

**NOWCAP Services**

**Affirmative Action Plan**

**for**

**Women and Minorities**

**Plan Year October 1, 2023 to September 30, 2024**

# Affirmative Action Plan for Women and Minorities Narrative

## Table of Contents

	Page
Facility Data.....	1
Introduction.....	2
Policy Statement.....	3
Designation of Responsibility for Implementation.....	4
Identification of Problem Areas.....	5
Action-Oriented Programs.....	6
Internal Audit and Reporting System.....	8

## Facility Data

Facility:	NOWCAP Services
Address:	345 North Walsh Drive Casper, WY 82605
Name and Title of Top Executive and EEO Officer:	Dawn Lacko 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, and access to 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 Executive Order 11246. The adoption of the Affirmative Action Program and the setting of goals and timetables are not to be interpreted as an admission that NOWCAP Services has discriminated against any person or class of individuals at any time.

Adoption of this Affirmative Action Plan is in reliance upon and in conformity with the Affirmative Action Guidelines of the EEOC, 29 CFR Part 1608, and Section 713(b)(1) of Title VII of the Civil Rights Act of 1964.

This Affirmative Action Plan has been developed in reliance upon the regulations of the Department of Labor found primarily at 41 CFR [60-2] 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

### Affirmative Action Program

The directors and officers of NOWCAP Services have long held the belief that our objectives can best be achieved by utilizing to the fullest extent the human resources available to us. This policy statement is intended to remind employees that our policy is to not discriminate in employment. We take affirmative action so that discrimination does not occur on the basis of race, color, sex, sexual orientation, gender identity, religion, national origin, physical or mental disability, or veteran's status. Employment decisions will be made so as to further the principle of equal employment opportunity.

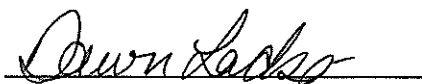
NOWCAP Services strives to hire, recruit, train, and promote employees in job classifications without regard to race, color, sex, sexual orientation, gender identity, religion, national origin, disability, or veteran's status. Employment decisions, such as compensation, benefits, transfers, layoffs, return from layoffs, training, NOWCAP Services-sponsored education, tuition assistance, social, and recreation programs will be administered without discrimination. Only valid job requirements will be imposed for promotional opportunities, so that promotion decisions are in accordance with the principles of equal employment opportunity.

NOWCAP Services also prohibits any harassment of employees based on race, color, sex, sexual orientation, gender identity, religion, national origin, disability, or veteran's status. Any incidents of harassment should be reported immediately to the employee's supervisor/manager, the Executive Director, or the Chief Executive Officer. Reports will be investigated and appropriate disciplinary action will be taken, which may include discharge, if prohibited harassment is found to have occurred.

NOWCAP Services prohibits discrimination against applicants or employees based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees.

Each manager, supervisor, and employee is responsible for carrying out our equal employment policy. I have overall responsibility for this Program and can be reached at (307) 237-9146.

As of October 1, 2023



Dawn Lacko  
Executive Director

## **Designation of Responsibility for Implementation**

[60-2.17(a)]

NOWCAP Services' Executive Director has direct responsibility and accountability for this Affirmative Action Program. This person has the necessary authority, resources, support of, and access to top management to ensure the effective implementation of this Affirmative Action Program.

## **Identification of Problem Areas**

[60-2.17(b)]

NOWCAP Services annually performs an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity exist.

### **Organizational Units and Job Groups**

An organization profile is created as a workforce analysis, according to [60-2.11(c)] and identifies the name of the unit/department, the job title, gender, race of the unit supervisor and the number of incumbents by job title, gender and race in order of wage rates.

The workforce utilization by job group is evaluated for women and minority utilization and distribution. Utilization goals are developed where necessary and evaluated for progress.

### **Personnel Activity**

An adverse impact analysis of personnel activity is conducted and analyzed for selection disparities in relevant areas such as external hiring, internal competitive activity and layoffs.

### **Compensation System**

A compensation analysis is conducted to determine whether there are discrepancies based on gender, race or ethnicity.

### **Selection, Recruitment, Referral and Other Personnel Activity**

Selection, recruitment, referral and other personnel activity are monitored for compliance with Equal Employment and affirmative action requirements.

## **Action-Oriented Programs**

[60-2.17(c)]

NOWCAP Services reviews all Organizational Units and Job Groups for problem areas and has developed the following action-oriented programs to address any problem areas that may be identified.

### **Good Faith Efforts**

- Posts openings internally, giving all qualified employees the opportunity to apply.
- Encourages employees currently in the workforce to prepare themselves for advancement within the organization.
- Utilizes its external website, [www.nowcapervices.org](http://www.nowcapervices.org), for announcing open positions and for providing a printable application.
- Posts open positions on recruitment websites as needed as well as utilizing social media website Facebook for announcing job postings.
- Advertises job openings in local newspapers and on local radio stations as needed.
- Includes EEO tagline in employment related materials and media advertising.
- Send announcement of job openings to the Wyoming State Employment Division as needed.
- Participates in job fairs as needed for recruitment.
- Advertises open positions at local colleges as needed.
- Enlists the services of a professional firm specializing in the area of Affirmative Action/Equal Employment Opportunity to advise and assist in the development of its Affirmative Action Plan.

### **Personnel Activity**

NOWCAP Services will continue to monitor personnel activity and develop action-oriented programs when required.

### **Compensation System**

NOWCAP Services will continue to monitor employee pay for non-discrimination on account of gender, race or ethnicity.

### **Selection, Recruitment, Referral and Other Personnel Activity**

NOWCAP Services will continue investigating methods to attract more women and minorities through its current recruitment and selection efforts.

## **Internal Audit and Reporting System**

[60-2.17(d)]

NOWCAP Services has developed and implemented an audit and reporting system that periodically measures the effectiveness of its total Affirmative Action Program. Internal monitoring of this Program includes, but is not limited to:

- Monitoring records of all personnel activity at all levels, including referrals, placements, transfers, promotions, terminations and compensation, to ensure that the non-discriminatory policy is carried out.
- Requiring internal reporting on a scheduled basis as to the degree with which equal employment opportunity and organizational objectives are attained.
- Reviewing report results with all levels of management.
- Advising top management of the Program's effectiveness and submitting recommendations to improve unsatisfactory performance.