may then follow the appeal process outlined below if they choose.

Reassignment - If an accommodation cannot address the existing barriers or would cause undue hardship, the ADA Coordinator and employee will collaborate with DEED's Human Resources Department to explore reassignment to a vacant position as an appropriate accommodation. Reassignment is considered only when no other accommodation is feasible.

DEED will consider transfer, mobility, appointment, noncompetitive, and competitive opportunities, but is not required to create a new job or to bump another employee from a job to provide a reassignment.

NOTE: A [Reasonable Accommodation Request Form](#) must be completed for all accommodation requests and submitted to the ADA Coordinator at DEED.ODEO@state.mn.us for processing. All medical information about the reasonable accommodation is kept in the confidential medical file maintained by the Office of Diversity and Equal Opportunity (ODEO.)

Procedure for Job Applicants

1. A job applicant must notify the hiring supervisor, the Human Resources staff or the ADA Coordinator if they need an accommodation to participate in any part of the hiring process.
2. The request will be reviewed to determine the need for accommodation. If an accommodation is needed, an effective accommodation will be selected and implemented.

3. The hiring supervisor, the Human Resources staff or the ADA Coordinator will ensure the accommodation is provided in a timely manner. If the accommodation is denied, the applicant will be informed of the decision within five (5) working days,

NOTE: All tangible accommodations purchased by DEED are the property of the State of Minnesota. DEED is responsible for maintaining any equipment provided.

Policy for Funding Accommodations

Funding must be approved by DEED for accommodations that do not cause an undue hardship. Hiring units or their divisions are required to assume the cost of accommodations.

Procedure for Determining Undue Hardship

An interactive process must take place before the agency can determine undue hardship. The determination involves evaluating the reasonable accommodation in relation to the agency's size, resources and the impact on its operations of the agency. Before denying a reasonable accommodation request due to financial constraints, the ADA Coordinator will consult DEED's Commissioner or designee and/or the State ADA Coordinator at MMB.

Confidentiality

Medical Information

The ADA Coordinator will confidentially maintain all medical information or documentation related to the reasonable accommodation process. Physical copies of medical information are stored in a locked cabinet or office in the ODEO. Generally, only the ADA Coordinator or designated ODEO staff should review this medical documentation.

Medical information obtained during the accommodation process may only be disclosed to supervisors, managers, or DEED HR staff who have a business need to know. Disclosures are limited to necessary work restrictions and accommodations. First aid and safety personnel will be informed of any limitations if the employee may require emergency treatment or assistance in an emergency evacuation. Additionally, information may also be shared with government officials such as the State ADA Coordinator or other officials involved in advising or investigating agency ADA compliance.

The fact that an individual is receiving an accommodation due to disability is confidential and should only be shared with individuals who need to know to implement the accommodation, such as the requestor's supervisor and the ADA Coordinator.

If a supervisor receives any medical information related to a reasonable accommodation, they must forward it to the ADA Coordinator at DEED.ODEO@state.mn.us. Supervisors must not retain any medical information and should only keep the Reasonable Accommodation Acknowledgment in their supervisory files.

Appealing Denials

Employees or applicants whose accommodation requests are denied will receive written notice, explaining the reason for the denial. If employees, applicants, and supervisors or managers are dissatisfied with the decision, they may file a written appeal with DEED's Commissioner or their designee within 10 business days of the decision. The DEED Commissioner or their designee will review the appeal and make a final decision within 10 business days of receiving the appeal request.

For further actions, individuals can contact other governmental agencies such as the Minnesota Department of Human Rights or the U.S. Equal Employment Opportunity Commission. For more information on the appeal process and answers to any questions about reasonable accommodation, contact the ADA Coordinator at DEED.ODEO@state.mn.us

ADA Coordinator

[Karen Lilledahl](#) – Lead ADA Coordinator, WIOA Compliance Manager
651-259-7089


Minnesota Department of Employment and Economic Development
180 E 5th St., Suite 1200
St Paul MN 55101
Fax 651-297-5343
Email: DEED.ODEO@state.mn.us

This information is available in alternate formats by calling 651-259-7094.

B. Department of Employment and Economic Development Employee/Applicant Request for Americans with Disabilities Act (“ADA”) Reasonable Accommodation Form

The Employee/Applicant Request for Americans with Disabilities Act (“ADA”) Reasonable Accommodation Form shown below can be found at:

<https://mn365.sharepoint.com/sites/DEED-DEO/Shared%20Documents/request-accommodation.pdf>

 <p>EMPLOYMENT AND ECONOMIC DEVELOPMENT</p> <p>Employee/Applicant Request for Americans with Disabilities Act (“ADA”) Reasonable Accommodation Form</p> <p>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.</p> <p>Employee/Applicant Name: _____</p> <p>Job Title: _____</p> <p>Work Location: _____ Phone Number: _____</p> <p>Data Privacy Statement: This information may be used by your agency human resources representative, ADA Coordinator or designee, your agency legal counsel, or any other individual who is authorized by your agency 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, your agency may refuse to provide a reasonable accommodation.</p> <p>Questions to clarify accommodation requested.</p> <p>What specific accommodation are you requesting? _____</p> <p>If you are not sure what accommodation is needed, do you have any suggestions about what options we can explore? <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>If yes, please explain.</p>	<p>Questions to document the reason for the accommodation request (please attach additional pages if necessary).</p> <p>What, if any, job function are you having difficulty performing?</p> <p>What, if any, employment benefits are you having difficulty accessing?</p> <p>What limitation, as result of your physical or mental impairment, is interfering with your ability to perform your job or access an employment benefit?</p> <p>If you are requesting a specific accommodation, how will that accommodation be effective in allowing you to perform the functions of your job?</p> <p>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 or designee in each agency 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.</p> <div style="border: 1px solid black; padding: 5px;"><p>This form 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.</p></div> <p>Employee Signature: _____ Date: _____</p>
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C. PPM 434 DEED Americans with Disabilities Act (ADA) Title II ADA Policy

Policy History

Review Date: 01/01/20

Effective Date: 01/01/20

Revision Date: 9/1/24

Version:1

Description

The Minnesota Department of Employment and Economic Development (DEED) strives to be a model service provider, valuing diversity, equity, inclusion and access. The programs, services, products and activities of DEED, including programs or services that are funded by DEED, must be accessible to individuals with disabilities. It is unlawful to discriminate against individuals based on disability in services, programs, products or activities.

Reason for Policy

DEED is committed to providing a welcoming environment to individuals with disabilities, ensuring equal access, full participation and non-discrimination based on disability. As part of that commitment, DEED must provide qualified individuals with disabilities an equal opportunity to participate in agency programs, services, products and activities. DEED must take appropriate steps to ensure qualified individuals with disabilities can take part in and benefit from agency programs, services, products and activities.

In compliance with Title II of the Americans with Disabilities Act of 1990, as amended (ADA), and the Minnesota Human Rights Act, DEED will not discriminate against qualified individuals with disabilities in its services, programs, products or activities.

Applicability

This policy applies to all DEED employees, and third parties engaged in business with DEED. Additionally, DEED partners receiving federal or state financial assistance must fulfill their accessibility obligations under Section 504 of the Rehabilitation Act, the implementing regulations at 29 CFR part 32, and the Minnesota Human Rights regulations. Some DEED recipients may also face additional accessibility requirements under other statutory authorities, including Title III of the ADA. For DEED employees who require reasonable accommodation, please reference PPM Chapter 431.

Failure to Comply

Failure to comply with this policy and its procedures may result in disciplinary action.

Employment

DEED does not discriminate based on disability in its hiring or employment practices and complies with all regulations of the U.S. Equal Employment Opportunity Commission under Title I of the ADA, Section 188 of WIOA, and the Minnesota Human Rights Department. See [PPM 435 - Harassment and Discrimination Prohibited](#) and/or [Chapter 5.1: Serving Individuals with Disabilities](#) under the WIOA Equal Opportunity Policy Manual.

Scope

This policy applies to all DEED staff and DEED recipients or sub-recipients, including those receiving:

1. Workforce Innovation and Opportunity Act (WIOA) funding, including Title I - Workforce Development Activities; Title II – Adult Education and Literacy Act; Title III – Employment Services; Title IV – Vocational Rehabilitation State Grant Programs,
2. Workforce development direct appropriations
3. Workforce development local and regional board
4. All organizations partnering with the CareerForce system
5. Business and Community Development
6. Unemployment Insurance

Definitions

Alternative Formats

Alternative formats may include but are not limited to, large text, audio descriptions, CART transcripts, closed captioning, Braille or other accessible formats.

Auxiliary Aids and Services

Effective communication devices that assist individuals with disabilities in accessing DEED's programs and services include, but are not limited to qualified interpreters, note takers, computer-aided transcription services, written materials, telephone handset amplifiers, assistive listening devices and systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, relay services, videotext displays, qualified readers, taped texts, audio recordings, Braille materials or displays, screen reader software, magnification software, and the acquisition or modification of equipment or devices, etc.

Direct Threat

A significant risk to the health or safety of others that cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services.

Effective Communication

Steps taken to ensure all communications with applicants for services, participants, members of the public with disabilities and their companions with disabilities are as effective as communication with those without disabilities.

Individuals with a Disability

1. A person with a physical or mental impairment that substantially limits one or more of the person's major life activities; or
2. A person with a history of a physical or mental impairment that substantially limits one or more major life activities; or
3. A person who is regarded as having such an impairment.

Physical Accessibility

Facilities that are accessible to and usable by individuals with disabilities under the ADA Title II, Section 188 of WIOA, and Minnesota Human Rights laws.

Programmatic Accessibility

Qualified individuals with disabilities are supported by providing reasonable accommodations for qualified individuals with disabilities and modifying policies, practices and procedures as needed. Programs are administered in the most integrated settings appropriate, and communication with persons with disabilities is as effective as with others. Appropriate auxiliary aids or services are provided to ensure qualified individuals with disabilities have an equal opportunity to participate in and enjoy the benefits of the programs and activities.

Qualified Individual with a Disability

A qualified individual with a disability is someone who meets the essential eligibility requirements for receiving services or participating in programs or activities provided by a public entity.

Reasonable modifications in policies, practices, or procedures

DEED must make all reasonable modifications to policies and programs to ensure that qualified individuals with disabilities have an equal opportunity to use its programs, services, products and activities. However, DEED may not be required to make modifications if it can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity, or result in undue financial and administrative hardship.

Recipients

A recipient is an entity to which financial assistance under Title I of WIOA is extended, directly from the U.S. Department of Labor or through the Governor or another recipient. In instances in which a Governor operates a program or activity either directly or through a state agency, using discretionary funds appropriated to the Governor, the Governor is also a recipient. One-stop partners as defined in section 121(b) of WIOA, are treated as recipients and are subject to the nondiscrimination and equal opportunity requirements of Title I of WIOA. Recipients also include, but are not limited to:

1. State-level agencies that administer, or are financed in whole or in part with WIOA Title I funds
2. State Workforce Agencies
3. State and Local Workforce Development Boards
4. LWDA grant recipients
5. One-stop operators
6. Service providers, including eligible training providers
7. On-the-job Training (OJT) employers
8. Job Corps contractors and center operators
9. Job Corps national training contractors
10. Outreach and admissions agencies, including Job Corps contractors that perform these functions
11. Placement agencies, including Job Corps contractors that perform these functions; and

12. Other National Program recipients.

Service Animal

A dog or miniature horse trained to perform work or tasks for a person with a disability qualifies as a service animal. Other species of animals are not service animals for this definition. The work or tasks performed by a service animal must be directly related to the handler's disability.

Requests for Reasonable Accommodation or Modifications

DEED will make all reasonable accommodations and modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all its programs, services and activities provided that the accommodation or modification does not fundamentally alter the nature of its programs or services or impose an undue financial or administrative hardship.

Any qualified individual with a disability, or a third party such as a family member, friend, union representative, healthcare professional or other representative, may request reasonable accommodations or modifications on behalf of a qualified individual with a disability.

There is a [reasonable request for accommodation or modification form](#) that can be used but is not required.

Mobility Devices

DEED permits individuals with mobility disabilities to use wheelchairs and manually powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities, in any areas open to pedestrian use.

DEED will make reasonable modifications to its policies, practices, or procedures to permit the use of other power-driven mobility devices by individuals with mobility disabilities unless the agency can demonstrate that the device cannot be operated safely according to legitimate safety requirements based on actual risks. When deciding whether to permit a power-driven mobility device in a specific facility DEED will consider

1. The type, size, weight, dimensions and speed of the device.
2. The volume of pedestrian traffic in the facility
3. The facility's design and operational characteristics
4. Whether legitimate safety requirements can be met to ensure the safe operation of the device in the facility.
5. Whether the use of the device creates a substantial risk of serious harm to the environment, natural or cultural resources, or conflicts with federal land management laws and regulations.

An agency may ask a person using a mobility device other than a wheelchair to provide a credible assurance the mobility device is required because of the person's disability.

Service Animals

DEED will modify policies, practices or procedures to allow the use of a service animal by an individual with a disability unless DEED can demonstrate that allowing a service animal would fundamentally alter the nature of

the service, program, or activity. A service animal must remain under the control of its handler using a harness, leash, tether, voice control or other effective means.

DEED may ask an individual with a disability to remove a service animal if: (1) the animal is out of control and the animal's handler does not take effective action to control it, or (2) the animal is not housebroken. If DEED excludes a service animal for these reasons, it will provide the individual with a disability the opportunity to participate in the service, program, or activity without the service animal present.

If it is not readily apparent, DEED may ask two questions: 1) if an animal is required because of a disability and 2) what work or task an animal has been trained to perform. These are the only questions allowed under the ADA, and no additional information about a disability may be requested.

Individuals with disabilities must be permitted to bring their service animal in all areas of a DEED facility where the public, participants in services, programs or activities, or invitees can go.

Charging an individual with a disability for being accompanied by a service animal is illegal. However, if DEED or its recipients normally charge individuals for the damage they cause, DEED may charge an individual with a disability for damage caused by the individual's service animal.

Other Accessibility Requirements Under Title II

Programmatic Accessibility

DEED must comply with federal and state legal requirements to ensure that the services, programs, and activities it provides are accessible to individuals with disabilities. This includes offering effective communication, auxiliary aids and services, and reasonable accommodations or modifications to policies and practices so that individuals with disabilities can equally participate in and enjoy the benefits of the program or activity.

Effective Communication

DEED must take appropriate steps to ensure all communications with applicants for services, participants, members of the public with disabilities and their companions with disabilities are as effective as communications with those without disabilities. DEED ensures effective communication by:

1. Providing auxiliary aids and services,
2. Providing notices of rights to alternative formats of documents and accommodations.
3. Meeting accessibility standards in electronic and web-based communications, including captioning all multimedia resources available to the public; and
4. Complying with the [Minnesota State Accessibility Standards](#) and associated processes.

Auxiliary Aids and Services

DEED must generally provide appropriate auxiliary aids and services of request to ensure effective communication for qualified individuals with disabilities, allowing them to enjoy the benefits of and have an equal opportunity to participate in the agency's programs, services, products and activities.

The type of auxiliary aids and services needed will vary based on the individual's method of communication, the nature, length and complexity of the communication, and the context in which it occurs. To determine the appropriate types of auxiliary aids and services, DEED must give primary consideration to the requests of individuals with disabilities.

To be effective, auxiliary aids and services must be provided in accessible formats, in a timely manner, and in such a way that protects the privacy and independence of the individual with a disability. DEED may not charge individuals or groups of individuals with disabilities for the cost required to ensure effective communication.

Notice to the Public

Poster

DEED must post the ADA Notice to the Public about their rights under the ADA in a reasonable number of conspicuous places.

Required Taglines

For communications about upcoming meetings or events, whether electronic or printed, the following tagline should be used:

"Individuals with a disability who need a reasonable accommodation to participate in this event please contact (name of person with responsibility for accessibility, phone number, and email address) by (date) or call using your preferred Telecommunications Relay Provider."

DEED should provide this information within a reasonable time before the anticipated date of the meeting.

All printed communications (including brochures, flyers, etc.) must contain an alternative language format tagline:

"Upon request, the information in this document can be made available in alternative formats for people with disabilities by contacting (email and/or phone number)."

Physical Accessibility

DEED must comply with federal and state legal requirements regarding the provision of facilities that are accessible to and useable by individuals with disabilities. DEED is subject to Title II and must follow the ADA Standards for Accessible Design or the Uniform Federal Accessibility Standards.

Evacuation Procedures for Individuals with Disabilities

DEED work locations may have multiple evacuation options, including horizontal evacuation, stairway evacuation, elevator evacuation, shelter-in-place and areas of rescue assistance. The Americans with Disabilities Act Coordinator or designee at each DEED location will develop a plan and consult with building and safety personnel to ensure the DEED has evacuation procedures in place for people with disabilities.

Limitations

Safety Requirements

DEED may impose legitimate safety requirements necessary for the safe operation of its services, programs, products or activities. However, such safety requirements must be based on actual risks, not on mere speculation, stereotypes or generalizations about individuals with disabilities.

Personal Devices and Services

DEED is not required to provide personal devices, such as wheelchairs; individually prescribed devices, such as prescription eyeglasses or hearing aids; readers for personal use or study; or services of a personal nature including assistance in eating, toileting, or dressing.

Undue Hardship - Reasonable Accommodations or Modifications

The ADA law does not require modifications or actions that would fundamentally alter the nature of DEED's programs or services or impose an undue financial and administrative burden. DEED has the burden of showing that a proposed modification or requested auxiliary aids or services would fundamentally alter the nature of the program, activity or service, or impose an undue burden.

Any decision that providing a proposed modification or requested auxiliary aid or service would result in such fundamental alterations or undue burdens must be made by the DEED's Commissioner after considering all resources available for use in the funding and operation of the service, program, or activity. In addition, a decision to deny the proposed modification or requested auxiliary aid or service must be accompanied by a written statement of the reasons for the decision to the individual or individuals who requested the accommodation or modification.

Direct Threat

DEED does not have to permit an individual to participate in or benefit from its services, programs, products or activities if that individual poses a direct threat to the health or safety of others.

A direct threat refers to a significant risk of substantial harm to the health or safety of others that cannot be eliminated or reduced by auxiliary aids and services, reasonable accommodations, or reasonable modifications to policies, practices and/or procedures. To determine whether an individual poses a direct threat DEED must conduct an individualized assessment based on current medical knowledge or the best available objective evidence. This assessment must include:

1. The essential eligibility requirements of the program or activity
2. The duration of the risk
3. The nature and severity of the potential harm
4. The likelihood that the potential harm will occur
5. The imminence of the potential harm; and
6. Whether reasonable modifications of policies, practices, or procedures or the provision of auxiliary aids or services can mitigate the risk.

DEED bears the burden of showing a direct threat exists.

Retaliation

DEED and its recipients do not tolerate retaliation against anyone who:

1. Requests an accommodation, modification, or auxiliary aids or services for themselves or a third party.
2. Reports a violation of this policy.
3. Files a charge or complaint in connection with this policy or Title II of the ADA.
4. Participates in a related investigation or proceeding.

Retaliation is strictly prohibited. DEED will discipline any employee found to have retaliated in violation of this policy, up to and including discharge. Third parties found to have engaged in retaliation will face appropriate actions.

Grievance Procedure

Resources

- [Americans with Disabilities Act of 1990 Public Law 101-336](#)
- [Americans with Disabilities Act of 1990, as Amended](#)
- [Nondiscrimination on the Basis of Disability in State and Local Government Revised ADA Regulations 28 C.F.R. Part 35](#)
- [Rehabilitation Act of 1973, Title 29 USC 701](#)
- [Rehabilitation Act of 1973, Section 504](#)
- [Rehabilitation Act of 1973, Section 503](#)
- [MN Statutes Chapter 363A, Minnesota Human Rights Act](#)
- [M.S. 16E.03, Subd. 9, IT Accessibility Standards](#)
- [M.S. 15.44, Aids for Persons with Disabilities at State Meetings](#)
- [M.S. 16C.145, Nonvisual Technology Access Standards](#)
- [M.S. Chapter 237.50-56 Definitions Telecommunications](#)
- [M.S. 256C.02, Public Accommodations](#)

Contact

For additional information contact DEED's Office of Diversity and Equal Opportunity at karen.lilledahl@state.mn.us, 651-259-7089.

Minnesota Department of Employment and Economic Development
180 E 5th St Suite 1200
St Paul MN 55101
651-259-7094
Fax 651-297-5343
DEED.ODEO@state.mn.us

This information is available in alternate formats by calling 651-259-7094.

D. Americans with Disabilities Act (“ADA”) Title II (non-employee) Reasonable Accommodation/Modification in Public Services, Programs or Activities Request Form

A fillable form is available at <https://mn365.sharepoint.com/sites/DEED-DEO/Shared%20Documents/ada-request-accommodation.pdf>

<p>mn MINNESOTA</p> <p style="text-align: center;">_____ (Agency) Americans with Disabilities Act (“ADA”) Title II (non-employee) Reasonable Accommodation/Modification in Public Services, Programs or Activities Request Form</p> <p>The _____ (Agency) is committed to complying with the Americans with Disabilities Act (“ADA”) and the Minnesota Human Rights Act (“MHRA”). The ADA Coordinator/Designee will review each request on an individualized, case-by-case, basis to determine whether an accommodation or modification can be made. Please do NOT send copies of medical records. The Agency is not authorized to have medical records and is not qualified to interpret medical records.</p> <p>General Information Date of Request: _____</p> <p>Person needing accommodation/modification Name: _____ Address: _____ Email: _____ Phone: _____</p> <p>Person making request (if different from person needing accommodation/modification) Name: _____ Email: _____ Phone: _____ Relationship to person needing accommodation/modification: _____</p> <p>Accommodation Information Date accommodation/modification is needed: _____ Address and/or room of accommodation/modification: _____ Type of accommodation/modification requested (please be specific): _____</p> <p>How would you like to be notified of the status of your request? <input type="radio"/> Phone <input type="radio"/> Email <input type="radio"/> Writing <input type="radio"/> Other (specify): _____</p> <p>If someone else has completed this form on your behalf and you want that person to be notified of the status of your request, please initial here: _____</p> <p style="font-size: small;">Updated 08/21/2019</p>	<p>All requests for accommodation/modification will be evaluated individually and a response to your request will be provided within one week of receipt.</p> <p><input type="checkbox"/> Check this box to sign this request form electronically: By checking this box, I agree my electronic signature is the legal equivalent of my signature.</p> <p>Signature of Requestor _____ Date _____</p> <p style="text-align: center;">OFFICE USE ONLY RESPONSE TO REQUEST FOR ACCOMMODATION/MODIFICATION</p> <p>Date request received: _____</p> <p>The request for accommodation/modification is GRANTED. Below is a description of the accommodation/modification:</p> <p>The request for accommodation/modification is DENIED because:</p> <p><input type="checkbox"/> The requester does not meet the essential eligibility requirements or qualifications for the program, service, or activity, without regard to disability. <input type="checkbox"/> The requested accommodation/modification would impose an undue burden on the agency; and/or <input type="checkbox"/> The requested accommodation/modification would fundamentally alter the nature of the service, program, or activity.</p> <p>Requester notified on: (date) _____ via: _____</p> <p>Additional notes:</p> <p>ADA Coordinator: Name _____ Signature _____ Date _____</p> <p style="font-size: small;">Updated 08/21/2019</p>
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E. Department of Employment and Economic Development Grievance Procedure Under Title II of the Americans with Disabilities Act

This Grievance Procedure is established to comply with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA). It may be available to anyone wishing to file a complaint alleging disability-based discrimination in the provision of services, activities, programs or benefits by DEED, including workforce development programs.

For employment-related disability discrimination complaints refer to [PPM 431 Reasonable Accommodation](#), which governs employment-related complaints of disability discrimination. The WIOA complaint process is also available; see [Chapter 7.1 Discrimination Complaint Procedure](#) in the WIOA Equal Opportunity Compliance Manual

Submission of Complaints

The complaint should be in writing and must include:

- The name, address and phone number of the complainant.
- The location, date and description of the alleged discrimination.

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

Deadline: Submit the complaint as soon as possible, but no later than 60 calendar days after the alleged violation. Contact Information: Send complaints regarding accessibility issues to:

Karen Lilledahl, Office of Diversity and Equal Opportunity (ODEO)
Minnesota Department of Employment and Economic Development
180 E 5th St., Suite 1200, St. Paul, MN 55101, phone 651-259-7089, fax 651-297-5343, email DEED.ODEO@state.mn.us

Initial Review: Within 15 calendar days after receiving the complaint, DEED's ADA Coordinator or their designee will meet with or communicate with the complainant to discuss the complaint and possible resolutions.

Within 15 calendar days after this meeting or communication, DEED's ADA Coordinator or their designee will provide a written response. This response will include the agency's position and, where appropriate, will be in a format accessible to the complainant.

Further Appeal: If the complainant is not satisfied with the response, they may appeal within 15 calendar days after receipt of the appeal to the Director of the Office of Diversity and Equal Opportunity (ODEO) at:

Director, Office of Diversity and Equal Opportunity
180 E 5th St., Suite 1200
St. Paul, MN 55101
651-259-7094
Minnesota Department of Employment and Economic Development (DEED)

The Director or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Director or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint. All written complaints, appeals and responses will be retained by DEED for at least three years.

F. Evacuation Procedure for Persons with Disabilities or Otherwise in Need of Assistance

A copy of the agency's weather and emergency evacuation plans can be found on DEED's employee intranet (DEN) at: <https://mn365.sharepoint.com/sites/DEED-DEN/SitePages/PPM-208-Emergencies.aspx>

Employees are strongly urged to review the emergency evacuation procedures at their location to become oriented with the emergency exiting plan. Any employees requiring special assistance in the event of an evacuation from their building should contact Brenda Tuma, Safety Administrator, in the Human Resources Office at 651-259-7104 or Karen Lilledahl, ADA Coordinator, in the Office of Diversity and Equal Opportunity at 651-259-7089.

From [DEED Policy 208 – Emergencies](#)

Supervisors

- Know and follow all emergency procedures. Ensure that all employees are familiar with where to access the DEED Policy 208 – Emergencies and are familiar with and follow the emergency procedures specific to their work location. Inform new employees of emergency procedures, and where to access them.
- Develop evacuation plans with staff that have disabilities and need/want assistance. The Office of Diversity and Equal Opportunity and the DEED Safety Administrator will provide assistance in developing plans according to individual needs and preferences of available options. Some options include the use of a buddy system and/or reporting to a designated "area of rescue" to wait for fire department or other emergency personnel. The only information an individual must provide is the type of assistance needed; it is not necessary to indicate the nature of the disability.
- Notify DEED's Safety Administrator of any employee requiring special assistance in emergency situations. With the Safety Administrator's assistance, ensure that required emergency procedures are implemented for these situations.
- Ensure that all employees are notified of a decision to dismiss after a building evacuation.
- Remind employees to keep their emergency contact information provided through Employee Self-Service up to date. Contact the Human Resources Office at 651-259-7125, if an employee emergency arises that requires emergency contact notification.
- Ensure that annual evacuation and severe weather drills are practiced at your location. DEED Safety Administrator sends an email reminder, which includes guidance for conducting drills annually each year prior to Fire Prevention Month (October). Contact DEED Safety Administrator for questions or assistance with conducting a drill.
- Follow-up on reports of hazardous conditions.

Supervisors are to review the evacuation procedures with staff in order that they understand the evacuation plan and procedures. Supervisors are also required to inform staff how to request additional assistance or an accommodation if needed. Brenda Tuma, DEED's Safety Administrator, is currently the agency's contact person if an employee needs additional assistance. Ms. Tuma works one-on-one with the staff member.

Great Northern Building

Individuals with Mobility Disabilities:

Area of Rescue Assistance: In the Great Northern Building, rescue areas have been established so that individuals with mobility disabilities can safely exit the building with assistance from fire personnel. Each rescue area is equipped with a dedicated emergency radio. Specific emergency instructions for all other DEED offices can be found in each of those offices and should be posted in a conspicuous place.

Individuals with mobility disabilities, who are able to walk independently, may be able to negotiate stairs in an emergency with assistance. Evacuees should pass the individual with the mobility disability on the opposite side of the stairwell. 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.

Individuals with Hearing Disabilities:

The agency's buildings are equipped with fire alarm horns/strobes that sound the alarm and flash strobe lights.

Individuals with Visual Disabilities:

The agency's 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 likely be familiar with their immediate surroundings and frequently traveled routes, but since the emergency evacuation route may be different from the common traveled route, individuals with visual disabilities may need assistance in evacuating. The safety monitors assigned to each floor will ensure that individuals with visual disabilities are helped, appoint an employee to guide the individual with a visual disability through the evacuation route.

Note: The Unemployment Insurance Division, which is located on the eleventh floor has trained floor monitors who sweep (walk-through) their area to ensure no one is left behind. If the area becomes too unsafe for floor monitors to complete their sweep, they are trained to immediately notify an evacuation team member who is equipped with a two-way radio and will communicate the information to the floor wardens, so that emergency personnel can be immediately notified. Staff for all other floors, which do not have trained floor monitors due to lack of consistent onsite staff presence, receive training from their supervisors on how to evacuate during an emergency. Supervisors receive tools from the DEED, Safety Administrator to provide training on an annual basis and to all new employees upon hire.

Name of individual(s) responsible

- Name: Brenda Tuma
- Title: Safety Administrator
- Email: Brenda.Tuna@state.mn.us
- Phone: 651.259.7089

Evacuation Options:

Persons with disabilities have four, possibly five, basic 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.
- **For agencies equipped with an evacuation chair:** Evacuation chairs or a light-weight solution to descending stairways can be used and generally require single user operation. If an agency is equipped with an evacuation chair, best practice indicates that all employees are trained and have practiced evacuating using an evacuation chair.

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

Persons with disabilities should follow the following procedures:

Individuals with disabilities should follow the following procedures:

- **Mobility disabilities (individuals who use wheelchairs or other personal mobility devices (“PMDs”)):** Individuals using wheelchairs should be accompanied to an area of rescue assistance by an employee or shelter in place when the alarm sounds. The safety and security staff will respond to each of the areas of rescue assistance every time a building evacuation is initiated to identify the individuals in these areas and notify to emergency responders how many individuals need assistance to safely evacuate.
- **Mobility disabilities (individuals who do not use wheelchairs):** 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.
- **Hearing disabilities:** The agency's buildings are equipped with fire alarm horns/strobes that sound the alarm and flash strobe lights. The strobe lights are for individuals with 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.

- **Visual disabilities:** The agency's 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 assistant should offer help, and if accepted, guide the individual with a visual disability through the evacuation route.

Severe Weather Evacuation Options:

Individuals in need of assistance during an evacuation have three evacuation 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.
- **Elevator evacuation:** 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:** Seeking shelter in a designated severe weather shelter and remaining there until the all-clear is used.

Methods of Auditing, Evaluating, and Reporting Program Success

Minnesota Administrative Rules 3905.0400, subpart 1, item I.

Pre-Employment Review Procedure/Monitoring the Hiring Process

The agency monitors its selection process to ensure its requirements do not necessarily screen out a disproportionate number of females, racial or ethnic minorities, or persons with disabilities. The agency has modified the hiring process to include evidence-based hiring practices to mitigate bias wherever possible. The agency will use the Monitoring the Hiring Process (MHP) to track the number of females, racial or ethnic minorities, or persons with disabilities for hires in job categories where underutilizations exist. The key points of analysis identified in previously used pre-hire justification forms were integrated into the hiring process from 2021-2022 to administer a more proactive and inclusive hiring process. The inclusive hiring process is detailed below.

Directors, managers and supervisors will work closely with human resources in reviewing position requirements, posting, and the screening and interviewing processes to ensure that equal opportunity and affirmative action requirements are adhered to. The Affirmative Action Officer will continue to review all MHP forms for approval and conduct random audits of Human Resources documentation of hiring decisions to monitor compliance.

An agency that does not meet its hiring goals for competitive appointments, and noncompetitive appointments under MS 43A.08, subd. 1(9), (11) and (16), and 43A.15, subd. 3, 10, 12, and 13, must justify its non-affirmative action hires. The affirmative action statute was amended in 2019 so agencies can no longer take missed opportunities. The agency will report the number of affirmative and non-affirmative hires to MMB on a quarterly basis.

When candidates are invited to participate in the selection process, the selection process will be described (e.g., interview process, assessment process). All candidates will be provided information regarding the procedure to request reasonable accommodations, if necessary, to allow candidates with disabilities equal opportunity to participate. For example, describing if interview questions will be offered ahead of time and what technology may be used during an assessment. This allows an individual with a disability to determine if they need a reasonable accommodation in advance.

Continue conducting a 'second look,' good faith effort to identify candidates to interview. When hiring supervisors and managers are ready to select interview candidates, they will identify the shared qualifications each interviewee demonstrates. HR staff will conduct a 'second look' at applicant materials to ensure other candidates who meet these criteria are also invited to interview and are not left out due to unconscious biases.

The ODEO will partner with HR to continually evaluate DEED's hiring processes to determine if there are areas that could be adjusted to better support agency diversity, equity and inclusion goals, including hiring goals and improved retention. DEED's inclusive hiring process was designed to promote and hold accountable, hiring managers as they fill positions in their divisions. These steps include:

1. Consult with hiring manager on the inclusive recruitment and selection process.
During consultation:
 - i. Inform hiring managers about the *Unconscious Bias in the Search Process* video on the DEN and recommend that they and all interview panel members view it prior to conducting their selection process.
 - ii. Ensure qualifications are job related, non-discriminatory, and inclusive, including substitutions and alternatives to meet the min quals in accordance with guidance from Minnesota Management and Budget (MMB) on assessing and setting qualifications.
2. Inform hiring manager of the requirement to select interview questions from the approved interview question bank located on the DEN and/or seek review of questions from their TA Specialist. These questions have been approved by DEED's Office of Diversity, Equity, and Inclusion.
3. Ensure hiring manager utilizes a resume ranking score spreadsheet based on minimum and preferred qualifications and that it is retained in a selection folder by Job ID#.
4. Review and approve list of applicants selected for interview and retain in folder by Job ID# as noted above
 - a. Compare list of applicants for interview with Affirmative Action Report to ensure diverse representation overall but particularly in goal area(s).
 - b. Perform Second Look; adding equally qualified candidates in protected classes based on equal opportunity commitment, RSVs, statutory requirements, affirmative action goals and agency underutilizations.
5. Ensure hiring manager utilizes an interview ranking score spreadsheet.
6. Ensure hiring manager uses a standard, objective and inclusive rubric with proper, job-related assessment criteria in rating applicants.
7. Ensure additional assessment/exercise scores, if utilized, are standard, objective, inclusive and job related.
8. Collect and review interview responses, interview panel member ranking score spreadsheet, assessment/exercise scores and retain in selection folder.
9. Review finalist(s) and ensure hires are justified based on the most qualified candidate and/or agency underutilized category specified in DEED's Affirmative Action Plan. Non-justified hires are not accepted.
10. Collect employment reference information utilizing objective, job-related criteria within the SkillSurvey automated platform. Retain in selection folder as noted above.
11. Determine finalist, review salary determination per DEED guidelines using MMB approved determination form.
12. Initiate criminal background check per PPM 419- Criminal Background Checks.

Pre-Review Procedure for Layoff Decisions

The Affirmative Action Officer, in conjunction with the agency's human resources office, is responsible for reviewing all pending layoffs to determine whether there is a disparate impact or effect on the agency's affirmative action goals.

If it is determined that there is a disparate impact on protected groups, the agency 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 agency will determine if other alternatives are available to minimize the disparate impact on protected groups.

Other Methods of Program Evaluation

The agency submits the following compliance reports to MMB as part of the efforts to evaluate the agency's affirmative action program:

- Quarterly Monitoring the Hiring Process Reports
- Biannual Affirmative Action Plan
- Annual Americans with Disabilities Act Report
- Annual Internal Complaint Report; and
- Disposition of Internal Complaint (submitted to MMB within 30 days of final disposition)

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

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

Audits, Sanctions, and Incentives

Minnesota Statutes 2023, section 43A.191, subdivision 3, (f) and (g).

An agency not in compliance with affirmative action requirements of this section must identify methods and programs to improve performance, to reallocate resources internally to increase support for affirmative action programs, and to submit program and resource reallocation proposals to the commissioner for approval. An agency must submit these proposals within 120 days of being notified by the commissioner that it is out of compliance with affirmative action requirements. The

commissioner shall monitor quarterly the affirmative action programs of an agency found to be out of compliance.

The commissioner shall establish a program to recognize an agency that has made significant and measurable progress in implementing an affirmative action plan.

Policies and Procedures for Harassment and Discrimination Complaints

Minnesota Administrative Rules, section 3905.0400, subpart 1, item F. Minnesota Administrative Rules, section 3905.0500.

Statewide Harassment and Discrimination Prohibited Policy, HR/LR Policy # 1436 (revised 8/19/2024)

OVERVIEW

Objective

To create a work environment free from harassment and discrimination based on protected class.

Policy Statement

Any form of harassment or discrimination based on protected class is strictly prohibited. Individuals who believe they have been subject to harassment/discrimination based on protected class or retaliation as described in this policy, are encouraged to file a report with an appropriate authority, as set forth in Section II of this policy.

Any form of retaliation directed against an individual who opposes or reports protected class harassment/discrimination, or who participates in any investigation concerning protected class harassment/discrimination, is strictly prohibited and will not be tolerated.

Violations of this policy by State employees will be subject to discipline, up to and including discharge. Violations of this policy by third parties will be subject to appropriate action.

Sexual harassment is specifically addressed by HR/LR Policy #1329 Sexual Harassment Prohibited.

Scope

This policy applies to all employees of, and third parties who have business interactions with, executive branch agencies and the classified employees in the Office of the Legislative Auditor, Minnesota State Retirement System, Public Employee Retirement Association, and Teachers' Retirement Association.

Definitions and Terms

Complainant: An individual who reports protected class harassment, discrimination, or retaliation.

Third party: Individuals who are not State employees, but who have business interactions with State employees, including, but not limited to:

- Applicants for State employment
- Vendors
- Contractors
- Volunteers
- Customers
- Business partners
- Unpaid interns
- Other individuals with whom State employees interact in the course of employees' work for the State, such as advocates, lobbyists, and representatives of individuals or entities with business with any branch of Minnesota state government.

Protected class harassment or harassment based on protected class: Unwelcome conduct or communication that is based on actual or perceived membership in a protected class, including stereotypes of protected classes, that has a negative effect or is likely to have a negative effect on the complainant and/or on the workplace or public service environment.

Protected class: Protected classes under this policy are as follows:

- Race
- Color
- Creed
- Religion
- National origin
- Sex* (includes pregnancy and pregnancy-related conditions)
- Marital status
- Familial status
- Receipt of public assistance
- Membership or activity in a local human rights commission
- Disability
- Age
- Sexual orientation
- Gender identity
- Gender expression
- For employees, genetic information

*See HR/LR Policy #1329 Sexual Harassment Prohibited for specific information on harassment based on unwelcome conduct or communication of a sexual nature.

Age: The prohibition against harassment and discrimination based on age prohibits such conduct based on a person's age if the person is over the age of 18.

Marital status: Whether a person is single, married, remarried, divorced, separated, or a surviving spouse, and includes protection against harassment and discrimination on the basis of the identity, situation, actions, or beliefs of a spouse or former spouse.

Familial status: The condition of one or more minors living with their parent(s) or legal guardian, or the designee of the parent(s) or guardian with the written permission of the parent(s) or guardian. This also protects those who are pregnant or those who are in the process of securing legal custody of a minor from being harassed or discriminated against on that basis.

Disability: A physical, sensory, or mental impairment which materially limits one or more major life activities; a record of such an impairment; or being regarded as having such an impairment.

Genetic information: Includes information about an individual's or their family members' genetic tests, 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 their family member, and the genetic information of a fetus carried by an individual or a pregnant family member, and the genetic information of any embryo legally held by the individual or their family member using an assisted reproductive technology.

Public service environment: A location where public service is being provided.

Membership or activity in a local human rights commission: Participation in an agency of a city, county, or group of counties that has the purpose of dealing with discrimination on the basis of race, color, creed, religion, national origin, sex, age, disability, marital status, status with regard to public assistance, sexual orientation, or familial status, as defined by Minn. Stat. § 363A.03, subd. 23.

Exclusions

N/A

Statutory References

M.S. Ch. 43A
M.S. Ch. 363A

GENERAL STANDARDS AND EXPECTATIONS

Prohibition of Protected Class Harassment and Discrimination

Harassment of or discrimination against any employee or third party based on protected class in the workplace or public service environment, or which affects the workplace or public service environment, is strictly prohibited. Harassment of or discrimination against an individual because of their relationship or association with members of a protected class is also strictly prohibited.

Protected class harassment and discrimination may take different forms including verbal, nonverbal, or physical conduct or communication. Conduct based on protected class may violate this policy even if it is not intended to be harassing. Protected class harassment and discrimination under this policy includes, but is not limited to, the following behavior when it is based on actual or perceived membership in a protected class, including stereotypes of protected classes:

- Offensive jokes, slurs, derogatory remarks, epithets, name-calling, ridicule or mockery, insults or put-downs
- Display or use of offensive objects, drawings, pictures, or gestures
- Physical assaults or threats
- Inappropriate touching of body, clothing, or personal property
- Following, stalking, intimidation
- Malicious interference with work performance
- Implicit or explicit preferential treatment or promises of preferential treatment for submitting to the conduct or communication.
- Implicit or explicit negative treatment or threats of negative treatment for refusing to submit to the conduct or communication.
- Discriminatory conduct based on an individual's actual or perceived protected class that segregates, separates, limits or restricts the individual from employment opportunities, including, but not limited to, hiring, promotion, compensation, disciplinary action, assignment of job duties, benefits or privileges of employment.

I. Employee and Third-Party Responsibilities and Complaint Procedure

Harassment or discrimination based on protected class will not be tolerated. All employees and third parties are expected to comply with this policy.

Employees and third parties are strongly encouraged to report all incidents of protected class harassment or discrimination, whether the individual is the recipient of the behavior, an observer, or is otherwise aware of the behavior. Individuals are encouraged to report incidents as soon as possible after the incident occurs. Individuals may report to any of the following:

1. Any of the agency's managers or supervisors
2. The agency's affirmative action officer
3. The agency's human resources office
4. Agency management, up to and including the agency head.

If the report concerns an agency head, the complainant may contact Minnesota Management and Budget, Enterprise Human Resources, Office of Equal Opportunity, Diversity, and Inclusion.

To ensure the prompt and thorough investigation of a report, the complainant may be asked to provide information in writing, which may include, but is not limited to:

1. The name, department, and position of the person(s) allegedly causing the harassment/discrimination.

2. A description of the incident(s), including the date(s), location(s), and the identity of any witnesses
3. The name(s) of other individuals who may have been subject to similar harassment/discrimination.
4. What, if any, steps have been taken to stop the harassment/discrimination
5. Any other information the complainant believes to be relevant.

Individuals are encouraged to use the agency's internal complaint procedure but may also choose to file a complaint externally with the Equal Employment Opportunity Commission (EEOC), the Minnesota Department of Human Rights (MDHR), or other legal channels.

II. Manager/Supervisory Responsibility

Managers and supervisors must:

1. Model appropriate behavior
2. Treat all reports of protected class harassment/discrimination seriously.
3. Appropriately respond to a report or problem when they receive a report of protected class harassment/discrimination, or when they are otherwise aware a problem exists.
4. Immediately report all allegations or incidents of protected class harassment/discrimination to human resources or the agency Affirmative Action Officer
5. Comply with their agency's complaint and investigation procedures and/or the agency's Affirmative Action Plan

Managers and supervisors who knowingly participate in, allow, or tolerate harassment, discrimination, or retaliation are in violation of this policy and are subject to discipline, up to and including discharge.

III. Human Resources Responsibilities

Agency human resources must:

1. Model appropriate behavior
2. Distribute the Harassment and Discrimination Prohibited Policy to all employees, through a method whereby receipt can be verified.
3. Treat all reports of protected class harassment/discrimination seriously.
4. Comply with the agency's complaint and investigation procedures and/or the agency's Affirmative Action Plan

IV. Affirmative Action Officer or Designees Responsibilities

Agency Affirmative Action Officer/designee must:

1. Model appropriate behavior
2. Treat all reports of protected class harassment/discrimination seriously.

3. Comply with the agency's complaint and investigation procedures and/or the agency's Affirmative Action Plan
4. Keep the agency apprised of changes and developments in the law and policy.

Investigation and Discipline

State agencies will take seriously all reports of protected class harassment, discrimination and retaliation, and will take prompt and appropriate action. When conducting an investigation, managers and supervisors, human resources, and Affirmative Action Officers must follow their agency's investigation procedures.

State agencies will take prompt and appropriate corrective action when there is a violation of this policy.

Employees who are found to have engaged in conduct in violation of this policy will be subject to disciplinary action, up to and including discharge.

Third parties who are found to have engaged in conduct in violation of this policy will be subject to appropriate action. Appropriate action for policy violations by third parties will depend on the facts and circumstances, including the relationship between the third party and the agency. Agencies may contact MMB's Office of Equal Opportunity, Diversity, and Inclusion for assistance in determining appropriate action for third parties. MMB may refer agencies to the appropriate resources, which may include, for example, the Department of Administration with respect to policy violations by vendors or contractors.

Employees who knowingly file a false report of protected class harassment/discrimination or retaliation will be subject to disciplinary action, up to and including discharge.

Non-Retaliation

Retaliation against any person who opposes protected class harassment or discrimination, who reports protected class harassment or discrimination, or who participates in an investigation of such reports, is strictly prohibited. Retaliation also includes conduct or communication designed to prevent a person from opposing or reporting protected class harassment or discrimination or participating in an investigation. Retaliation will not be tolerated. Any employee who is found to have engaged in retaliation in violation of this policy will be subject to discipline, up to and including discharge. Third parties who are found to have engaged in retaliation in violation of this policy will be subject to appropriate action.

RESPONSIBILITIES

Agency Responsibility

Agencies are responsible for the following:

1. Adopting this policy as the agency HR policy.
2. Disseminating this policy to agency employees through a method whereby receipt can be verified.
3. Posting this policy in a manner that can be accessed by all employees and third parties.
4. Including this policy in their Affirmative Action Plan.
5. Implementing this policy, which includes:
 - a. Implementing an educational program
 - b. Developing and implementing a procedure for reporting complaints
 - c. Communicating the complaint procedure to employees
 - d. Developing and implementing a procedure under which reports will be addressed promptly.
6. Enforcing this policy.
7. Reporting annually dispositions of reports of protected class harassment or discrimination using the Affirmative Action Report.

MMB Responsibility

Ensuring that state agencies carry out their responsibilities under this policy, developing training, and updating this policy as necessary.

FORMS AND SUPPLEMENTS

Documents are available on [the MMB Equal Opportunity, Diversity, and Inclusion website](#), including [Affirmative Action resources](#) for state agencies. [Harassment Complaint Form](#)

Acknowledgement – The below form may be used to verify receipt by agency employees.

I acknowledge that I have received and read the policy, HR/LR Policy #1436, Harassment and Discrimination Prohibited, including the policy's complaint procedure.

I understand that harassment and discrimination based on protected class, and retaliation, are strictly prohibited. I understand that if I engage in conduct in violation of the policy toward any State employee, or any "third party" as defined by the policy, I will be subject to disciplinary action, up to and including discharge.

I understand that if I believe that I have been subjected to harassing, discriminatory or retaliatory conduct as defined by the policy by any State employee, or by any "third party" as defined by the policy, I am encouraged to report that behavior. I understand that I can make a report to any of my agency's managers or supervisors, the agency's affirmative action officer, the agency's human resources office, or agency management, up to and including the agency head. I understand that if my report concerns an agency head, I may contact Minnesota Management and Budget.

Signed: _____ Date: _____

Employee Name: _____

REFERENCES

- For issues related to sexual harassment, please refer to HR/LR Policy #1329: Sexual Harassment Prohibited. For issues not related to sexual harassment, or harassment or discrimination based on protected class, please see HR/LR Policy #1432 Respectful Workplace.
- MMB Equal Opportunity, Diversity, and Inclusion Office.
- Consult your agency's Affirmative Action Plan, or in the absence of an Agency Affirmative Action Plan, review [Affirmative Action resources](#) for state agencies.

CONTACTS

MMB Enterprise Employee Relations

[Office of Equal Opportunity, Diversity, and Inclusion](#)

Any appropriate authority, as set forth in Section II of this policy.

Statewide Sexual Harassment Prohibited Policy Statewide HR/LR Policy #1329: Sexual Harassment Prohibited (revised 8/14/2023)

OVERVIEW

Objective

To create a work environment free from sexual harassment of any kind.

Policy Statement

Sexual harassment in any form is strictly prohibited. Individuals who believe they have been subject to sexual harassment as described in this policy are encouraged to file a report with an appropriate authority, as set forth in Section II of this policy.

Any form of retaliation directed against an individual who opposes or reports sexual harassment, or who participates in any investigation concerning sexual harassment, is strictly prohibited and will not be tolerated.

Violations of this policy by State employees will be subject to discipline, up to and including discharge. Violations of this policy by third parties will be subject to appropriate action.

Scope

This policy applies to all employees of, and third parties who have business interactions with, executive branch agencies and the classified employees in the Office of the Legislative Auditor, Minnesota State Retirement System, Public Employee Retirement Association, and Teachers' Retirement Association.

Definitions and Key Terms

Complainant

An individual who complains about sexual harassment or retaliation.

Public service environment

A location that is not the workplace where public service is being provided.

Sexual harassment

Unwelcome sexual advances, unwelcome requests for sexual favors, or other unwelcome verbal, written, or physical conduct or communication of a sexual nature.

Third party

Individuals who are not State employees but who have business interactions with State employees, including, but not limited to:

- Applicants for State employment
- Vendors
- Contractors
- Volunteers
- Customers
- Business Partners
- Unpaid Interns
- Other individuals with whom State employees interact in the course of employees' work for the State, such as advocates, lobbyists, and representatives of individuals or entities with business with any branch of Minnesota state government.

Exclusions

N/A

Statutory References

42 U.S.C. § 2000e, et al.

M.S. Ch. 363A

M.S. Ch. 43A

General Standards and Expectations

I. Prohibition of Sexual Harassment

Sexual harassment of any employee or third party in the workplace or public service environment, or which affects the workplace or public service environment, is strictly prohibited.

Sexual harassment under this policy is any conduct or communication of a sexual nature which is unwelcome. The victim, as well as the harasser, can be of any gender. The victim does not have to be of the opposite sex as the harasser. Sexual harassment includes, but is not limited to:

1. Unwelcome sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, degrading sexual remarks, threats;
2. Unwelcome sexually suggestive objects or pictures, graphic commentaries, suggestive or insulting sounds, leering, whistling, obscene gestures;
3. Unwelcome physical contact, such as rape, sexual assault, molestation, or attempts to commit these assaults; unwelcome touching, pinching, or brushing of or by the body;
4. Preferential treatment or promises of preferential treatment for submitting to sexual conduct, including soliciting or attempting to solicit an individual to submit to sexual activity for compensation or reward;
5. Negative treatment or threats of negative treatment for refusing to submit to sexual conduct;
6. Subjecting, or threatening to subject, an individual to unwelcome sexual attention or conduct.

II. Employee and Third-Party Responsibilities and Complaint Procedure

Sexual harassment will not be tolerated. All employees and third parties are expected to comply with this policy.

Employees and third parties are encouraged to report all incidents of sexual harassment. Individuals are encouraged to report incidents of sexual harassment as soon as possible after the incident occurs. Individuals may make a complaint of sexual harassment to any of the following:

1. Any agency's managers or supervisors
2. The agency's affirmative action officer
3. An agency's human resource office
4. Agency management, up to and including the agency head.

If the report concerns an agency head, the complainant may contact Minnesota Management and Budget's Office of Equal Opportunity, Diversity, and Inclusion.

To ensure the prompt and thorough investigation of a report of sexual harassment, the complainant may be asked to provide information in writing, which may include, but is not limited to:

1. The name, department, and position of the person(s) allegedly causing the harassment.
2. A description of the incident(s), including the date(s), location(s), and identity of any witnesses
3. The name(s) of other individuals who may have been subject to similar harassment.
4. What, if any, steps have been taken to stop the harassment
5. Any other information the complainant believes to be relevant.

Individuals are encouraged to use the agency's internal complaint procedure but may also choose to file a complaint or charge externally with the Equal Employment Opportunity Commission (EEOC) and/or the Minnesota Department of Human Rights (MDHR), or other legal channels.

III. Manager/Supervisor Responsibility

Managers and Supervisors must:

1. Model appropriate behavior
2. Treat all reports of sexual harassment seriously.
3. Appropriately respond to a report or problem when they receive a report of sexual harassment, or when they are otherwise aware a problem exists.
4. Immediately report all allegations or incidents of sexual harassment to human resources or the agency Affirmative Action Officer
5. Comply with their agency's complaint and investigation procedures and/or the agency's Affirmative Action Plan

Managers and supervisors who knowingly participate in, allow, or tolerate sexual harassment or retaliation are in violation of this policy and are subject to discipline, up to and including discharge.

IV. Human Resources Responsibilities

Agency human resources must:

1. Model appropriate behavior.
2. Distribute the sexual harassment policy to all employees, through a method whereby receipt can be verified.
3. Treat all complaints of sexual harassment seriously.
4. Comply with the agency's complaint and investigation procedures and/or their Affirmative Action Plan

-

V. Affirmative Action Officer or Designee Responsibilities

Agency Affirmative Action Officer/designee must:

- Model appropriate behavior.
- Treat all complaints of sexual harassment seriously.
- Comply with the agency's complaint and investigation procedures.
- Keep the agency apprised of changes and developments in the law and policy.

-

VI. Investigation and Discipline

State agencies will take seriously all reports of sexual harassment and retaliation and will take prompt and appropriate action. When conducting an investigation, managers and supervisors, human resources, and Affirmative Action Officers must follow their agency's investigation procedures. State agencies will take prompt and appropriate corrective action when there is a violation of this policy.

Employees who are found to have engaged in conduct in violation of this policy will be subject to disciplinary action, up to and including discharge.

Third parties who are found to have engaged in conduct in violation of this policy will be subject to appropriate action. Appropriate action for policy violations by third parties will depend on the facts and circumstances, including the relationship between the third party and the agency. Agencies may contact MMB's Office of Equal Opportunity, Diversity, and Inclusion for assistance in determining appropriate action for third parties. MMB may refer agencies to the appropriate resources, which may include, for example, the Department of Administration with respect to policy violations by vendors or contractors.

Employees who knowingly file a false report of sexual harassment or retaliation will be subject to disciplinary action, up to and including discharge.

VII. Non-Retaliation

Retaliation against any person who opposes sexual harassment, who reports sexual harassment, or who participates in an investigation of such reports, is strictly prohibited. Retaliation also includes conduct or communication designed to prevent a person from opposing or reporting sexual harassment or participating in an investigation. Retaliation will not be tolerated. Any employee who is

found to have engaged in retaliation in violation of this policy will be subject to discipline, up to and including discharge. Third parties who are found to have engaged in retaliation in violation of this policy will be subject to appropriate action.

RESPONSIBILITIES

Agencies are responsible for:

- Adopting this policy.
- Disseminating this policy to agency employees through a method whereby receipt can be verified.
- Posting this policy in a manner that can be accessed by all employees and third parties.
- Including this policy in their Affirmative Action Plan.
- Implementing this policy, which includes:
 - Implementing an educational program
 - Developing and implementing a procedure for reporting complaints
 - Communicating the complaint procedure to employees
 - Developing and implementing a procedure under which reports will be addressed promptly.
- Enforcing this policy.
- Reporting annually dispositions of reports of sexual harassment using the Affirmative Action Report.

MMB is responsible for:

- Ensuring that state agencies carry out their responsibilities under this policy, developing training, and updating this policy as necessary.

FORMS AND SUPPLEMENTS

For a sample investigation procedure, please review the documents available on the [MMB Equal Opportunity, Diversity, and Inclusion website](#), including:

- Agency AAP Planning Guide
- For agencies with more than 25 employees
- For agencies with 25 or fewer employees

[Harassment Complaint Form](#)

Acknowledgment Form (below) – This form may be used to verify receipt by agency employees.

Acknowledgement

I acknowledge that I have received and read the policy, HR/LR Policy #1329, Sexual Harassment Prohibited, including the policy’s complaint procedure.

I understand that sexual harassment and retaliation are strictly prohibited. I understand that if I engage in conduct in violation of the policy toward any State employee, or any “third party” as defined by the policy, I will be subject to disciplinary action, up to and including discharge.

I understand that if I believe that I have been subjected to sexually harassing or retaliatory conduct as defined by the policy by any State employee, or by any “third party” as defined by the policy, I am encouraged to report that behavior. I understand that I can make a report to any of my agency’s managers or supervisors, the agency’s affirmative action officer, the agency’s human resources office, or agency management, up to and including the agency head. I understand that if my report concerns an agency head, I may contact Minnesota Management and Budget.

Signed: _____ Date: _____

Employee Name: _____

Complaint Procedure for Processing Complaints Under the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy:

The *agency* has established the following complaint procedure to be used by all individuals alleging harassment, discrimination, or retaliation in violation of the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy. Coercion, retaliation, or intimidation against anyone filing a complaint or serving as a witness under this procedure is prohibited.

Who May File:

Any individual who believes that they have been subject to harassment, discrimination, or retaliation in violation of the Harassment and Discrimination Prohibited Policy, or the Sexual Harassment Prohibited Policy is encouraged to use this internal complaint procedure.

If the individual chooses, a complaint can be filed externally with the Minnesota Department of Human Rights (MDHR), the U.S. Equal Employment Opportunity Commission (EEOC), or through other legal channels. The MDHR, EEOC and other legal channels have time limits for filing complaints; individuals may contact the MDHR, EEOC, or a private attorney for more information.

Retaliation against any person who has filed a complaint either internally through this complaint procedure or through an outside enforcement agency or other legal channels is prohibited.

Individuals who knowingly file a false complaint will be subject to disciplinary or corrective action.

The following are the procedures for filing a complaint:

1. The individual may, but is not required to, complete the “Harassment and Discrimination Prohibited/Sexual Harassment Prohibited Policies Complaint Form” provided by the Affirmative Action Officer or designee. Individuals are encouraged to file a complaint within a reasonable period of time after the individual becomes aware that a situation may involve conduct in violation of the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy. The Affirmative Action Officer or designee will, if requested, provide assistance in filling out the form.
2. The Affirmative Action Officer or designee determines if the complainant is alleging conduct in violation of the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy; or if the complaint instead is of a general personnel concern or a general concern of respect in the workplace.
 - If it is determined that the complaint is not related to conduct that would violate the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy, but rather involves general personnel concerns or general concerns of respect in the workplace, the Affirmative Action Officer or designee will inform the complainant, in writing, within ten (10) business days.
 - If it is determined that the complaint is related to conduct that would violate the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy, the Affirmative Action Officer or designee will determine whether corrective action may be taken without an investigation. If it is determined that an investigation is necessary, the Affirmative Action Officer or designee shall investigate the complaint.
3. The Affirmative Action Officer or designee shall create a written investigation report of every investigation conducted. If the investigation shows sufficient evidence to substantiate the complaint, appropriate corrective action will be taken.
4. Within (60) days after the complaint is filed, the Affirmative Action Officer or designee shall provide a written answer to the complainant, unless reasonable cause for delay exists. The complainant will be notified if the written answer is not expected to be issued within the sixty (60) day period. The written answer to the complainant must comply with the data privacy restrictions of the Minnesota Government Data Practices Act.
5. Disposition of the complaint will be filed with the Commissioner of Minnesota Management and Budget within thirty (30) days after the final determination.
6. The status of the complaint may be shared with the complainant(s) and respondent(s). All data related to the complaint are subject to the provisions of the Minnesota Government Data Practices Act.

7. The Affirmative Action Officer or designee shall maintain records of all complaints, investigation reports, and any other data or information the Affirmative Action Officer or designee deems pertinent for seven (7) years after the complaint is closed.

8. In extenuating circumstances, the employee or applicant may contact the State Affirmative Action Officer in the Office of Equal Opportunity at Minnesota Management and Budget for information regarding the filing of a complaint (for example, if the complaint is against the agency head or the agency Affirmative Action Officer).

Department of Employment and Economic Development Harassment and Discrimination Prohibited/Sexual Harassment Prohibited Policies Complaint Form Template

The Harassment and Discrimination Prohibited/Sexual Harassment Prohibited Policies Complaint Form shown below can be found at

[Harassment and Discrimination Prohibited/Sexual Harassment Prohibited Policies Complaint Form Template \(https://mn.gov/mmb-stat/hr-toolbox/003-equal-opportunity-diversity-and-inclusion/reports/sexual-harassment-prohibited-policies-complaint-form-template.pdf\)](https://mn.gov/mmb-stat/hr-toolbox/003-equal-opportunity-diversity-and-inclusion/reports/sexual-harassment-prohibited-policies-complaint-form-template.pdf)

[AGENCY]

**Harassment and Discrimination Prohibited/
Sexual Harassment Prohibited Policies
Complaint Form**

Agency Name _____
 Street Address _____
 City, State Zip Code _____
 Telephone Number _____

Complainant (You)

Complainant's Name _____ Job Title _____
 Agency _____ Telephone _____
 Work Address _____ Division _____
 City, State Zip Code _____ Manager _____

Respondent (Person Against whom you are filing the complaint)

Name _____ Respondent's Job Title _____
 Agency _____ Respondent's Telephone _____
 Work Address _____ Division _____
 City, State Zip Code _____ Manager _____

The Complaint

Basis of Complaint

Place an "X" in the box for all that apply:

<input type="checkbox"/> Race	<input type="checkbox"/> Marital Status	<input type="checkbox"/> Gender Expression
<input type="checkbox"/> Sex	<input type="checkbox"/> Gender Identity	<input type="checkbox"/> Religion
<input type="checkbox"/> Familial Status	<input type="checkbox"/> National Origin	<input type="checkbox"/> Genetic Information
<input type="checkbox"/> Age	<input type="checkbox"/> Creed	<input type="checkbox"/> Retaliation
<input type="checkbox"/> Color	<input type="checkbox"/> Sexual Orientation	<input type="checkbox"/> Membership or Activity in a Local Human Rights Commission
<input type="checkbox"/> Sexual Harassment	<input type="checkbox"/> Reliance on Public Assistance	
<input type="checkbox"/> Disability		

Describe, in as much detail as possible, the conduct that you believe violates the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy. List dates, locations, names and titles of people involved. Explain why you believe the conduct was based on the item(s) checked in the "Basis of Complaint" section above. Use additional paper if needed and attach to this form. Attach any documents you believe may be relevant.

Date most recent act of discrimination/harassment in violation of policy took place: _____

If you filed this complaint with another agency, give the name of that agency: _____

Information on Witnesses Who You Believe Can Support Your Complaint

Witness Name	Witness Work Address	Witness Work Telephone

Additional witnesses may be listed in "Additional Information" or on a separate sheet attached to this form.

This complaint is being filed based on my honest belief that I have been subjected to conduct in violation of the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy. I hereby certify that the information I have provided in this complaint is true, correct, and complete to the best of my knowledge.

Complainant Signature _____ Date signed _____

Complaint Received by: _____ Date signed _____
 (Affirmative Action Officer Signature)

NON-RETALIATION: Retaliation against any person who reports conduct under the Harassment and Discrimination Prohibited Policy or the Sexual Harassment Prohibited Policy is strictly prohibited and will not be tolerated. If you believe that you have been subjected to retaliation, you are encouraged to report such behavior.

This material is available in alternative formats for individuals with disabilities by contacting _____

Additional Information _____

Definitions of Terms Used in This Affirmative Action Plan

Applicant: "Applicant" means a person who has satisfied the minimum requirements for application established by the commissioner of MMB ([M.S. 43A.02, subd. 4](#)).

Availability: an estimated percentage of qualified females, persons with disabilities and racial or ethnic minorities in the relevant labor market who are available for positions in a given job category at a state agency. The final availability is determined by considering two factors: the statistics from the outside labor market and the internal state agency workforce for the Affirmative Action Plan year.

Connect 700 (C700) Program: an alternative selection process for individuals whose disabilities prevent them from demonstrating their skills in a standard competitive selection process. If selected, this program allows eligible individuals to demonstrate their skills in an on-the-job trial work experience of up to 700 hours. See [Minnesota Statutes, section 43A.15, subdivision 14](#).

Feeder job: staffed positions within the agency that can be promoted and/or transferred into other EEO job categories.

Hiring goal: a numerical objective designed to correct an identified deficiency in the utilization of protected group members. For example, the professional job category has identified underutilization, and the availability is 30%, the goal (or hiring goal) for females in the job category is for 30% of the new hires/rehires and promotions for that Affirmative Action Plan year would be females. Goals/hiring goals should never be implemented as quotas, nor should they be used as criteria in decision-making regarding qualifications.

Job category: a group of jobs that are linked by a common purpose and skill set (or sometimes certificates/educational degrees) and are grounded, on the job categories identified by the U.S. Equal Employment Opportunity Commission (EEOC).

Labor market area or reasonable recruitment area: a geographic area in which an agency is seeking a worker in a particular goal unit and where there is an available supply of workers employed or seeking jobs in that goal unit.

Promotion: the appointment of an employee to a position in a class assigned to a salary range which is two or more steps higher at the maximum than the employee's current job class or which requires an increase of two or more steps to pay the employee at the minimum of the new range.

Protected groups: Females, persons with disabilities, and members of the following minorities: Black, Hispanic, Asian or Pacific Islander and American Indian or Alaskan Native ([M.S. 43A.02, subd. 33](#)).

Snapshot: one particular point in time. A snapshot of a workforce is taken at one particular point in time as the basis for Affirmative Action Plan analyses because the workforce numbers are always fluctuating.

Supported Work Program: the state legislature established the program in 1987 to expand employment opportunities for people with significant disabilities. The program has been expanded to include individuals who experience other significant disabilities including, but not limited to head injury, mental illness, and deaf blindness. Under the program, a supported worker must require ongoing support and may share a single position with up to two other supported work employees.

Underutilization: the representation of females, persons with disabilities and racial or ethnic minorities in a specific job category is less than what reasonably would be expected given from workforce participation in the labor market area.

Appendices

Appendix A: Progress Report

Females (Promo = promotion)

Job Category	Prior AAP Total Employee #	Prior AAP Total Females #	Prior AAP Total Females %	Prior AAP Availability Females %	Total Hires & Promo #	Total Hired #	Male Hired #	Females Hired #	Un-known Hired #	Females Hired %	Total Promo #	Male Promo #	Females Promo #	Un-known Promo #	Females Promo %	Actual Females Hiring (%)	Females Had Goals in Prior AAP?	Females Goal Met?
Officials and Managers	89	61	68.54%	59.33%	50	29	<10	20	<10	68.97%	21	<10	13	<10	61.90%	66.00%	-	-
Professionals	1185	812	68.52%	65.04%	559	405	130	253	22	62.47%	154	43	110	<10	71.43%	64.94%	-	-
Technicians	13	<10	**.**%*	43.94%	<10	<10	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	-	-
Paraprofessionals	<10	<10	**.**%*	0.00%	11	11	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	-	-
Administrative Support	140	121	86.43%	70.57%	60	60	<10	47	<10	78.33%	<10	<10	<10	<10	**.**%*	77.61%	-	-
Service Maintenance	15	<10	**.**%*	26.67%	13	13	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	-	-
Total	1442	1007	69.83%		710	527	156	336	35	63.76%	183	53	129	<10	70.49%			

Racial or Ethnic Minorities (Promo = promotion; RE = Racial or Ethnic Minorities)

Job Category	Prior AAP Total Employee #	Prior AAP Total RE #	Prior AAP Total RE %	Prior AAP Availability RE %	Total Hires & Promo #	Total Hired #	Non-RE Hired #	RE Hired #	Un-known Hired #	RE Hired %	Total Promo #	Non-RE Promo #	RE Promo #	Un-known Promo #	RE Promo %	Actual RE Hiring (%)	RE Had Goals in Prior AAP?	RE Goal Met ?
Officials and Managers	89	16	17.98%	11.71%	50	29	24	<10	<10	**.**%*	21	15	<10	<10	**.**%*	**.**%*	-	-
Professionals	1185	213	17.97%	17.68%	559	405	257	113	35	27.90%	154	117	26	11	16.88 %	24.87%	-	-
Technicians	13	<10	**.**%*	38.46%	<10	<10	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	-	-
Paraprofessionals	<10	<10	**.**%*	0.00%	11	11	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	-	-
Administrative Support	140	26	18.57%	18.57%	60	60	33	15	12	25.00%	<10	<10	<10	<10	**.**%*	23.88%	-	-
Service Maintenance	15	<10	**.**%*	13.33%	13	13	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	Yes	No
Total	1442	262	18.17%		710	527	330	137	60	26.00%	183	138	32	13	17.49%			

Persons with Disabilities (Promo = promotion; PWD = Persons with Disabilities)

Job Category	Prior AAP Total Employee #	Prior AAP Total PWD #	Prior AAP Total PWD %	Prior AAP Availability PWD %	Total Hires & Promo #	Total Hired #	Non-PWD Hired #	PWD Hired #	Un-known Hired #	PWD Hired %	Total Promo #	Non-PWD Promo #	PWD Promo #	Un-known Promo #	PWD Promo %	Actual PWD Hiring (%)	PWD Had Goals in Prior AAP?	PWD Goal Met?
Officials and Managers	89	11	12.36%	9.78%	50	29	18	<10	<10	**.**%*	21	17	<10	<10	**.**%*	22.00%	-	-
Professionals	1185	186	15.70%	10.36%	559	405	279	105	21	25.93%	154	120	25	<10	16.23%	23.26%	-	-
Technicians	13	<10	**.**%*	6.43%	<10	<10	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	-	-
Paraprofessionals	<10	<10	**.**%*	0.00%	11	11	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	-	-
Administrative Support	140	29	20.71%	11.09%	60	60	42	12	<10	20.00%	<10	<10	<10	<10	**.**%*	19.40%	-	-
Service Maintenance	15	<10	**.**%*	13.28%	13	13	<10	<10	<10	**.**%*	<10	<10	<10	<10	**.**%*	**.**%*	Yes	No
Total	1442	231	16.02%		710	527	360	130	37	24.67%	183	143	28	12	15.30%			

Appendix B: Separation Analysis

Total Separations (Sep = Separation; RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Dismissal or Non-Certification	7.02%	62.50%	6.64%	50.00%	15.58%	**.**%*	**.**%*
Resignation	46.49%	64.15%	45.13%	23.27%	48.05%	22.01%	53.85%
Enhanced Separation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Retirement	20.47%	74.29%	23.01%	**.**%*	**.**%*	**.**%*	**.**%*
Death	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*
Lay-off	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*
Termination without Rights	21.93%	61.33%	20.35%	30.67%	29.87%	13.33%	15.38%
Total Separations	100.00%	66.08%	100.00%	22.51%	100.00%	19.01%	100.00%

Officials and Managers (Sep = Separation; RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Dismissal or Non-Certification	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Resignation	48.15%	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Enhanced Separation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Retirement	**.**%*	**.**%*	**.**%*	0.00%	0.00%	**.**%*	**.**%*
Death	**.**%*	**.**%*	**.**%*	0.00%	0.00%	0.00%	0.00%
Lay-off	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*
Termination without Rights	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*
Total Separations	100.00%	66.67%	100.00%	**.**%*	100.00%	**.**%*	100.00%

Professionals (Sep = Separation; RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Dismissal or Non-Certification	7.84%	60.00%	6.90%	**.**%*	**.**%*	**.**%*	**.**%*
Resignation	48.24%	67.48%	47.70%	26.02%	50.79%	21.14%	57.78%
Enhanced Separation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Retirement	20.00%	72.55%	21.26%	**.**%*	**.**%*	**.**%*	**.**%*
Death	*.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*
Lay-off	*.**%*	**.**%*	**.**%*	**.**%*	**.**%*	0.00%	0.00%
Termination without Rights	20.00%	66.67%	19.54%	35.29%	28.57%	**.**%*	**.**%*

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Total Separations	100.00%	68.24%	100.00%	24.71%	100.00%	17.65%	100.00%

Technicians (Sep = Separation; RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Dismissal or Non-Certification	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	0.00%	0.00%
Resignation	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	0.00%	0.00%
Enhanced Separation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Retirement	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Death	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Lay-off	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Termination without Rights	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Separations	100.00%	**.**%*	100.00%	**.**%*	100.00%	0.00%	0.00%

Paraprofessionals (Sep = Separation; RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Dismissal or Non-Certification	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	0.00%	0.00%
Resignation	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	0.00%	0.00%
Enhanced Separation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Retirement	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Death	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Lay-off	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Termination without Rights	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total Separations	100.00%	**.**%*	100.00%	**.**%*	100.00%	0.00%	0.00%

Administrative Support (Sep = Separation; RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Dismissal or Non-Certification	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*
Resignation	35.14%	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*	**.**%*
Enhanced Separation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Retirement	29.73%	100.00%	42.31%	0.00%	0.00%	**.**%*	**.**%*

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Death	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Lay-off	**.**%**	**.**%**	**.**%**	0.00%	0.00%	0.00%	0.00%
Termination without Rights	**.**%**	**.**%**	**.**%**	**.**%**	**.**%**	**.**%**	**.**%**
Total Separations	100.00%	70.27%	100.00%	**.**%**	100.00%	29.73%	100.00%

Service Maintenance (Sep = Separation; RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Separation Type	Total % by Sep Type	Sep Type ¹ Females % within Sep Type	Sep Type ² Sep Type % within Total Females Sep	Sep Type ¹ RE % within Sep Type	Sep Type ² Sep Type % within Total RE Sep	Sep Type ¹ PWD % within Sep Type	Sep Type ² Sep Type % within Total PWD Sep
Dismissal or Non-Certification	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Resignation	**.**%**	**.**%**	**.**%**	0.00%	0.00%	0.00%	0.00%
Enhanced Separation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Retirement	**.**%**	0.00%	0.00%	0.00%	0.00%	**.**%**	**.**%**
Death	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Lay-off	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Termination without Rights	**.**%**	**.**%**	**.**%**	0.00%	0.00%	**.**%**	**.**%**
Total Separations	100.00%	**.**%**	100.00%	0.00%	0.00%	**.**%**	100.00%

Appendix C: Job Category Analysis

Officials and Managers

Job Code	Job Classification
001724	Labor Relations Manager
002695	Agency Chief Financial Officer
003639	State Prog Admin Manager
003679	State Prog Admin Manager Sr
003719	State Prog Admin Manager Prim
008606	Senior Admin Officer
008879	Exec Aide
002691	Financial Mgt Director
002918	Admin Svcs Dir
008880	Exec Assistant
002879	Fiscal & Admin Serv Manager
002320	Economic Development Mgr
002155	Pub Util Regulation Unit Mgr
003215	Emp & Econ Devel Youth Pro Dir
003334	Business Community Dev Dir
003335	Emp & Econ Devel Spec Prog Mgr
003016	Unemployment Ins Director
003484	Unemployment Ins Prog Dir
003483	Dir Employment Programs
000872	Rehabilitation Area Director
001501	Rehabilitation Program Manager
003965	Communications Manager 1
000605	Research Director

Job Code	Job Classification
003944	General Counsel 2
000601	Disability Determ Svc Asst Dir
003641	Emp & Econ Devel Fld Op Re Mgr
008857	Deputy Commr Empl & Econ Devel
000098	Attorney 4
002723	Dir Services For The Blind
002033	Research Plan & Evaluation Dir
003943	General Counsel 1
008853	Asst Commr Empl & Economic Dev
000869	Disability Determ Svc Dir
003966	Communications Manager 2
008178	Commissioner-Empl & Econ Dev

Professionals

Job Code	Job Classification
000006	Management Analyst 1
000141	Buyer 2
000498	Human Resources Specialist 1
000510	Planner Principal State
000604	Research Analyst
000633	Accounting Officer Senior
000634	Management Analyst 4
000652	Human Resources Consultant 1
000812	Planning Dir State
000831	Community Liaison Rep

Job Code	Job Classification
000837	Planner Senior State
000892	Research Analysis Spec
000893	Management Analyst 3
000979	Accounting Officer Inter
001304	Grants Specialist Sr
001500	Accounting Supervisor Princ
001528	Management Analyst 2
001644	Grants Specialist Inter
002241	Grants Specialist Coord
002287	Planner Principal Comm Spec
002687	Safety Administrator
003017	Human Resources Specialist 3
003604	State Prog Admin
003605	State Prog Admin Intermediate
003606	State Prog Admin Sr
003607	State Prog Admin Prin
003608	State Prog Admin Coordinator
003609	State Prog Admin Director
003689	State Prog Admin Supervisor Sr
003712	State Prog Admin Supv Prin
003730	Management Analyst Staff Spec
002390	Accounting Officer Principal
001423	Human Resources Specialist 2
003683	Sign Language Interpreter Spec

Job Code	Job Classification
000004	Accounting Officer
000499	Human Resources Supervisor 4
000428	Library/Info Res Serv Spec
000659	Research Analysis Spec Sr
001393	Library/Info Res Serv Spec Sr
000786	Workforce Development Spec 1
002957	Legal Analyst
002525	Vocational Rehab Placmnt Coord
000658	Rehabilitation Couns Sr
001411	Training & Development Spec 4
000585	Radio Engineer 2
002251	Research Analyst Intermediate
001824	Economic Policy Analyst
002313	Comp Attorney Princ
003002	Emp & Trng Prog Coord
002573	Business Advisor
002500	Veterans Employment Specialist
001052	Rehabilitation Couns Career
002531	Wkfrce Dev Fld Opns Area Mgr 4
002204	Unemployment Ins Prog Spec 3
002930	Unemployment Ins Oper Analyst
002931	Workforce Development Rep
000743	Unemployment Ins Supervisor
001387	Disability Prog Specialist
001706	Unemployment Ins Aud 2

Job Code	Job Classification
000787	Unemployment Ins Prog Spec 1
001795	Emp & Trng Program Spec Sr
002876	Brailist
000598	Rehabilitation Program Spec 3
002875	Braille Specialist
000814	International Trade Rep
002394	Rehabilitation Program Spec 1
003962	Communications Specialist 3
002613	Disability Hearings Officer
002203	Unemployment Ins Prog Spec 2
000870	Disability Specialist
003540	Rehabilitation Couns Supv
002962	Economic Development Spec
002201	Workforce Development Spec 2
000460	Agricultural Outreach Rep
000947	Disability Supervisor
002202	
000871	Disability Examiner
002395	Rehabilitation Program Spec 2
002312	Comp Attorney
001055	Veterans Employment Rep Senior
003961	Communications Specialist 2
002508	Disability Prog Operations Sup
002661	Loan Officer Senior
000599	Rehabilitation Representative

Job Code	Job Classification
000790	Workforce Development Suprvsr
003344	Radio Talking Book Supv
002064	Communication Center Spec
001450	Affirmative Action Off 4
002499	Disability Prog Med Rel Coord
001705	Unemployment Ins Aud 1
002599	Emp & Econ Devel Spec Prog Sup
003947	Staff Attorney 2
003343	Braille Supervisor
003132	Unemployment Ins Aud Spec
003963	Communications Specialist 4
003946	Staff Attorney 1
003960	Communications Specialist 1
000968	Planning Grants Administrator
002418	Community Svcs Program Spec 3
001758	Loan Officer

Technicians (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	Job Classification
000774	Accounting Technician
003834	Electronic Systems Specialist
000938	Electronic Technician Senior
000270	Electronic Technician

Paraprofessionals (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	Job Classification
001486	Human Resources Technician 2
000308	Library Technician
003611	Paralegal
000881	Human Resources Technician 1
008599	Student Worker Para Prof Sr

Administrative Support

Job Code	Job Classification
000293	Exec 2
000632	Account Clerk Senior
002118	Office Services Supervisor 2
002192	Office Services Supervisor 1
003626	Office Specialist
003627	Office & Admin Specialist
003628	Office & Admin Specialist Int
003629	Office & Admin Specialist Sr
003630	Office & Admin Specialist Prin
003632	Central Svcs Admin Spec Inter
003635	Customer Svcs Specialist
003636	Customer Svcs Specialist Int
003637	Customer Svcs Specialist Sr
003638	Customer Svcs Specialist Princ

Job Code	Job Classification
008596	Student Worker Clerical
000001	Account Clerk
002536	Vocational Rehab Technician Sr

Service Maintenance

Job Code	Job Classification
000668	Service Worker
001357	General Repair Worker
001555	Inserting Machine Operator
001040	Offset Press Operator Senior
000912	Offset Press Operator
000103	Automobile Driver

Appendix D: Feeder Jobs

Officials and Managers (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000098	Officials and Administrators	Attorney 4	1.09%	0.00%	0.00%
000601	Officials and Administrators	Disability Determ Svc Asst Dir	0.73%	0.36%	0.73%
000605	Officials and Administrators	Research Director	0.36%	0.00%	0.00%
000869	Officials and Administrators	Disability Determ Svc Dir	0.00%	0.00%	0.00%
000872	Officials and Administrators	Rehabilitation Area Director	1.09%	0.00%	0.00%
001501	Officials and Administrators	Rehabilitation Program Manager	0.00%	0.00%	0.36%
001724	Officials and Administrators	Labor Relations Manager	0.36%	0.00%	0.00%
002033	Officials and Administrators	Research Plan & Evaluation Dir	0.36%	0.00%	0.00%
002155	Officials and Administrators	Pub Util Regulation Unit Mgr	0.36%	0.00%	0.00%
002320	Officials and Administrators	Economic Development Mgr	0.00%	0.00%	0.36%
002691	Officials and Administrators	Financial Mgt Director	0.36%	0.36%	0.00%
002695	Officials and Administrators	Agency Chief Financial Officer	0.36%	0.00%	0.00%
002723	Officials and Administrators	Dir Services For The Blind	0.36%	0.00%	0.00%
002879	Officials and Administrators	Fiscal & Admin Serv Manager	0.36%	0.00%	0.00%
002918	Officials and Administrators	Admin Svcs Dir	0.73%	0.36%	0.00%
003016	Officials and Administrators	Unemployment Ins Director	0.00%	0.00%	0.00%
003215	Officials and Administrators	Emp & Econ Devel Youth Pro Dir	0.36%	0.00%	0.00%
003334	Officials and Administrators	Business Community Dev Dir	1.09%	0.00%	0.36%
003335	Officials and Administrators	Emp & Econ Devel Spec Prog Mgr	1.46%	1.82%	0.36%
003483	Officials and Administrators	Dir Employment Programs	0.73%	0.36%	0.73%
003484	Officials and Administrators	Unemployment Ins Prog Dir	1.09%	0.36%	0.36%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
003639	Officials and Administrators	State Prog Admin Manager	4.38%	1.09%	1.46%
003641	Officials and Administrators	Emp & Econ Devel Fld Op Re Mgr	0.00%	0.36%	0.36%
003679	Officials and Administrators	State Prog Admin Manager Sr	5.11%	0.36%	1.82%
003719	Officials and Administrators	State Prog Admin Manager Prin	4.01%	1.46%	1.09%
003943	Officials and Administrators	General Counsel 1	0.00%	0.00%	0.00%
003944	Officials and Administrators	General Counsel 2	0.36%	0.36%	0.00%
003965	Officials and Administrators	Communications Manager 1	0.36%	0.00%	0.00%
003966	Officials and Administrators	Communications Manager 2	0.36%	0.00%	0.00%
008178	Officials and Administrators	Commissioner-Empl & Econ Dev	0.00%	0.00%	0.00%
008606	Officials and Administrators	Senior Admin Officer	0.36%	0.00%	0.00%
008853	Officials and Administrators	Asst Commr Empl & Economic Dev	0.00%	0.36%	0.00%
008857	Officials and Administrators	Deputy Commr Empl & Econ Devel	0.36%	0.36%	0.00%
008879	Officials and Administrators	Exec Aide	0.36%	0.00%	0.00%
008880	Officials and Administrators	Exec Assistant	0.36%	0.36%	0.00%
003630	Administrative Support	Office & Admin Specialist Prin	2.55%	1.46%	0.00%
000499	Professionals	Human Resources Supervisor 4	0.73%	0.00%	0.36%
000743	Professionals	Unemployment Ins Supervisor	4.74%	0.36%	0.73%
000790	Professionals	Workforce Development Suprvsr	3.65%	0.73%	0.73%
000812	Professionals	Planning Dir State	0.36%	0.00%	0.00%
000947	Professionals	Disability Supervisor	3.65%	0.36%	0.36%
000968	Professionals	Planning Grants Administrator	0.36%	0.00%	0.00%
001450	Professionals	Affirmative Action Off 4	0.36%	0.00%	0.36%
001500	Professionals	Accounting Supervisor Princ	0.73%	0.36%	0.36%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
001824	Professionals	Economic Policy Analyst	0.36%	0.73%	0.36%
002313	Professionals	Comp Attorney Princ	2.55%	0.73%	0.00%
002508	Professionals	Disability Prog Operations Sup	1.46%	0.36%	0.36%
002531	Professionals	Wkfrce Dev Fld Opns Area Mgr 4	0.36%	0.00%	0.36%
002573	Professionals	Business Advisor	0.36%	0.00%	0.00%
002599	Professionals	Emp & Econ Devel Spec Prog Sup	0.00%	0.00%	0.00%
003343	Professionals	Braille Supervisor	0.00%	0.00%	0.36%
003344	Professionals	Radio Talking Book Supv	0.00%	0.00%	0.00%
003540	Professionals	Rehabilitation Couns Supv	8.39%	0.36%	4.38%
003609	Professionals	State Prog Admin Director	2.92%	1.46%	0.73%
003608	Professionals	State Prog Admin Coordinator	5.11%	1.82%	1.09%
003712	Professionals	State Prog Admin Supv Prin	0.36%	0.00%	0.36%
Total			66.42%	17.15%	18.98%

Professionals (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000004	Professionals	Accounting Officer	0.22%	0.07%	0.14%
000006	Professionals	Management Analyst 1	0.14%	0.14%	0.14%
000141	Professionals	Buyer 2	0.14%	0.22%	0.07%
000428	Professionals	Library/Info Res Serv Spec	0.07%	0.00%	0.07%
000460	Professionals	Agricultural Outreach Rep	0.29%	0.29%	0.07%
000498	Professionals	Human Resources Specialist 1	0.22%	0.07%	0.07%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000499	Professionals	Human Resources Supervisor 4	0.14%	0.00%	0.07%
000510	Professionals	Planner Principal State	0.29%	0.14%	0.14%
000585	Professionals	Radio Engineer 2	0.00%	0.00%	0.00%
000598	Professionals	Rehabilitation Program Spec 3	1.37%	0.22%	0.29%
000599	Professionals	Rehabilitation Representative	3.32%	0.36%	1.66%
000604	Professionals	Research Analyst	0.22%	0.07%	0.07%
000633	Professionals	Accounting Officer Senior	0.36%	0.14%	0.00%
000634	Professionals	Management Analyst 4	0.94%	0.36%	0.43%
000652	Professionals	Human Resources Consultant 1	0.22%	0.14%	0.07%
000658	Professionals	Rehabilitation Couns Sr	1.95%	0.43%	0.51%
000659	Professionals	Research Analysis Spec Sr	0.07%	0.00%	0.07%
000743	Professionals	Unemployment Ins Supervisor	0.94%	0.07%	0.14%
000786	Professionals	Workforce Development Spec 1	1.37%	0.43%	0.22%
000787	Professionals	Unemployment Ins Prog Spec 1	1.16%	0.58%	0.29%
000790	Professionals	Workforce Development Suprvsr	0.72%	0.14%	0.14%
000812	Professionals	Planning Dir State	0.07%	0.00%	0.00%
000814	Professionals	International Trade Rep	0.22%	0.07%	0.00%
000831	Professionals	Community Liaison Rep	0.00%	0.07%	0.00%
000837	Professionals	Planner Senior State	0.22%	0.14%	0.00%
000870	Professionals	Disability Specialist	1.95%	0.43%	0.51%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000871	Professionals	Disability Examiner	2.02%	0.87%	0.87%
000892	Professionals	Research Analysis Spec	0.14%	0.14%	0.07%
000893	Professionals	Management Analyst 3	1.01%	0.29%	0.14%
000947	Professionals	Disability Supervisor	0.72%	0.07%	0.07%
000968	Professionals	Planning Grants Administrator	0.07%	0.00%	0.00%
000979	Professionals	Accounting Officer Inter	0.14%	0.00%	0.00%
001052	Professionals	Rehabilitation Couns Career	8.59%	1.16%	2.82%
001055	Professionals	Veterans Employment Rep Senior	0.14%	0.07%	0.36%
001304	Professionals	Grants Specialist Sr	0.65%	0.22%	0.07%
001387	Professionals	Disability Prog Specialist	1.73%	0.29%	0.22%
001393	Professionals	Library/Info Res Serv Spec Sr	0.07%	0.00%	0.00%
001411	Professionals	Training & Development Spec 4	0.07%	0.00%	0.07%
001423	Professionals	Human Resources Specialist 2	0.14%	0.00%	0.00%
001450	Professionals	Affirmative Action Off 4	0.07%	0.00%	0.07%
001500	Professionals	Accounting Supervisor Princ	0.14%	0.07%	0.07%
001528	Professionals	Management Analyst 2	0.14%	0.14%	0.00%
001644	Professionals	Grants Specialist Inter	0.07%	0.00%	0.00%
001705	Professionals	Unemployment Ins Aud 1	0.29%	0.22%	0.29%
001706	Professionals	Unemployment Ins Aud 2	0.00%	0.07%	0.07%
001758	Professionals	Loan Officer	0.07%	0.00%	0.07%
001795	Professionals	Emp & Trng Program Spec Sr	0.29%	0.14%	0.07%
001824	Professionals	Economic Policy Analyst	0.07%	0.14%	0.07%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
002064	Professionals	Communication Center Spec	0.14%	0.07%	0.07%
002201	Professionals	Workforce Development Spec 2	0.43%	0.07%	0.22%
002202	Professionals	Workforce Development Spec 3	1.66%	0.94%	0.51%
002203	Professionals	Unemployment Ins Prog Spec 2	0.51%	0.14%	0.00%
002204	Professionals	Unemployment Ins Prog Spec 3	0.29%	0.00%	0.07%
002241	Professionals	Grants Specialist Coord	0.36%	0.29%	0.07%
002251	Professionals	Research Analyst Intermediate	0.22%	0.07%	0.14%
002287	Professionals	Planner Principal Comm Spec	0.07%	0.07%	0.00%
002312	Professionals	Comp Attorney	0.58%	0.00%	0.07%
002313	Professionals	Comp Attorney Princ	0.51%	0.14%	0.00%
002390	Professionals	Accounting Officer Principal	0.43%	0.51%	0.07%
002394	Professionals	Rehabilitation Program Spec 1	1.08%	0.14%	0.22%
002395	Professionals	Rehabilitation Program Spec 2	1.08%	0.07%	0.51%
002418	Professionals	Community Svcs Program Spec 3	0.07%	0.07%	0.00%
002499	Professionals	Disability Prog Med Rel Coord	0.14%	0.00%	0.00%
002500	Professionals	Veterans Employment Specialist	0.29%	0.00%	0.36%
002508	Professionals	Disability Prog Operations Sup	0.29%	0.07%	0.07%
002525	Professionals	Vocational Rehab Placmnt Coord	1.16%	0.14%	0.79%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
002531	Professionals	Wkfrce Dev Fld Opns Area Mgr 4	0.07%	0.00%	0.07%
002573	Professionals	Business Advisor	0.07%	0.00%	0.00%
002599	Professionals	Emp & Econ Devel Spec Prog Sup	0.00%	0.00%	0.00%
002613	Professionals	Disability Hearings Officer	0.14%	0.00%	0.00%
002661	Professionals	Loan Officer Senior	0.51%	0.29%	0.07%
002687	Professionals	Safety Administrator	0.07%	0.00%	0.00%
002875	Professionals	Braille Specialist	0.07%	0.00%	0.14%
002876	Professionals	Braillist	0.43%	0.00%	0.00%
002930	Professionals	Unemployment Ins Oper Analyst	6.28%	2.09%	1.30%
002931	Professionals	Workforce Development Rep	3.90%	1.37%	1.52%
002957	Professionals	Legal Analyst	0.22%	0.00%	0.00%
002962	Professionals	Economic Development Spec	0.29%	0.00%	0.14%
003002	Professionals	Emp & Trng Prog Coord	0.51%	0.07%	0.14%
003017	Professionals	Human Resources Specialist 3	0.14%	0.07%	0.14%
003132	Professionals	Unemployment Ins Aud Spec	0.07%	0.00%	0.00%
003343	Professionals	Braille Supervisor	0.00%	0.00%	0.07%
003344	Professionals	Radio Talking Book Supv	0.00%	0.00%	0.00%
003540	Professionals	Rehabilitation Couns Supv	1.66%	0.07%	0.87%
003604	Professionals	State Prog Admin	0.22%	0.00%	0.14%
003605	Professionals	State Prog Admin Intermediate	0.29%	0.00%	0.14%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
003606	Professionals	State Prog Admin Sr	0.72%	0.36%	0.43%
003607	Professionals	State Prog Admin Prin	0.87%	0.36%	0.51%
003608	Professionals	State Prog Admin Coordinator	1.01%	0.36%	0.22%
003609	Professionals	State Prog Admin Director	0.58%	0.29%	0.14%
003683	Professionals	Sign Language Interpreter Spec	0.07%	0.00%	0.00%
003689	Professionals	State Prog Admin Supervisor Sr	0.07%	0.00%	0.00%
003712	Professionals	State Prog Admin Supv Prin	0.07%	0.00%	0.07%
003730	Professionals	Management Analyst Staff Spec	0.00%	0.07%	0.00%
003946	Professionals	Staff Attorney 1	0.07%	0.00%	0.00%
003947	Professionals	Staff Attorney 2	0.22%	0.07%	0.07%
003960	Professionals	Communications Specialist 1	0.07%	0.00%	0.00%
003961	Professionals	Communications Specialist 2	0.22%	0.00%	0.07%
003962	Professionals	Communications Specialist 3	0.29%	0.07%	0.00%
003963	Professionals	Communications Specialist 4	0.07%	0.00%	0.00%
000293	Administrative Support	Exec 2	0.07%	0.07%	0.00%
000632	Administrative Support	Account Clerk Senior	0.07%	0.00%	0.00%
002118	Administrative Support	Office Services Supervisor 2	0.14%	0.00%	0.07%
002192	Administrative Support	Office Services Supervisor 1	0.00%	0.07%	0.00%
002536	Administrative Support	Vocational Rehab Technician Sr	5.70%	0.87%	1.59%
003629	Administrative Support	Office & Admin Specialist Sr	0.87%	0.36%	0.29%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
003630	Administrative Support	Office & Admin Specialist Prin	0.51%	0.29%	0.00%
003638	Administrative Support	Customer Svcs Specialist Princ	0.07%	0.00%	0.00%
000308	Paraprofessionals	Library Technician	0.07%	0.00%	0.00%
000881	Paraprofessionals	Human Resources Technician 1	0.00%	0.00%	0.00%
001486	Paraprofessionals	Human Resources Technician 2	0.07%	0.07%	0.00%
003611	Paraprofessionals	Paralegal	0.07%	0.00%	0.07%
Total			69.53%	18.63%	22.09%

Technicians (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000270	Technicians	Electronic Technician	0.00%	0.00%	0.00%
000774	Technicians	Accounting Technician	60.00%	46.67%	20.00%
000938	Technicians	Electronic Technician Senior	0.00%	0.00%	6.67%
003834	Technicians	Electronic Systems Specialist	0.00%	0.00%	6.67%
000001	Administrative Support	Account Clerk	13.33%	6.67%	0.00%
Total			73.33%	53.33%	33.33%

Paraprofessionals (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000308	Paraprofessionals	Library Technician	2.00%	0.00%	0.00%
000881	Paraprofessionals	Human Resources Technician 1	0.00%	0.00%	0.00%
001486	Paraprofessionals	Human Resources Technician 2	2.00%	2.00%	0.00%
003611	Paraprofessionals	Paralegal	2.00%	0.00%	2.00%
008599	Paraprofessionals	Student Worker Para Prof Sr	6.00%	4.00%	0.00%
003626	Administrative Support	Office Specialist	0.00%	0.00%	2.00%
003627	Administrative Support	Office & Admin Specialist	4.00%	0.00%	4.00%
003628	Administrative Support	Office & Admin Specialist Int	22.00%	10.00%	2.00%
003629	Administrative Support	Office & Admin Specialist Sr	24.00%	10.00%	8.00%
003632	Administrative Support	Central Svcs Admin Spec Inter	0.00%	2.00%	0.00%
003635	Administrative Support	Customer Svcs Specialist	2.00%	0.00%	0.00%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
003637	Administrative Support	Customer Svcs Specialist Sr	8.00%	0.00%	0.00%
008596	Administrative Support	Student Worker Clerical	2.00%	2.00%	0.00%
Total			74.00%	30.00%	18.00%

Administrative Support (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000001	Administrative Support	Account Clerk	1.23%	0.61%	0.00%
000293	Administrative Support	Exec 2	0.61%	0.61%	0.00%
000632	Administrative Support	Account Clerk Senior	0.61%	0.00%	0.00%
002118	Administrative Support	Office Services Supervisor 2	1.23%	0.00%	0.61%
002192	Administrative Support	Office Services Supervisor 1	0.00%	0.61%	0.00%
002536	Administrative Support	Vocational Rehab Tech Sr	48.47%	7.36%	13.50%
003626	Administrative Support	Office Specialist	0.00%	0.00%	0.61%
003627	Administrative Support	Office & Admin Specialist	1.23%	0.00%	1.23%
003628	Administrative Support	Office & Admin Specialist Int	6.75%	3.07%	0.61%
003629	Administrative Support	Office & Admin Specialist Sr	7.36%	3.07%	2.45%
003630	Administrative Support	Office & Admin Specialist Prin	4.29%	2.45%	0.00%
003632	Administrative Support	Central Svcs Admin Spec Inter	0.00%	0.61%	0.00%
003635	Administrative Support	Customer Svcs Specialist	0.61%	0.00%	0.00%
003636	Administrative Support	Customer Svcs Specialist Int	0.61%	0.00%	0.61%
003637	Administrative Support	Customer Svcs Specialist Sr	2.45%	0.00%	0.00%
003638	Administrative Support	Customer Svcs Specialist Princ	0.61%	0.00%	0.00%
008596	Administrative Support	Student Worker Clerical	0.61%	0.61%	0.00%

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000103	Service Maintenance	Automobile Driver	1.84%	0.00%	0.61%
000668	Service Maintenance	Service Worker	0.61%	0.00%	0.00%
001555	Service Maintenance	Inserting Machine Operator	0.00%	0.00%	0.00%
Total			79.14%	19.02%	20.25%

Service Maintenance (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Job Code	EEO Category	Job Title	Weighted Females %	Weighted RE %	Weighted PWD %
000103	Service Maintenance	Automobile Driver	18.75%	0.00%	6.25%
000668	Service Maintenance	Service Worker	6.25%	0.00%	0.00%
000912	Service Maintenance	Offset Press Operator	6.25%	0.00%	0.00%
001040	Service Maintenance	Offset Press Operator Senior	0.00%	12.50%	0.00%
001357	Service Maintenance	General Repair Worker	0.00%	0.00%	0.00%
001555	Service Maintenance	Inserting Machine Operator	0.00%	0.00%	0.00%
Total			31.25%	12.50%	6.25%

Appendix E: Determining Availability

Officials and Managers (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Factor	Weight Ratio	Raw Statistics Females	Raw Statistics RE	Raw Statistics PWD	Weighted Statistics Females	Weighted Statistics RE	Weighted Statistics PWD	Source of Statistics	Reasons for External and Internal Weight Ratio
1: External - Percentage of females, persons with disabilities, and racial or ethnic minorities with requisite skills in the reasonable recruitment area.	42.00%	46.87%	7.07%	3.77%	19.69%	2.97%	1.58%	State MN	Data shows that the majority of our Officials and Administrators have been selected internally.
2: Internal - Percentage of females, persons with disabilities, and racial or ethnic minorities among those promotable, transferable, and trainable with your agency.	58.00%	66.42%	17.15%	18.98%	38.53%	9.95%	11.01%	Employee workforce for the job classifications that constitute feeders to this job category.	
The value of weight must equal to 100.00% →	100%	Final Avail %			58.21%	12.92%	12.59%		

Professionals (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Factor	Weight Ratio	Raw Statistics Females	Raw Statistics RE	Raw Statistics PWD	Weighted Statistics Females	Weighted Statistics RE	Weighted Statistics PWD	Source of Statistics	Reasons for External and Internal Weight Ratio
1: External - Percentage of females, persons with disabilities, and racial or ethnic minorities with requisite skills in the reasonable recruitment area.	59.00%	59.98%	14.94%	4.11%	35.39%	8.81%	2.42%	State MN	Internal and external ratios are based on prior hiring data.
2: Internal - Percentage of females, persons with disabilities, and racial or ethnic minorities among those promotable, transferable, and trainable with your agency.	41.00%	69.53%	18.63%	22.09%	28.51%	7.64%	9.06%	Employee workforce for the job classifications that constitute feeders to this job category.	
The value of weight must equal to 100.00% →	100.00%	Final Avail %			63.89%	16.45%	11.48%		

Technicians (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Factor	Weight Ratio	Raw Statistics Females	Raw Statistics RE	Raw Statistics PWD	Weighted Statistics Females	Weighted Statistics RE	Weighted Statistics PWD	Source of Statistics	Reasons for External and Internal Weight Ratio
1: External - Percentage females, persons with disabilities, and racial or ethnic minorities with requisite skills in the reasonable recruitment area.	55.00%	71.84%	7.80%	7.68%	39.51%	4.29%	0.00%	State MN	Internal and external ratios are based on prior hiring data.
2: Internal - Percentage of females, persons with disabilities, and racial or ethnic minorities among those promotable, transferable, and trainable with your agency.	45.00%	73.33%	53.33%	33.33%	33.00%	24.00%	15.00%	Employee workforce for the job classifications that constitute feeders to this job category.	
The value of weight must equal to 100.00% →	100.00%	Final Avail %			54.51%	11.79%	3.75%		

Paraprofessionals (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Factor	Weight Ratio	Raw Statistics Females	Raw Statistics RE	Raw Statistics PWD	Weighted Statistics Females	Weighted Statistics RE	Weighted Statistics PWD	Source of Statistics	Reasons for External and Internal Weight Ratio
1: External - Percentage females, persons with disabilities, and racial or ethnic minorities with requisite skills in the reasonable recruitment area.	100.00%	84.04%	14.33%	4.88%	84.04%	14.33%	4.88%	State MN	Internal and external ratios are based on prior hiring data.
2: Internal - Percentage of females, persons with disabilities, and racial or ethnic minorities among those promotable, transferable, and trainable with your agency.	0.00%	74.00%	30.00%	18.00%	0.00%	0.00%	0.00%	Employee workforce for the job classifications that constitute feeders to this job category.	
The value of weight must equal to 100.00% →	100.00%	Final Avail %			84.04%	14.33%	4.88%		

Administrative Support (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Factor	Weight Ratio	Raw Statistics Females	Raw Statistics RE	Raw Statistics PWD	Weighted Statistics Females	Weighted Statistics RE	Weighted Statistics PWD	Source of Statistics	Reasons for External and Internal Weight Ratio
1: External - Percentage of females, persons with disabilities, and racial or ethnic minorities with requisite skills in the reasonable recruitment area.	69.00%	72.78%	16.89%	3.87%	50.22%	11.66%	2.67%	State MN	Internal and external ratios are based on prior hiring data.
2: Internal - Percentage of females, persons with disabilities, and racial or ethnic minorities among those promotable, transferable, and trainable with your agency.	31.00%	79.14%	19.02%	20.25%	24.53%	5.90%	6.28%	Employee workforce for the job classifications that constitute feeders to this job category.	

Factor	Weight Ratio	Raw Statistics Females	Raw Statistics RE	Raw Statistics PWD	Weighted Statistics Females	Weighted Statistics RE	Weighted Statistics PWD	Source of Statistics	Reasons for External and Internal Weight Ratio
The value of weight must equal to 100.00% →	100.00%			Final Avail %	74.75%	17.55%	8.94%		

Service Maintenance (RE = Racial or Ethnic Minorities; PWD = Persons with Disabilities)

Factor	Weight Ratio	Raw Statistics Females	Raw Statistics RE	Raw Statistics PWD	Weighted Statistics Females	Weighted Statistics RE	Weighted Statistics PWD	Source of Statistics	Reasons for External and Internal Weight Ratio
1: External - Percentage of females, persons with disabilities, and racial or ethnic minorities with requisite skills in the reasonable recruitment area.	70.00%	15.92%	27.38%	15.63%	11.14%	19.16%	10.94%	State MN	Internal and external ratios are based on prior hiring data.
2: Internal - Percentage of females, persons with disabilities, and racial or ethnic minorities among those promotable, transferable, and trainable with your agency.	30.00%	31.25%	12.50%	6.25%	9.38%	3.75%	1.88%	Employee workforce for the job classifications that constitute feeders to this job category.	
The value of weight must equal to 100.00% →	100.00%			Final Avail %	20.52%	22.91%	12.81%		

Appendix F: Utilization-Goal Analysis

Females

Job Categories	Total Number of Employee in Job Category	Total Number of Females Employee in the Job Category	% of Females Employee in the Job Category	Females Availability %	Females Establish Goals?	If Yes, Goals for FY 2024-2026
Officials and Managers	115	75	65.22%	58.21%	No	
Professionals	1261	857	67.96%	63.89%	No	
Technicians	13	<10	**.**%*	72.51%	No	
Paraprofessionals	<10	<10	**.**%*	84.04%	Yes	84.04%
Administrative Support	151	125	82.78%	74.75%	No	
Service Maintenance	16	<10	**.**%*	20.52%	No	
Totals	1565	1077	68.82%			

Racial or Ethnic Minorities (RE)

Job Categories	Total Number of Employee in Job Category	Total Number of RE Employee in the Job Category	% of RE Employee in the Job Category	RE Availability %	RE Establish Goals?	If Yes, Goals for FY 2024-2026
Officials and Managers	115	23	20.00%	12.92%	No	
Professionals	1261	234	18.56%	16.45%	No	
Technicians	13	<10	**.**%*	28.29%	No	
Paraprofessionals	<10	<10	**.**%*	14.33%	No	
Administrative Support	151	31	20.53%	17.55%	No	
Service Maintenance	16	<10	**.**%*	22.91%	Yes	22.91%
Totals	1565	300	19.17%			

Persons with Disabilities (PWD)

Job Categories	Total Number of Employee in Job Category	Total Number of PWD Employee in the Job Category	% of PWD Employee in the Job Category	PWD Availability %	PWD Establish Goals?	If Yes, Goals for FY 2024-2026
Officials and Managers	115	22	19.13%	12.59%	No	
Professionals	1261	278	22.05%	11.48%	No	
Technicians	13	<10	**.**%*	15.00%	No	
Protective Services: Sworn						
Protective Services: Non-sworn						
Paraprofessionals	<10	<10	**.**%*	4.88%	Monitor	
Administrative Support	151	32	21.19%	8.94%	No	
Skilled Craft						
Service Maintenance	16	<10	**.**%*	12.81%	Yes	12.81%
Totals	1565	339	21.66%			