



Equal Employment Opportunity/ Affirmative Action Plan

2010-2012

Grant Wood Area Education Agency extends equal opportunities in its employment practices, educational programs and services, and does not discriminate on the basis of color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law. If you believe you or your child has been discriminated against or treated unjustly, please contact the Agency's Equity Coordinator, Maria Cashman, at 319-399-6847 or 1-800-332-8488 or TDD 319-399-6766, Grant Wood AEA, 4401 Sixth St SW, Cedar Rapids, IA 52404.

Ronald Fielder, Administrator

Maria Cashman, Equity Coordinator

Plan submitted to Grant Wood AEA Board of Directors – June 16, 2010

**Grant Wood Area Education Agency
Equal Employment Opportunity/Affirmative Action (EEO/AA) Plan**

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Identification of the Equity Coordinator

The Grant Wood Area Education Agency Board of Directors specify that an Associate Administrator be assigned the responsibilities of the Equity Coordinator.

Maria Cashman, Associate Administrator
Grant Wood Area Education Agency
4401 6th Street SW
Cedar Rapids IA 52404

1-319-399-6847
1-800-332-8488
TDD: 319/399-6766

Responsibilities of the Equity Coordinator

The Equity Coordinator is responsible for the continued development and coordination of equity efforts. These efforts include to:

1. Implement Agency's EEO/AA plan and ensure review and updating of plan every two years.
2. Review, coordinate and monitor equal employment opportunity and affirmative action efforts.
3. Facilitate the review, coordination and administration of equity compliance evaluation and monitoring systems, which includes quantitative analyses to determine whether under-representation and/or barriers to equal employment opportunity exist.
4. Review, coordinate and administer recordkeeping systems related to various aspects of civil rights compliance.
5. Review, coordinate and administer grievance procedures.
6. Process internal discrimination complaints in an effort to resolve at the local program level.
7. Identify problem areas and monitor steps to alleviate inequitable conditions and situations as they arise.
6. Provide technical assistance to administrators and board members.
7. Provide program development services to educators related to nondiscrimination.
8. Provide training to service delivery staff and others regarding equity legislation.

Advisory Committee 2010-2012

Members of the Grant Wood Area Education Agency Equity Committee are:

George Held, Communications Supervisor
Karen Hoff, School Psychologist
Sara Kane, PEP Partner
Katy Lee, School Social Worker
Ying Liu, Speech-Language Pathologist
Kim Malcolm, School Social Worker
Loretta Mitvalsky, School Social Worker
Kim Owen, Regional Administrator
Jackie Schreder, Human Resources Coordinator
Lynn Tiemann, Speech-Language Pathologist (ELL)
Janine Wahl, Regional Administrator
Ruth White, Retired educator, Diversity Focus Board Member

Advisory Committee Membership and Role

The Grant Wood Area Education Agency Board of Directors has established an advisory committee upon the recommendation of the Administrator. Efforts shall be made for committee membership to include a balance of males and females, a person with disability(ies), and at least one person from each racial/ethnic minority group represented in the regional population. If there are no minority group members available locally, minority resource persons shall be invited to communicate about the Agency's activities on an annual basis. Efforts shall also involve expansion of membership to include greater diversity and representation from client schools and the community.

The committee will establish procedures for frequency of meetings and meeting times. Written agendas and minutes will be accomplished/recorded.

Committee members will be made aware of their advisory capacity and that the administration may not carry out all of the recommendations. At the same time, administration recognizes the responsibility to seriously consider all recommendations made by the committee.

In an effort to keep the committee well informed, administration will provide committee members with copies of federal and state legislation, rules, and guidelines related to equal employment opportunity and affirmative action.

Among the specific responsibilities of the committee should be the following:

- Provide periodic review of and support for the EEO/AA Plan.
- Monitor issues of community interest and concern related to equity in employment, programs and services and provide pertinent information to the administration and board.
- Relay information on employment equity activities to the community at large.
- View all Agency employment policies and practices to assess the degree to which they promote multicultural and gender-fair concepts.
- Promote positive intergroup relations within the community, as well as to foster positive intergroup understanding and skills among the employees and the community.
- Assist the Agency in building a more inclusive workforce and promoting cultural competence.
- Make recommendations to the Agency Board and Administration regarding equity issues related to employment, programs and services.
- Alert Equity Coordinator of conditions or situations of concern.

Advisory Committee Recommendations for 2010-2012

The committee has conducted the analyses and determined proposed goals for 2010-12.



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Administrator's Statement

June 2010

The Grant Wood Area Education Agency has been, and will continue to be, an equal opportunity employer. To actively promote and implement this policy, we will assure that:

- A. Persons are recruited, hired and promoted for all jobs without regard to color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law. Placement decisions are based solely on an individual's qualifications for the position being filled.
- B. Other personnel actions such as compensation, benefits, assignments, transfers, layoffs, recalls, and Agency sponsored programs and activities are administered without regard to color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law.

The Equal Employment Opportunity/Affirmative Action plan contained herein helps guide our work in this effort. Affirmative action will be taken in job categories where appropriately qualified women, men, minorities and/or persons with disabilities are under-represented. Reasonable accommodations will be provided whenever possible in our efforts to advance employment opportunities for persons with disabilities. Equal opportunity shall also be extended to programs and services.

I have a strong commitment to equal opportunity and affirmative action. I expect continued assistance and support from Agency staff in attaining the objectives of equal opportunity and achieving our affirmative action goals.

Sincerely,

Ronald Fielder, Chief Administrator

Overview

The Grant Wood Area Education Agency Equal Employment Opportunity/Affirmative Action Plan includes the Board policies, duties of the coordinator and committee, quantitative and qualitative analyses, plus the goals for action. The Board policies establish the legal foundation. The regulations that accompany the policies outline an administrative procedure to implement the Board policies.

Board Policies

Following are the Grant Wood Area Education Agency's Equal Employment Opportunity/Affirmative Action policies and their accompanying administrative regulations. These policies and administrative regulations are reviewed by the Grant Wood AEA Board of Directors as part of their ongoing review of board policies and include:

- Policy #4119** Equity in Employment, Programs and Services (includes procedure for complaints of discrimination in Agency programs or services)
- Policy #4120** Agency Personnel: Equal Employment Opportunity and Affirmative Action
- Policy #4121** Workplace Environment
- Policy #4122** Agency Personnel: Complaint Procedure (procedure for employee complaints of discrimination in Agency employment practices)
- Policy #4123** Agency Personnel: Harassment or Bullying

Equity in Employment, Programs and Services **Policy # 4119**

Date Adoption: October 15, 1987
Date Modified: December 15, 1993
Date Reviewed: May 21, 1997
Date Modified: April 21, 1999

Date Modified: May 15, 2002
Date Modified: May 10, 2006
Date Modified: July 18, 2007 (3000 Series)
Date Modified: November 13, 2007 (4000 Series)

The Grant Wood Area Education Agency shall extend equal opportunities in its employment practices, educational programs and services and shall not discriminate on the basis of color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law.

Any complaint of alleged discriminatory conduct shall be properly investigated as rapidly as possible in accordance with complaint procedures established by Administration. If a complaint is not satisfactorily resolved at the Administrator level, the Board authorizes the timely use of a Board committee to hear the complaint, make a full determination for resolution of the complaint, and submit its recommendation to the Board of Directors.

Discrimination by an Agency employee is misconduct. An employee who violates this policy may be subject to disciplinary action, up to and including termination.

*Legal Reference: Iowa Code (2007) Ch 19B, 20, 35C, 73, 216, 256, 280.
Sec 504, Vocational Rehabilitation Act of 1973, Sec 84.4(a) and 84.8(a).
Title IX of the Educational Amendments of 1972, Sec 86.9(a).
Office of Civil Rights Guidelines for Vocational Educ, Sec IV.*

Equity in Employment, Programs and Services **Administrative Regulation # 4119A**

Date Adopted: October 15, 1987
Date Modified: October 31, 1991
Date Modified: December 15, 1993
Date Reviewed: May 21, 1997
Date Modified: May 15, 2002

Date Reviewed: May 10, 2006
Date Reviewed: September 20, 2006
Date Modified: November 13, 2007
Date Modified: April 16, 2008

Any complaint of alleged discriminatory conduct or practices, or any dispute involving the interpretation or application of this policy shall be processed by the Agency in accordance with the following procedures and shall be executed as rapidly as possible:

Level One –

Employment Practices

Employees with a complaint of discrimination in Agency employment practices shall follow the Agency's complaint procedure outlined in Policy/Regulation #4122. A job applicant with a complaint of discrimination in Agency employment practices shall first discuss it with the Human Resources Office. If the matter cannot be resolved informally, the complaint may proceed to the Equity Coordinator for discussion and/or to initiate the formal procedure at the following levels.

In the event the Equity Coordinator becomes aware of an issue for which no complaint has been made, the Equity Coordinator or designee has the authority to initiate an investigation in the absence of a complaint.

Programs and Services

Employees with a complaint of discrimination in Agency programs or services shall first discuss it with their immediate supervisor, with the objective of resolving the matter informally. If the matter cannot be resolved informally, the complaint may proceed to the staff member's Associate Administrator. A student, parent or volunteer with a complaint of discrimination in Agency programs or services shall first discuss it with the AEA staff member involved, with the objective of resolving the matter informally. If the matter cannot be resolved informally, the complaint may proceed to the immediate supervisor. If the matter cannot be resolved with the immediate supervisor, the complaint may proceed to the staff member's Associate Administrator. If the matter cannot be resolved with the Associate Administrator, the complaint may proceed to the Equity Coordinator for discussion and/or to initiate the formal procedure at the following levels.

Level Two – If the complaint is not resolved at Level One and the complainant wishes to pursue the complaint, he/she may file a signed, written complaint with the Agency's Equity Coordinator. The complaint shall state the nature of the complaint and the remedy requested. The filing of the formal, written complaint at Level Two must be within fifteen (15) business days from the date of the initial Level One meeting regarding the complaint. The complainant may request that a meeting concerning the complaint be held with the Equity Coordinator or alternate. A minor student may be accompanied at that meeting by a parent or guardian. The Equity Coordinator or alternate shall investigate the complaint and attempt to resolve it. A signed, written report from the Equity Coordinator regarding action taken shall be sent within fifteen (15) business days after receipt of the complaint.

Level Three – If the complaint is not resolved at Level Two, the complainant may process it to Level Three by presenting a written appeal to the Administrator within ten (10) business days after the complainant receives the report from the Equity Coordinator. The complainant may request a meeting with the Administrator or his/her designee. The Administrator or his/her designee has the option of meeting with the complainant to discuss the appeal. A decision shall be rendered by the Administrator or his/her designee within ten (10) business days after receipt of the written appeal.

Level Four – If the complaint has not been resolved to the satisfaction of the complainant at Level Three, the complainant may file a notice in writing to the Administrator or designee within ten (10) business days of the decision at Level Three that the complaint be submitted to a Board Committee composed of at least two (2) Board members. Within fifteen (15) business days after receipt of the Level Four notice, the Board Committee shall meet to hear the complaint.

After hearing the complaint, the Board Committee shall make a full determination for resolution of the complaint and submit its recommendation to the Grant Wood AEA Board of Directors at its next regular meeting. The decision shall be rendered in writing by the Administrator to the complainant within five (5) business days of the Board's action. The decision on the matter shall be final and shall not be precedential.

This procedure in no way denies the right of the complainants to file formal complaints with the Iowa Civil Rights Commission, the Federal Office of Civil Rights or other agencies available for mediation or rectification of civil rights complaints, or to seek private counsel for complaints alleging discrimination.

Equity Coordinator: Maria Cashman
Office Address: 4401 6th St SW, Cedar Rapids, IA 52404
Phone Number: 319/399-6847
Office Hours: 8 a.m. to 4:30 p.m., Monday through Friday

*Legal Reference: Sec 504 of the Vocational Rehab Act (1973) Sec 84.4(a) and 84.8(a).
Title II of ADA, Title VII of the 1964 Civil Rights Act
Title IX of the Educational Amendments of 1972, Sec 86.9(a)
Iowa Code (2007), Ch 19B, 20, 35C, 73, 216, 256, 280*

Agency Personnel: Equal Employment Opportunity and Affirmative Action Policy # 4120

Date Adopted:	May 16, 1984	Date Modified:	November 18, 2002
Date Modified:	April 16, 1990	Date Modified:	May 10, 2006
Date Reviewed:	March 16, 1994	Date Reviewed:	October 18, 2006
Date Modified:	March 19, 1997	Date Modified:	July 18, 2007
Date Reviewed:	November 15, 1999	Date Modified:	March 19, 2008

The Agency shall actively promote fair employment practices to attract quality individuals and will administer equal opportunity and affirmative action efforts in the recruitment, appointment, assignment and advancement of employees.

An individual shall be provided equal employment opportunities regardless of color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise protected by law. Affirmative action will be taken in job categories where appropriately qualified women, men, minorities, and persons with disabilities are underrepresented.

To ensure fair, consistent and nondiscriminatory hiring practices, Administration will implement standard selection procedures as outlined in the Equal Employment Opportunity and Affirmative Action (EEO/AA) Plan. Recruitment of Agency personnel shall be the responsibility of the Chief Administrator. The Chief Administrator shall make use of the Human Resources Office and may include other staff members as may be practical and effective.

An Associate Administrator will serve as Equity Coordinator. The Equity Coordinator will have the responsibility for coordinating the development and ongoing implementation of the (EEO/AA) Plan. The EEO/AA Plan will be reviewed and approved by the Board at least every two years.

Legal Reference: Iowa Code Ch. 19B.11 (2007)

Agency Personnel: Equal Employment Opportunity and Affirmative Action Administrative Regulation #4120A

Date Adopted:	April 16, 1990	Date Modified:	November 18, 2002
Date Reviewed:	March 16, 1994	Date Reviewed:	May 10, 2006
Date Modified:	March 19, 1997	Date Modified:	July 18, 2007
Date Modified:	November 15, 1999	Date Modified:	April 16, 2008

To advance the Agency's commitment to equal employment opportunity, affirmative action and diversity, the Agency shall implement ongoing training for those who are charged with the administration of Agency policies. Training may also be made available to other interested employees to further develop cultural competence within the Agency.

The Agency's complaint procedures (Policies/Regulations #4119 and #4122) provide a fair and reasonable solution to complaints relating to alleged violations of this policy. The procedure encourages open dialogue to seek a positive solution. Inquiries regarding compliance with this policy or complaints related to this policy may also be directed to the Equity Coordinator or local, state or federal offices (Policy/Regulation #4121).

*Legal Reference: Iowa Code Ch. 19B.11
29 U.S.C. Sct 621-34
42 U.S.C. Sct 2000e et seq.
281 Iowa Adm Code 11.4; 12.4; 84-88; 95*

Workplace Environment Policy # 4121

Date Adopted: September 17, 1990
Date Modified: March 16, 1994
Date Reviewed: December 18, 1996
Date Reviewed: December 15, 1999

Date Modified: December 18, 2002
Date Modified: May 10, 2006
Date Modified: April 16, 2008

The Agency will provide for a fair, supportive and non-discriminatory work environment for all employees regardless of color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise protected by law. The Agency prohibits discrimination on the basis of any of these individual characteristics and will respond promptly to allegations of discrimination in accordance with Policy/Regulation #4122.

Discrimination by an Agency employee is misconduct. An employee who violates this policy may be subject to disciplinary action, up to and including termination.

Legal Reference: Iowa Code 601.A(9) (2007)

Workplace Environment Administrative Regulation # 4121A

Date Adopted: September 17, 1990
Date Modified: March 16, 1994
Date Modified: December 18, 1996
Date Modified: December 15, 1999

Date Modified: February 20, 2002
Date Modified: December 18, 2002
Date Modified: May 10, 2006
Date Modified: April 16, 2008

To ensure a fair, supportive and nondiscriminatory work environment will be provided for all employees regardless of their color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise protected by law, the Agency's complaint procedure (Policy/Regulation #4122) provides a constructive means to consider complaints relating to alleged violations of this policy. The procedure encourages open dialogue to seek a fair and reasonable solution.

Complaints or inquiries regarding compliance with this policy may also be directed to the Equity Coordinator:
Maria Cashman, Associate Administrator
4401 6th Street SW
Cedar Rapids, IA 52404
319-399-6847

Inquiries may also be directed, in writing, to:
Intake Department, Iowa Civil Rights Commission
Grimes State Office Building
400 E 14th St
Des Moines, IA 50319-1004
1-800-457-4416;

Director of the Chicago District Office
United States Equal Employment Opportunity Commission
500 West Madison Street
Suite 2800
Chicago, Illinois 60661
1-800-669-4000 (EEOC National Contact Center); or

EEOC Representative, Milwaukee Area Office
United States Equal Employment Opportunity Commission
Reuss Federal Plaza
310 West Wisconsin Avenue, Suite 800
Milwaukee, WI 53203-2292
1-800-669-4000 (EEOC National Contact Center)

Such inquiry or complaint to the state or federal office may be done instead of, or in addition to, an inquiry or complaint at the local level.

Further information and copies of the procedures for filing a complaint are available in the Agency's Human Resources Office or online at <http://www.state.ia.us/government/crc>, www.eeoc.gov/field/chicago or www.eeoc.gov/field/milwaukee.

Legal Reference: (Code of Iowa) 601.A(9)

Agency Personnel: Complaint Procedure
Policy # 4122

Date Adopted: April 16, 1984
Date Modified: April 20, 1994
Date Modified: January 15, 1997

Date Modified: December 15, 1999
Date Modified: December 18, 2002
Date Modified: May 10, 2006

The Agency will provide a process for resolving employee complaints regarding equity issues related to equal opportunity/affirmative action, workplace environment, harassment, and/or working conditions.

The Board firmly believes concerns should be resolved at the lowest organizational level by those individuals closest to the concern. Whenever a complaint or concern is brought to the attention of the Board, it will be referred to Administration to be resolved.

Any complaint under this policy shall be properly investigated as rapidly as possible. If a complaint is not satisfactorily resolved at the administrative level, the Board authorizes the timely use of a Board committee to hear the complaint, make a full determination for resolution of the complaint, and submit its recommendation to the Board of Directors.

Discrimination or harassment by an Agency employee is misconduct. An employee who violates this policy may be subject to disciplinary action, up to and including termination.

Legal Reference: Iowa Code Ch. 20 (2007)

Agency Personnel: Complaint Procedure
Administrative Regulation # 4122A

Date Adopted: April 16, 1984
Date Revised: June 20, 1988
Date Reviewed: April 20, 1994
Date Reviewed: January 15, 1997
Date Modified: December 15, 1999

Date Modified: December 18, 2002
Date Modified: May 10, 2006
Date Modified: July 18, 2007
Date Modified: October 17, 2007
Date Modified: March 19, 2008

This complaint procedure provides a constructive means to consider complaints concerning alleged behaviors related to the following identified areas. This procedure encourages open dialogue to seek a fair and reasonable solution. Complaints through the various levels shall be properly investigated and brought to closure as rapidly as possible. The complainant may be represented at all levels of the complaint procedure.

Information regarding a complaint shall be confidential to the extent possible, and those individuals who are involved in the complaint/investigation process shall not discuss information regarding the complaint outside the investigation process.

No one shall retaliate against an employee because they have filed a complaint, assisted or participated in a complaint investigation, proceeding or hearing regarding a complaint.

In the event the Equity Coordinator becomes aware of an issue for which no complaint has been made, the Equity Coordinator or designee has the authority to initiate an investigation in the absence of a complaint.

Equal Opportunity and Affirmative Action

Individuals shall be provided equal employment opportunities regardless of color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise protected by law. Affirmative action shall be taken in job categories where appropriately qualified women, men, minorities, and persons with disabilities are under-represented.

Workplace Environment

A fair and supportive work environment shall be provided for all employees regardless of their color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise protected by law. The Agency prohibits discrimination on the basis of any of these individual characteristics.

Harassment

Harassment includes unwelcome behavior related to, but not limited to, color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law. Other types of harassment may include, but not be limited to, sexual harassment, jokes, stories, pictures, objects, communications or actions that are offensive, tend to alarm, annoy, demean, intimidate, abuse or pose a threat of bodily injury to individuals and/or groups.

Sexual harassment shall include, but not be limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile or offensive working environment.

Working Conditions

Working conditions shall be defined as:

- 1) Items not included in the list of employer rights as defined in Section 20.7, Code of Iowa, 1987, or as thereafter amended; or,
- 2) Items which are accessible as mandatory subjects of bargaining under Section 20.9, Code of Iowa, 1987, or as thereafter amended; or,
- 3) Items which are grievable under an existing collective bargaining agreement, unless specifically identified as non-grievable.

Complaint Procedures

An employee with a complaint against a fellow employee is encouraged to first discuss the complaint directly with the fellow employee in a constructive and professional manner, with the objective of resolving the matter informally. If the matter cannot be resolved informally, the complaint shall be properly investigated at each of the following levels.

Level One – Within five (5) Agency days of the date of the occurrence giving rise to the complaint or from the date the complainant might reasonably have ascertained its occurrence, an employee with a complaint shall first discuss it with the employee's immediate supervisor, with the objective of resolving the matter informally. Allegations against an individual in the supervisory chain shall be appealed to the supervisor's immediate supervisor. Individuals wishing to report to someone other than the supervisor, may contact the Equity Coordinator as appropriate (Policy/ Regulation #4145).

Level Two – If the complaint cannot be resolved informally, the complainant may file the complaint in writing with the immediate supervisor. The written complaint shall state the nature of the complaint and a recommended solution. The filing of the formal written complaint must be within ten (10) Agency days of the Level One conference. The immediate supervisor may request a meeting with the complainant to discuss the complaint. This request shall be made within five (5) Agency days of the date of filing and the meeting shall be scheduled to be

held no later than ten (10) Agency days following the date of the filing. The supervisor shall make a decision on the complaint and communicate it in writing to the complainant within ten (10) Agency days of the date of filing, or if a meeting has been requested, within ten (10) Agency days of such meeting.

Level Three – If the complaint has not been resolved to the satisfaction of the complainant at the second level, the complainant may file, within ten (10) Agency days of the supervisor's decision at the second level, a copy of the complaint with the Administrator or designee. Within ten (10) Agency days after such a written complaint is filed, the complainant and the Administrator or designee shall meet to seek to resolve the complaint. The Administrator or designee shall make a decision on the complaint and communicate it in writing to the complainant within ten (10) Agency days of such meeting.

Level Four – If the complaint has not been resolved to the satisfaction of the complainant at the third level, the employee may file a request in writing to the Administrator or designee within ten (10) Agency days of the decision at the third level that the complaint be submitted to a committee which shall consist of at least two (2) members of the Board designated by the President. Within five (5) Agency days after receipt of the Level Four request, the Board committee shall notify the complainant in writing of the time and place of the requested meeting, such meeting to be held within fifteen (15) Agency days after receipt of the Level Four request.

After hearing the complaint, the Board Committee shall make a full determination for resolution of the complaint and submit its recommendation to the Grant Wood AEA Board of Directors at its next regular meeting. The decision shall be rendered in writing to the complainant within five (5) Agency days of the Board's action. The decision on the matter shall be final and shall not be precedential.

Legal Reference: Iowa Code 20.7; 20.18 (2007)

Agency Personnel: Harassment or Bullying
Policy # 4123

Date Adopted:	April 16, 1984	Date Modified:	January 15, 2003
Date Reviewed:	April 20, 1994	Date Modified:	May 10, 2006
Date Modified:	January 15, 1997	Date Modified:	November 13, 2007
Date Modified:	December 15, 1999		

To promote a fair, supportive and safe work and school environment, harassment or bullying of individuals is prohibited by federal, state and local policy and shall not be tolerated in the Agency. Agency employees, volunteers and students on Agency property, premises, vehicles or facilities or while engaged in Agency business or present at any Agency function or Agency-sponsored activity shall not engage in harassing or bullying behavior and shall not engage in reprisal, retaliation or false accusation against a victim, witness or an individual who has reliable information about an act of harassment or bullying. (Volunteer means an individual who has regular, significant contact with students.) This policy is also in effect if the misconduct directly affects the good order, efficient management and welfare of the Agency.

The Agency shall take action deemed appropriate to protect individuals from harassment or bullying.

The Agency shall promptly and reasonably investigate allegations of harassment or bullying. The Equity Coordinator or designee shall be responsible for handling all complaints alleging harassment or bullying. Any employee, volunteer or student whose behavior is alleged to be in violation of this policy shall be subject to an investigation procedure under Policy #4122 (allegations by employees), Administrative Regulation #4123B (allegations by students) or Administrative Regulation #4119A (allegations by volunteers), as appropriate.

Any person who promptly, reasonably and in good faith reports an incident of harassment or bullying under this policy to an Agency official shall be immune from civil or criminal liability relating to such report and to the person's participation in any administrative, judicial or other proceeding related to the report.

Retaliation against any person because the person has filed a harassment or bullying complaint or assisted or participated in such an investigation or proceeding is also prohibited. Individuals who knowingly file false harassment or bullying complaints and any person who gives false statements in an investigation shall be subject to discipline by appropriate measures, as shall any person who is found to have retaliated against another in violation of this policy.

Harassment or bullying by an Agency employee is misconduct. An employee who violates this policy may be subject to disciplinary action, up to and including termination. A volunteer who violates this policy may be subject to measures up to and including exclusion from Agency property. A student who violates this policy may be disciplined by appropriate measures up to and including suspension and expulsion.

This policy shall be available on the Agency's web site and, at least annually, the policy shall be communicated through the Agency newsletter.

*Legal Reference: Sec 703, Title VII 29 Code of Federal Regulations
Chapter XIV, Section 1604.11*

Agency Personnel: Harassment or Bullying
Administrative Regulation # 4123A

Date Adopted:	April 16, 1984	Date Modified:	January 15, 2003
Date Reviewed:	April 20, 1994	Date Modified:	May 10, 2006
Date Modified:	January 15, 1997	Date Modified:	July 18, 2007
Date Modified:	December 15, 1999	Date Modified:	November 13, 2007

Harassment against individuals includes unwelcome behavior related to, but not limited to, color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law. Harassment against students also includes bullying, hazing or other victimization of students based on any of the following actual or perceived traits or characteristics, including but not limited to age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status or familial status. Other types of harassment against individuals may include, but not be limited to, sexual harassment, jokes, stories, pictures, objects, verbal or nonverbal communications or actions that are offensive, tend to alarm, annoy, demean, intimidate, abuse, pose a threat of bodily injury or have the purpose or effect of causing injury, discomfort, fear or suffering to the victim(s).

Sexual harassment shall include, but not be limited to, unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or student's education,
- submission to or rejection of such conduct by an individual is used as the basis for employment or academic decisions affecting such individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or student's academic performance by creating an intimidating, hostile or offensive environment.

The Agency's complaint procedures provide a constructive means to consider complaints relating to alleged harassment and encourage open dialogue to seek a fair and reasonable solution. (See Administrative Regulation #4122A for allegations by employees, Administrative Regulation #4123B for allegations by students or Administrative Regulation #4119A for allegations by volunteers.) Inquiries or complaints may also be directed to the Equity Coordinator or local, state or federal offices (Policy/Regulation #4121).

Legal Reference: Sec 703, Title VII

Agency Personnel: Harassment or Bullying against Students **Administrative Regulation # 4123B**

Date Adopted: November 13, 2007

Harassment or bullying against students includes any electronic, written, verbal or physical act or conduct toward a student which is based on any actual or perceived trait or characteristic of the student and which creates an objectively hostile school environment that meets one or more of the following conditions:

- Places the student in reasonable fear of harm to the student's person or property;
- Has a substantially detrimental effect on the student's physical person or property;
- Has the effect of substantially interfering with the student's academic performance; or
- Has the effect of substantially interfering with the student's ability to participate in or benefit from the services, activities or privileges provided by a school.

"Electronic" means any communication involving the transmission of information by wire, radio, optical cable, electromagnetic or other similar means. "Electronic" includes but is not limited to communication via electronic mail, internet-based communications, pager service, cell phones, electronic text messaging or similar technologies.

In situations between students and Agency officials, staff or volunteers who have direct contact with students, bullying and harassment may also include the following behaviors:

- Requiring that a student submit to bullying or harassment by another student, either explicitly or implicitly, as a term or condition of the targeted student's education or participation in school programs or activities; or
- Requiring submission to or rejection of such conduct as a basis for decisions affecting the student.

Students who feel that they have been harassed should:

- Communicate to the harasser that the student expects the behavior to stop, if the student is comfortable doing so. If the student wants assistance communicating with the harasser, the student should ask a teacher, counselor or administrator to help.
- If the harassment does not stop, or the student does not feel comfortable confronting the harasser, the student should:
 - Tell a teacher, counselor or administrator; and
 - Write down exactly what happened, keep a copy and give another copy to the teacher, counselor or administrator including:
 - What, when and where it happened;
 - Who was involved;
 - Exactly what was said or what the harasser did;
 - Witnesses to the harassment;
 - What the student said or did, either at the time or later;
 - How the student felt; and
 - How the harasser responded.

Complaint Procedure

Students who believe they have been harassed or bullied shall notify Maria Cashman, the designated investigator. The alternate investigator is Trace Pickering. The investigator may request the individual submit a written complaint and turn over evidence of the harassment, including but not limited to letters, tapes or pictures. The complainant shall be given a copy of the completed complaint. Information received during the investigation is to be kept confidential to the extent possible.

The investigator, with the approval of the individual's supervisor, or the individual's supervisor has the authority to initiate an investigation in the absence of a written complaint.

Investigation Procedure

The investigator shall reasonably and promptly begin the investigation upon receipt of the complaint. The investigator shall interview the complainant and the alleged harasser. The alleged harasser may file a written statement in response to the complaint. The investigator may also interview witnesses as deemed appropriate.

Upon completion of the investigation, the investigator shall make written findings and conclusions as to each allegation of harassment and report the findings and conclusions to the supervisor.

Resolution of the Complaint

Following receipt of the investigator's report, the supervisor may investigate further, if deemed necessary, and make a determination of any appropriate additional steps that may include discipline.

Prior to the determination of the appropriate remedial action, the supervisor may, at the supervisor's discretion, interview the complainant and the alleged harasser. The supervisor shall file a written report closing the case and documenting any disciplinary action taken or any other action taken in response to the complaint. The complainant, the alleged harasser and the investigator shall receive notice as to the conclusion of the investigation. The investigator shall maintain a log of information necessary to comply with the Iowa Department of Education reporting procedures.

Conflicts

If the investigator is a witness to the incident, the alternate investigator shall investigate.

Legal Reference: Sec 703, Title VII

Workforce Analysis

An analysis of the Agency's workforce was conducted. Each employee has been asked to submit data on gender, race/ethnicity, and disability at the time of hire. Disabled employees primarily reflect those who have self identified and the Agency has not required the filing of an accommodation request through ADA to be classified as disabled. For confidentiality reasons, only a total number of disabled are reported rather than by category.

Work Force 2009-2010

Job Categories	Total		Gender				Ethnicity				Disability			
	#	%	M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	6	1.2	5	83.3	1	16.7	6	100.0						
Office Clerical	43	8.5	1	2.3	42	97.7	43	100.0						
Officials & Mgrs	32	6.3	8	25.0	24	75.0	32	100.0						
Professionals	350	69.4	49	14.0	301	86.0	345	98.6	5	1.4				
Technicians	73	14.5	10	13.7	63	86.3	72	98.6	1	1.4				
TOTAL	504	100.0	73	14.5	431	85.5	498	98.8	6	1.2	6	1.2	493*	97.8

* 5 declined to disclose

Work Force 2008-2009

Job Categories	Total		Gender				Ethnicity				Disability			
	#	%	M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	6	1.2	5	83.3	1	16.7	6	100.0						
Office Clerical	45	9.0	1	2.2	44	97.8	45	100.0						
Officials & Mgrs	32	6.4	10	31.3	22	68.8	32	100.0						
Professionals	340	68.0	52	15.3	288	84.7	334	98.2	6	1.8				
Technicians	77	15.4	13	16.9	64	83.1	76	98.7	1	1.3				
TOTAL	500	100.0	81	16.2	419	83.8	493	98.6	7	1.4	4	.8	491*	98.2

* 5 declined to disclose

Work Force 2007-2008

Job Categories	Total		Gender				Ethnicity				Disability			
	#	%	M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	6	1.2	5	83.3	1	16.7	6	100.0						
Office Clerical	39	7.9	1	2.6	38	97.4	39	100.0						
Officials & Mgrs	31	6.3	10	32.3	21	67.7	31	100.0						
Professionals	340	68.5	50	14.7	290	85.3	333	97.9	7	2.1				
Technicians	80	16.1	17	21.3	63	78.8	79	98.8	1	1.2				
TOTAL	496	100.0	83	16.7	413	83.3	488	98.4	8	1.6	6	1.2	485*	97.9

* 5 declined to disclose

Work Force 2006-2007

Job Categories	Total		Gender				Ethnicity				Disability			
	#	%	M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	6	1.2	5	83.3	1	16.7	6	100.0						
Office Clerical	43	8.8	1	2.3	42	97.7	43	100.0						
Officials & Mgrs	31	6.3	10	32.3	21	67.7	31	100.0						
Professionals	332	67.6	48	14.5	284	85.5	326	98.2	6	1.8	3	.9	325	97.9
Technicians	79	16.1	15	19.0	64	81.0	78	98.7	1	1.3	1	1.3	77	97.5
TOTAL	491	100.0	79	16.1	412	83.9	484	98.6	7	1.4	7	1.4	479*	97.6

* 5 declined to disclose

Relevant Labor Market

The Grant Wood Area Education Agency (GWAEA) Equity Advisory Committee utilized Iowa Affirmative Action Data 2008, available from Iowa Workforce Development at www.iowaworkforce.org, which includes the State of Iowa Population Status data (2006); Labor Force Status data for the State of Iowa and Linn and Johnson counties (2007); and State of Iowa Workforce Development Center Applicants data for 2009.

When recruiting for staff vacancies, local, regional and/or national searches are conducted depending on the job category of the vacancy. Questions regarding relevant labor market (below) are utilized when conducting searches. Recruitment activities consider the goals established to affirmatively recruit qualified women, men, members of diverse racial/ethnic groups, and persons with disabilities for job categories where under-representation exists.

Factors for Determining Our Relevant Labor Market for Recruitment

The Grant Wood Area Education Agency recruits employees from a wide variety of locations. In most circumstances, advertising for hourly staff will occur locally; regional and/or national searches may be conducted for contracted, salaried and management staff.

The following questions are asked when determining the labor market in which to advertise for new candidates.

1. Where do current employees live?
2. What are the required qualifications for this position?
3. Where may persons who hold those qualifications reside?
4. Are internal candidates an option for the position?
5. Will the location where we choose to advertise provide us an adequate supply of candidates?
6. What are the race and gender characteristics of people from that location who possess the qualifications?
7. Will the successful candidate be within commuting distance?
8. Would a candidate move from a distant location to take a position?
9. What recruitment mechanisms have been used in the past?

Promotability Analysis

Employment actions involving transfer, promotion and re-assignment are based on employee qualifications and the needs of the Agency, in accordance with policies established by the Board. External and internal opportunities are communicated and all interested employees may apply for consideration. Vacancies and assignment openings are updated and communicated on a weekly basis. No problem areas or barriers to equal opportunity have been identified.

Mobility Analysis

A mobility analysis is completed every two years with the intent to examine staff advancement within the Agency. Staff advancement includes an increased pay level, a change in employee classification, and/or a voluntary change of job category. As a result, advancement may also include lateral changes, which are noted in the analysis. The analysis will help reveal if barriers exist in the advancement of current employees.

The changes in job status for the previous four years from 2006-10 revealed 2.9% of staff who experienced some form of advancement were in under-represented categories pertaining to ethnicity and/or disability; for the prior two years from 2008-10 2.6% of staff who attained some advancement were in these under-represented categories. This mobility is consistent with the total percentage of minority and/or disabled employee population figures for these time periods.

When reviewing mobility data based on gender over the 2006-10 review period, males represented 9.4% of the advancements. On average, the total percentage of male employees for this timeframe was 15.9%. When analyzing the gender data, one explanation for this difference is the two EEO categories with the highest percentage of male employees (craft workers and officials/managers) have more limited advancement opportunities. When analyzing the mobility related to promotions, males represented 27.8% of these advancements and minority or disabled employees represented 5.5%, which are both at a rate above their availability in the employee population.)

As a result of this analysis, no problem areas or barriers to equal opportunity have been identified.

Vacancy Analysis

In addition to local demographics, vacancy analysis is another consideration in the adoption of numerical goals. The vacancies for the past two years were examined by employee group. Projected vacancies for the next two years were based on the average number of vacancies per year over the past five-year period.

Quantitative Analysis: Progress toward Reaching 2008-10 Numerical Goals

The table below depicts the Numerical Goals that had been established in the 2008-10 EEO/AA Plan. As indicated in the shaded area, two of the four numerical goals were achieved.

Job Category	Under-Representation	Projected Vacancies Based on 5-Yr Average	2008-10 Numerical Goal	Results	Actual Vacancies	# of Applicants	Applicant Representation
Office/clerical	Ethnic minority, disabled, gender (male)	6	1 ethnic minority, disabled or male	Met	3*	29	1 non-white (3.4%) 0 male (0%) 1 disabled (3.4%) (90% responded) (1 visual)
Professional	Ethnic minority, disabled, gender (male)	46	3 ethnic minority, disabled or male	Met	78	446	5 non-white (1.1%) 84 male (18.8%) 7 disabled (1.6%) (83% responded) (63 visual)
Officials/managers	Ethnic minority & disabled	4	1 ethnic minority or disabled	Not met	7	71	0 non-white (0%) 28 male (39.4%) 0 disabled (0%) (97% responded) (3 visual)
Technicians	Ethnic minority & disabled	32	2 ethnic minority or disabled	Not met	21	300	18 non-white (6.0%) 47 male (15.7%) 8 disabled (2.7%) (80% responded) (45 visual)

* 2 of the vacancies were internal postings only

Proposed Numerical Goals 2010-2012

Based on workforce and vacancy analyses, as well as state and local demographic data, the Advisory Committee identified areas of under-representation and it was determined the following proposed numerical goals be retained for the new plan:

Job Category	Projected Vacancies Based on Past 5 Year Average	2010-12 Numerical Goal
Office/clerical	4	1 individual from one or more of the following under-represented groups: <ul style="list-style-type: none"> ◆ Gender (male) ◆ Ethnic Minority ◆ Disability
Professional	66	3 individuals from one or more of the following under-represented groups: <ul style="list-style-type: none"> ◆ Gender (male) ◆ Ethnic Minority ◆ Disability
Officials/managers	4	1 individual from one or more of the following under-represented groups: <ul style="list-style-type: none"> ◆ Ethnic Minority ◆ Disability
Technicians	18	2 individuals from one or more of the following under-represented groups: <ul style="list-style-type: none"> ◆ Ethnic Minority ◆ Disability

Under-representation occurs when individuals in a protected class are employed at a rate below their availability in the work force. For Linn and Johnson counties, the total minority labor force available for 2007 is 6.0% and 10.3% respectively, while in 2009-10 the total minority population employed by the Agency is 1.4%. It's estimated, however, the availability of minorities able to work in the particular occupations of the Agency is lower than the total minority work force. It's believed that one major barrier for making progress in minority staffing has been the requirement for advanced degrees and specialized licenses that are necessary to be eligible for the majority of positions at the Agency. Qualitative goals include an ongoing effort to inform and encourage qualified employees and potential employees in under-represented categories of job opportunities with the Agency. Note: While males are not considered a protected class, efforts are made to promote gender balance in a field where the majority of positions tend to be held by women.

Review Progress toward 2008-10 Qualitative Goals

1. **Broaden the recruitment "net"** to further include minority and disabled communities and/or media, such that vacancy notices are more apt to communicate with under-represented individuals and groups. As a step in this direction, the Equity Committee recommends the Agency:
 - ◆ Devote FTE to proactive recruitment efforts to attract individuals from under-represented groups. These strategies could include:
 - Forming partnerships with postsecondary education institutions, and/or diversity programs for purposes of personalized recruitment, job shadows/internships, employment and sharing information on agency openings.
 - Making presentations about GWAEA employment opportunities
 - Investigating scholarship/mentorship options that would identify talented future employees from under-represented groups and support their postsecondary education in exchange for a commitment to work at the Agency.
 - ◆ Continue to post openings at the Catherine McCauley Center, University of Iowa Dual Career Network, UI, ISU and UNI placement offices and the private college diversity network coordinated through the African American Center in Cedar Rapids.
 - ◆ Expand organizations to which job posting will be sent to include the NAACP, Iowa Vocational Rehabilitation Services and other organizations with ties to community groups

- ◆ Continue to review job seeker credentials referred by community organizations and invite applicants who appear to meet qualifications to apply

Results:

- FTE has been devoted to proactive recruitment efforts. Efforts have included coordinating SLP and School Psychologist recruitment at UNI and UI, developing targeted recruitment materials for conferences and workshops, and developing presentations about GWAEA employment opportunities to fieldwork students.
- Partnerships were established with community agencies to identify potential employment opportunities for disabled individuals.
- Job postings for professional positions were expanded and contacts now include University of Iowa Ed Placement, department chairs and Dual Career Network; Iowa State University; University of Northern Iowa CareerCat and department chairs and private Iowa colleges that provide preparation programs in PT, OT and computer programming including St Ambrose, Loras, Luther, Mt Mercy and Coe. Technology vacancies are also posted with Des Moines Area and Kirkwood community colleges.
- Job postings for hourly positions include University of Iowa Office of Student Financial Aid (JobNet), Catherine McCauley Center, Goodwill Industries, Iowa Workforce Development and Kirkwood Community College.

2. **Develop training modules** to enhance cultural competence and explore belief systems across job categories within the Agency. Consider common Agency learning for cultural competence and the development/delivery of one or more core training modules. At this time, it's recommended that each region conduct at least one training in this area per year, rather than requiring a mandatory, all- Agency staff development.

The committee discussed the need for the training module(s) to define cultural competence. Regions could be asked to identify their biggest cultural competence/diversity training need for the districts they serve (e.g., serving students who have moved here from inner city areas; serving Spanish speaking recent arrivals) and tailor training around those issues. A needs assessment or zoomerang survey may be used, for example, to identify: 1) the biggest population shifts; 2) struggles districts are facing. It was noted that a survey should include a definition of cultural competence.

Results:

- August 8, 2008, all Agency staff attended a presentation by Marcella David, Associate Provost at the University of Iowa. Marcella's role at the university is Special Assistant to the President for Equal Opportunity and Diversity.
- Work has begun on an ELL assessment for AEAs to determine and support professional development needs.
- Cultural competency training was provided to new contracted staff in the fall of 2009-2010.
- Regions that serve districts with disproportionality have identified professional development goals within their Action Plans to better develop cultural competencies with AEA and LEA staff in 2009-2010.

3. **Develop mentoring and induction supports for newly hired staff** from under-represented groups to help job retention. Supports could include job-related assistance & making community/social connections.

Results:

- FTE has been devoted to the coordination and alignment of the Mentoring and Induction program supports. A comprehensive program has been developed that includes alignment between trained mentors committed to weekly contact, supervisors, discipline groups, region teams, and differentiated learning experiences based on the individual and professional needs.
- Individual demographics, interests, and job category are considerations for mentoring partnerships.

4. **Continue staff development for Agency managers** related to supervision practices, the current EEO/AA Plan, and nondiscrimination policies.

Results:

- Time continues to be devoted on management team agendas to review and discuss procedural issues, to ensure consistent and equitable administration practices.
- Learning opportunities provided during the current year include: cultural competencies, Fierce Conversations, and Learning Supports. Additional learning opportunities are explored on an ongoing basis.

5. **Continue to offer PD session(s) open to all AEA staff** which informs them on prevention of harassment in the workplace, Agency nondiscrimination policies and existence of the EEO/AA plan.

Results:

- The Professional Development Office offered 36 courses and/or workshops related to the area of diversity or cultural competence. This includes one workshop for sexual harassment, which had to be cancelled due to lack of enrollment. Of the 36 opportunities available, a total of 9 events were cancelled. For the 27 activities that were held, a minimum of 9 AEA and/or LEA participants is required.
- Topics made available during 2008-10 include Exploring Diversity; Program-wide Positive Behavior Supports; Improving the Learning of English Language Learners in the Preschool Setting; Communicating with Co-workers; Survivor Spanish for School Administrators, Teachers and Support Staff; RESPECT; Mentoring for Equity and Human Relations Training.
- An online cultural competence course was available 6 different times through a third party, however each session was cancelled due to insufficient registrations. The cost of these programs may be a contributing factor to the lack of interest, and other alternatives will continue to be considered.

6. **Website changes:** act on equity audit of the Agency webpage, with particular attention to: a) take steps to translate parent-relevant aspects of our website into other languages, based on an analysis of the native languages by children/families in our districts; b) incorporate a mechanism for user feedback

Results:

- A translation link appears on the Agency web page.
- Additional channels for feedback include Staff Idea form on Agency website and a comment section on the Agency's facebook page.

7. **Print material changes:** Act on equity audit of Agency printed materials, with particular attention to a) translating critical materials in these languages; b) specify printed materials in the languages of the service area how translated materials and interpretation services can be obtained; c) Develop a formal process for regular and systematic collection of evaluative feedback from families regarding language accessibility and quality of the Agency's print materials and other communication services; and educators regarding the quality of print materials and other communication services.

Results:

- A limited number of documents have been translated into Spanish and are available on the website.
- A TransAct link on the ELL web page is available and will be reviewed for ease of use and accessibility.

8. **Review as a committee suggested actions of equity audit pertaining to personnel procedures.** It's anticipated this component of the audit will be available early Fall 2008.

Results:

- Committee reviewed recommendations from the Equity Audit and identified additional or clarifying qualitative goals.

Proposed 2010-12 Qualitative Goals & Strategies (Some same or similar goals continue from the prior plan.)

The committee identified the following:

1. Continue efforts to **broaden the recruitment “net”** to further include minority and disabled communities and/or media, such that vacancy notices are more apt to communicate with under-represented individuals and groups. These strategies include ongoing work to:
 - ◆ Maintain devoted FTE and develop a team for proactive recruitment efforts to attract individuals from under-represented groups. These activities include:
 - Forming partnerships with post secondary education institutions, and/or diversity programs for purposes of personalized recruitment (i.e. job shadows, internships, practicum, fieldwork experiences), employment and sharing information on Agency openings.
 - Making presentations and providing information about GWAEA employment opportunities in person and through electronic formats including participation in job fairs and/or professional conferences.
 - Potentially exploring scholarship/mentorship options that would identify talented future employees from under-represented groups and support their postsecondary education in exchange for a commitment to work at the Agency.
 - Updating GWAEA job vacancy page to include web 2.0 tools (twitter, video clips, e-recruiting, etc.) for recruiting purposes.
 - ◆ Continue expanded posting of job openings and further develop network to include the NAACP, Iowa Vocational Rehabilitation Services, professional organization websites, Diversity Focus and other organizations with ties to community groups. The private college diversity network, coordinated through the African American Museum in Cedar Rapids, can also be explored.
 - ◆ Continue to review job seeker credentials referred by community organizations and invite applicants who appear to meet qualifications to apply.
2. Provide information on **area community/social/network opportunities and resources** to interviewed candidates.
3. **Develop mentoring and induction supports for newly hired staff** from under-represented groups to help job retention. Supports could include job-related assistance & making community/social connections.
4. Develop **professional development modules** to move along the cultural proficiency continuum and explore belief systems across job categories within the Agency. Consider common Agency learning for cultural proficiency and the development/delivery of one or more core professional development modules. At this time, it’s recommended that all Agency staff participate in a needs assessment and at least one professional development module per year based on assessment data, rather than requiring a mandatory, all-Agency staff development.
5. **Continue staff development for Agency managers** related to supervision practices, the current EEO/AA Plan, and nondiscrimination policies.
 - ◆ Integrate diversity leadership proficiencies within the Learning and Leadership meetings through a two-year book study for managers: *Cultural Proficiency: A Manual for School Leaders*.
6. Explore the value of the **Diversity Focus training modules** by having members of the Grant Wood AEA equity advisory committee attend a minimum of two modules.
7. Continue to **provide information on web access and to offer PD sessions open to all AEA staff** which informs them on prevention of harassment in the workplace, Agency nondiscrimination policies and existence of the EEO/AA plan.

8. **Enhance the Agency web site to add user-friendly tools** for individuals whose native language is not English. These may include:
- ◆ Increasing visibility for translation capability on the Agency home page.
 - ◆ Providing text versions of Agency brochures that can be translated.
 - ◆ Adding a parent feedback link.
 - ◆ Adding information about interpretation and translation assistance.

Plan Distribution

The Grant Wood Area Education Agency shall disseminate the Equal Employment Opportunity/Affirmative Action Plan and policies as follows:

- ◆ A copy of the plan will be provided to each Grant Wood AEA Board Member.
- ◆ A copy will be available for public use in the Human Resources Office and in the Grant Wood AEA Professional Library.
- ◆ A copy of the plan is posted on the Agency web site.
- ◆ Following approval from the Board, Agency employees will be notified of the adopted plan and its locations via internal newsletters.
- ◆ A copy will be made available to the Iowa Director of Education upon request.
- ◆ The Agency's EEO/AA policy statement shall be distributed to all applicants for employment and, on an annual basis, to employees, recruitment sources and the public.

Policy Statement Distribution

The Agency's EEO/AA policies are distributed to all applicants for employment and, on an annual basis, to employees, recruitment sources and the public via notice in newspapers of the 7-county area.

Physical Facilities Analysis

The management staff responsible for facility operations submitted this summary of Grant Wood AEA facilities:

1. **4401-6th St SW, Cedar Rapids, Iowa**
This is the main facility for the Agency. Parking for persons with disabilities and an elevator provide access to second floor. Also, the signage accommodates the needs of all individuals.
2. **200 Holiday Rd, Coralville, Iowa**
This building is a single story with a handicapped entrance and parking. Signage and grading accommodate the needs of all individuals.
3. **1120-33rd Ave SW, Cedar Rapids, Iowa**
This is the most recent facility acquired by the Agency. This building has been made into business condominiums and the Agency owns the first and second floors of the office complex. An elevator provides access to facilities on the second floor. The signage is being updated to accommodate the needs of all individuals. We will be discussing with the building owner's association repair of some concrete breaks in side walks near the entry to the building as well as some re-striping of parking spaces for persons with disabilities as needed to improve access to the main entry.