NOWCAP Services

Affirmative Action Plan

for

Individuals with Disabilities

Plan Year October 1, 2021 to September 30, 2022

Affirmative Action Plan for Individuals with Disabilities

Table of Contents

Page

Facility Data 1

Introduction 2

Policy Statement 3

Review of Personnel Processes 4

Physical and Mental Qualifications 5

Reasonable Accommodations to Physical and Mental Limitations 6

Harassment 7

External Dissemination of Policy, Outreach and Positive Recruitment 8

Outreach and Positive Recruitment Self-Assessment 10

Internal Dissemination of Policy 11

Audit and Reporting System 12

Training 12

Facility Data

Facility:	NOWCAP Services
Address:	345 North Walsh Drive Casper, Wyoming 82605
Name and Title of Top Executive and EEO Officer:	Renate Pullen Executive Director (307) 237-9146

Introduction

Since 1985, NOWCAP Services has been providing innovative and cutting edge support services for adults and children with intellectual disabilities (such as Mental Retardation, Autism, seizure disorders, Cerebral Palsy, etc.) and adults who have a brain injury (acquired or traumatic). The organization provides services to people throughout the state of Wyoming and currently serves approximately 45 participants. NOWCAP Services is part of Northwest Community Action Programs of Wyoming, Inc. which has been in existence since 1965.

Our program uses a whole person concept to service provision that includes balanced mental and physical well-being, personalized goals, and real-world experiences to create a therapeutic environment in which our participants can live each day with purpose. Support services include community living (group home or apartment), day services, vocational training, community inclusion, transportation, behavior support, medical/health support, Occupational, Speech, and Physical Therapy, life skills and assessment.

NOWCAP Services is certified by the Wyoming Department of Health annually and has been accredited by CARF since 1986.

This Affirmative Action Plan has been adopted in order to comply with requirements of the OFCCP and Section 503 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 793). The adoption of the Affirmative Action Program and the setting of goals are not to be interpreted as an admission that NOWCAP Services has discriminated against any person or class of individuals at any time.

This Affirmative Action Plan has been developed in reliance upon the regulations of the Department of Labor found primarily at 41 CFR [60-741] and is not intended to create contract rights between NOWCAP Services and its employees or any other third party, including applicants, by which any employee or applicant is entitled to any beneficial interest.

Confidential information concerning personnel data, business plans, and trade secrets that are exempt from the Freedom of Information Act is contained within this Affirmative Action Plan. No portion of the Affirmative Action Plan is to be released to any person or government agency without first obtaining the written consent of NOWCAP Services.

Policy Statement

[60-741.44(a)]

Affirmative Action for Individuals with Disabilities

It is the policy of NOWCAP Services not to discriminate against any employee or applicant for employment because of mental or physical disability, in regard to any position for which the employee or applicant is qualified, and to take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

An "individual with a disability" includes any person who has a physical or mental impairment that substantially limits one or more of that person's major life activities, has a record of such an impairment, or is regarded as having such an impairment.

We recognize our obligation to communicate this policy in such a manner as to foster understanding, acceptance and support among our managers, supervisors and other employees.

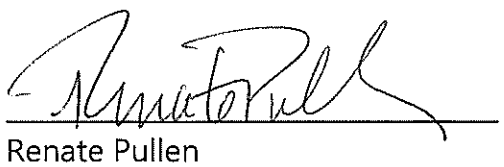
We are committed to personnel practices that recruit, hire, train and promote persons in all job titles. We make good faith efforts so that all personnel actions are administered without regard to disability, and that employment decisions are based only on valid job requirements.

We have implemented an audit and reporting system to assist our organization in: measuring the effectiveness of this Program; indicating the need for remedial actions; determining the degree to which our objectives are being attained; determining whether individuals with known disabilities are able to participate in NOWCAP Services-sponsored educational, training, recreational and social activities; and otherwise measuring our compliance with our Affirmative Action Program.

Our policy is that employees and applicants will not be subjected to harassment, intimidation, threats, coercion or discrimination for filing a complaint, assisting or participating in an investigation, or any other activity related to the administration of section 503 or any other Federal, State or local law requiring equal opportunity for individuals with disabilities.

I have overall responsibility for implementing this Program. Appropriate sections of the Affirmative Action Plan for Individuals with Disabilities may be examined during regular business hours by arrangement with my office at (307) 237-9146.

As of October 1, 2021



Renate Pullen
Executive Director

Review of Personnel Processes

[60-741.44(b)]

NOWCAP Services periodically reviews human resource processes to provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities that are offered and available to employees.

Personnel processes are reviewed to assure that they do not stereotype individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. NOWCAP Services ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies. NOWCAP Services reviews such processes and makes necessary modifications to carry out these obligations.

NOWCAP Services' procedures include the following:

- Applicants are invited at the pre-offer and post-offer stage to inform NOWCAP Services whether they believe they are an individual with a disability using the language and manner prescribed by the Director of OFCCP. Completed forms are kept in a separate, confidential location.

- This information is stored so as to be readily retrievable for review by the Department of Labor and human resources representatives for use in investigations and internal compliance activities.

- Where applicants or employees are selected for hire, promotion or training and NOWCAP Services undertakes any reasonable accommodation, a confidential record will contain a description of the accommodation.

Physical and Mental Qualifications

[60-741.44(c)]

NOWCAP Services adheres to a schedule for the review of physical and mental job qualification requirements. To the extent that physical or mental qualifications were found to screen out qualified individuals with disabilities, the review ensured that they are job-related and consistent with business necessity and the safe performance of the job.

Whenever NOWCAP Services applies physical or mental qualification standards in the selection of applicants or employees for employment or other change in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified individuals with disabilities, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity and health and safety in the workplace.

Reviews of job qualifications may be conducted when vacancies occur, when job descriptions are updated or as new positions are created.

Reasonable Accommodations to Physical and Mental Limitations

[60-741.44(d)]

NOWCAP Services will continue to make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability unless it can be shown that the accommodations would impose undue hardship on business operations or cause a direct threat to workplace safety.

NOWCAP Services has taken the following steps to provide accommodations:

- Designated parking spaces are available close to the buildings for individuals with disabilities.
- Wheelchair-friendly facilities include ramp access, curb cuts, automatic door openers, easily accessible restrooms, and wide aisles.
- Door levers are installed throughout the buildings instead of doorknobs.
- Equipment and facility modifications may be made on an as-needed basis.
- An Accessibility Plan has been developed and implemented. This plan identifies and monitors barriers and plans for rectifying them throughout the year.

Harassment

[60-741.44(e)]

NOWCAP Services has developed and implemented procedures to ensure that employees with disabilities are not subjected to unlawful harassment. An employee who feels or believes that they are being harassed for an unlawful reason may contact their supervisor/manager, the Executive Director at (307) 237-9146, or the Chief Executive Officer at (307) 347-6185. The employee may also use the Procedure for Reporting Workplace Harassment as outlined in the Policy & Procedures manual.

External Dissemination of Policy, Outreach, and Positive Recruitment

[60-741.44(f)]

NOWCAP Services undertakes outreach and positive recruitment for the employment and advancement of individuals with disabilities. These activities may include any or all of the following:

- NOWCAP Services sends written notification of the company policy related to its affirmative action efforts to all subcontractors, vendors and suppliers requesting their assistance in furthering the principles of EEO and AA.

- NOWCAP Services enlists the assistance and support of recruiting sources, including the State Job Service locations where openings occur, One Stop Career Centers, state vocational rehabilitation agencies or facilities, entities funded by the Department of Labor such as EARN, sheltered workshops, college placement offices, state education agencies, and organizations of or for individuals with disabilities, to help fulfill NOWCAP Services' commitment to provide meaningful employment opportunities to qualified individuals with disabilities.

- Briefing sessions may be held with representatives from recruiting sources which could include: facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of NOWCAP Services' selection process, and recruiting literature. Arrangements may be made for referral of applicants, follow-up with sources and feedback on disposition of applicants.

- For those jobs where NOWCAP Services hires directly from schools, recruitment efforts include efforts to reach students with disabilities. When appropriate, NOWCAP Services may consider recruitment activities at educational institutions which participate in training of individuals with disabilities, such as schools for the blind, deaf, or learning disabled. If NOWCAP Services elects to participate in work-study programs, then consideration will be given to work-study programs with rehabilitation facilities and schools which specialize in training or educating individuals with disabilities.

- As needed, NOWCAP Services may contact appropriate vocational rehabilitation agencies or facilities, social service agencies, or organizations of and for individuals with disabilities for advice, technical assistance, and referral of potential employees.

- If employees are used in consumer, promotional or help-wanted advertising, NOWCAP Services may include individuals with disabilities. Consideration will be given to inviting employees with disabilities to participate on behalf of the organization in career days, youth motivation programs and related community activities.

- NOWCAP Services will give consideration to ways to attract qualified individuals with disabilities not currently in the work force who have requisite skills and can be recruited through affirmative action measures.

- In making hiring decisions, NOWCAP Services considers applicants with known disabilities for the available positions for which they apply.

- NOWCAP Services makes the affirmative action policy available to external applicants on the company website and/or applicant portal.

- NOWCAP Services states in all solicitations or advertisements for employees that all qualified applicants will receive consideration for employment and will not be discriminated against on the basis of disability.

- NOWCAP Services will include the equal opportunity clause concerning the employment of qualified individuals with disabilities in all non-exempt subcontracts and purchase orders.

Outreach and Positive Recruitment Self-Assessment

[60-741.44(f)(3) & (4)]

- NOWCAP Services has established a system for documenting the outreach and recruitment activity over the previous twelve months to evaluate the effectiveness of its efforts to identify and recruit qualified individuals with disabilities.

- NOWCAP Services has documented the criteria used to evaluate their effectiveness of each effort and NOWCAP Services' conclusion as to whether each effort was effective.

- NOWCAP Services collects data, including number of openings, jobs filled, total applicants, total hires, and total applicants and hires who self-identified as individuals with disabilities, in order to further evaluate the effectiveness of its efforts to recruit qualified individuals with disabilities.

- NOWCAP Services maintains these records as required and retains these records as required.

- Where NOWCAP Services concludes the totality of its efforts was not effective, alternative efforts will be reviewed and additional recruitment strategies implemented.

Internal Dissemination of Policy

[60-741.44(g)]

NOWCAP Services' internal procedures have been designed to foster understanding, acceptance, and support among executives, managers, supervisors and other employees and to encourage such persons to take the necessary actions to aid NOWCAP Services in meeting this obligation.

NOWCAP Services' affirmative action policy may be disseminated internally in any of the following ways:

- The policy is included in the employee Policy & Procedures manual.
- The policy is made available to applicants and employees on the company website and/or via the intranet. The policy is provided to employees who are working remotely via intranet or email.
- Employees and prospective employees are informed of NOWCAP Services' commitment to engage in affirmative action to increase employment opportunities for qualified individuals with disabilities. Meetings may be held with employees to discuss this policy and explain individual employee responsibilities.
- The policy is posted on appropriate NOWCAP Services bulletin boards. As needed, the policy is available as a reasonable accommodation in accessible formats and locations.
- When appropriate, briefings may be held for executive, management and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the attitude of top management.
- The policy may be discussed in new employee orientations and in management training programs.
- Articles about the accomplishments of employees with disabilities may be included in NOWCAP Services publications.
- When employees are featured in employee handbooks or similar publications for employees, individuals with disabilities may be included.

Audit and Reporting System

[60-741.44(h)]

NOWCAP Services has designed and implemented an audit and reporting system that:

- Measures the effectiveness of NOWCAP Services' Affirmative Action Program.
- Indicates any need for remedial action.
- Determines the degree to which objectives are being attained.
- Determines whether individuals with known disabilities have had the opportunity to participate in NOWCAP Services-sponsored educational, training, recreational and social activities.
- Measures compliance with affirmative action obligations.

NOWCAP Services has established procedures to document actions taken to comply with these obligations and has evaluated the overall effectiveness of its Affirmative Action Program. Where appropriate, NOWCAP Services will identify problem areas and develop action-oriented programs to address identified areas.

Training

[60-741.44(j)]

Employees involved in recruitment, screening, selection, promotion, discipline and related processes shall receive training to ensure that the commitments in NOWCAP Services' Affirmative Action Program are being implemented.