

AFFIRMATIVE ACTION PLAN

Fiscal Year 2026

WESTERN EGYPTIAN ECONOMIC
OPPORTUNITY COUNCIL IS AN EQUAL
OPPORTUNITY EMPLOYER

Presented to the Illinois Department of
Commerce and Economic
Opportunity

Western Egyptian Economic Opportunity Council Inc.

AFFIRMATIVE ACTION PLAN

for

Illinois Department of Commerce
and Economic Opportunity

Adopted ~ XX/XX/XXXX

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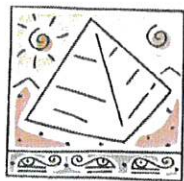
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Western Egyptian Economic
Opportunity Council Inc.

AFFIRMATIVE ACTION PLAN

Section One

INTRODUCTION

Western Egyptian Economic Opportunity Council, Inc.'s Affirmative Action Plan serves as a guide to its equal opportunity program initiatives. The data component sections of the plan demonstrate how well the Agency performed last fiscal year toward meeting its hiring and nondiscrimination objectives. It also provides goals for the current fiscal year towards providing reasonable accommodations to staff and utilizing the talents of minorities, protected class individuals, physically challenged persons and veterans.

The Affirmative Action Plan was developed to satisfy the guidelines of the Illinois Department of Human Rights, as well as, the parameters and mandates of the various federal funding agencies whose programs the Agency administers on a statewide basis.

The goals and objectives stated herein will be actively pursued by the Equal Employment Opportunity Director and management staff to provide maximum accessibility to minorities, protected class individuals, physically challenged persons and veterans in all hiring and upward mobility programs.

EQUAL EMPLOYMENT OPPORTUNITY ~
AFFIRMATIVE ACTION PROGRAM CERTIFICATION

AGENCY: Western Egyptian Economic Opportunity Council Inc.

MAIN ADDRESS: PO Box 7, Steeleville, Illinois 62288

TELEPHONE NUMBER: (618) 965-3458

WESBITE: weeoc.org

CHIEF EXECUTIVE OFFICER: Jennifer S. Maciura

EEO/AA OFFICER: Jennifer S. Maciura

ADA COORDINATOR: Jennifer S. Maciura

This is to certify that the attached document represents the Equal Employment Opportunity ~ Affirmative Action Program of this Agency.

Chief Executive Officer

Dated: 10/23/2025

EEO/ADA Coordinator

Dated: 10/23/2025

STATEMENT OF AFFIRMATIVE ACTION POLICY

It is the policy of Western Egyptian Economic Opportunity Council Inc. to provide equal employment opportunities without regard to race, color, religion, sex, national origin, age, disability, marital status, veteran status, sexual orientation, genetic information of any other protected characteristic under applicable law. The policy related to all phases of employment, including, but not limited to, recruiting, employment, placement, promotion, transfer, demotion, reduction of workforce and terminations, rates of pay or other forms of compensation, selection for training, the use of all facilities, and participation in all Agency-sponsored employee activities. Provisions in applicable laws providing for bona fide occupational qualifications, business necessity or age limitations will be adhered to by the Agency where appropriate.

As part of the Agency's equal opportunity policy, Western Egyptian Economic Opportunity Council Inc. will also take affirmative action as called for by applicable laws and Executive Orders to ensure that minority group individuals, females, disabled veterans, recently separated veterans, other protected veterans, Armed Forces medal veterans and qualified disabled persons are introduced into our workforce and considered for promotional opportunities.

Employees and participants shall not be subjected to harassment, intimidation or any type of retaliation because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal opportunity employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity.

The above-mentioned policies shall be periodically brought to the attention of supervisors and shall be appropriately administered. It is the responsibility of each supervisor of the Agency to ensure affirmative implementation of these policies to avoid any discrimination in employment. All employees are expected to recognize these policies and cooperate with their implantation. Violation of these policies is a disciplinary offense.

The Affirmative Action Officer has been assigned to direct the establishment and monitor the implementation of personnel procedures to guide the Agency's Affirmative Action Program throughout Western Egyptian Economic Opportunity Council, Inc. A notice explaining the Agency's policy will be posted.

AGENCY'S MISSION STATEMENT

Equipping low-income individuals and families with resources needed for stability and self-sufficiency.

AGENCY'S VISION STATEMENT

We envision thriving communities where individuals and families have broken free from the cycle of poverty.

AGENCY'S POLICY STATEMENT

- A. The Agency affirms a policy of equal employment opportunity for all citizens. It further declares and reaffirms full compliance with all provisions of state and federal rules, regulations, ordinances, laws and executive orders covering equal employment opportunity.
- B. The basic philosophy of the Agency's Equal Opportunity, Access of Services and Affirmative Action Program is clear: discrimination based on race, color, sex, sexual orientation, religion, ancestry, military status, political affiliation, national origin, age, marital status, or as a result of a physical or mental disability is against the law.
- C. This policy extends to all activities in programs which are conducted internally and by other agencies, institutions, organizations or political subdivisions where financial assistance is made available by the Agency through contracts or other arrangements using state or federal funds.
- D. To implement this program of equal opportunity, access of services and affirmative action, it must be fully understood by all administrative, managerial and supervisory personnel, all other employees and the communities where the Agency facilities are located.
- E. The policy also provides reasonable accommodations to persons with physical or mental limitations in an effort to fully utilize the talents of persons who can make a contribution toward assisting the Agency accomplish its mission, as well as, provide access of clients to any facility.
- F. The purpose of the Affirmative Action Plan is to immediately proceed in a systematic manner to eliminate any artificial barriers to equal access of services, employment and promotion within the Agency.

- G. Through the policies and programs set forth in this Affirmative Action Plan, the Agency undertakes to comply fully with state and federal laws relating to equal opportunity and nondiscrimination compliance in public service.

EEO/AA CHALLENGES

At this time, Western Egyptian Economic Opportunity Council Inc. does not have any barriers to full implementation of EEO/AA/ADA and extension of service clients.

RESPONSIBILITY FOR EQUAL ACCESS OF SERVICES AND

EMPLOYMENT OPPORTUNITY IMPLEMENTATION

The ultimate responsibility for achieving equal employment opportunity within the Agency is through its Affirmative Action Plan under the law and the principles of sound public administration. The following are the duties of the Equal Employment Opportunity Programs:

1. To develop the Agency's Affirmative Action plan, goals and objectives;
2. To assist in identifying and solving EEO problems;
3. To design and implement internal audits and reporting systems for measuring the effectiveness of Agency programs indicating need for remedial action and determining the degree to which the Agency's goals and objectives have been attained;
4. To assist in the evaluation of employees and clients/applicants so that minorities, women and disabled persons are given equal opportunity and access to services;
5. To provide accommodating services to clients with Limited English Proficiency (LEP) by:
 - a. establishing the policy to ensure that all services and programs offered by the Agency are accessible to individuals who are LEP. Title VI of the Civil Rights Act of 1964 requires that all persons who are non-English or Limited-English-speaking have the same access to services as all other persons. It is the Agency's obligation to offer qualified interpreters in other languages to clients who are non-English or Limited-English-speaking, and to any family member who is non-English or Limited-English-speaking and needs to consult regarding the client's care. The Agency's obligation to provide such language interpreters is not dependent on the client's request for the same. The Agency shall function in a coordinator and supervisory role in relation to special communication services for persons who are LEP. The Agency's staff are trained to recognize and assist LEP clients. The Agency does not currently employ anyone who is bilingual. When a language or communication barrier exists, the Agency will arrange for a qualified translator to be present in all situations where effective communication is necessary. This service will be provided free of charge to the clients. The Agency will utilize federal and state resources to assist LEP individuals, as well as partnering with the following:
 - i. Utilizing Puentes de Esperanza in Fairview Heights, Illinois, hand-held interpretation devices, other Head Start parents and Google Translate when needed for Head Start services such as registration, parent meetings, parent-teacher conferences, home visits with parents, etc.

- ii. Utilizing SIU-C Multi-Cultural Center in Carbondale, Illinois when needed for Client Assistance in other Agency programs, employment assistance, etc.;
6. To ensure that hearing impaired clients receive services by utilizing sign-language interpreters and other auxiliary aide for hearing impaired individuals;
7. At the request of the Agency's Executive Director, to direct Agency staff in taking appropriate action to correct discriminatory practices identified by the Agency and report to the Executive Director on the progress of actions taken; and
8. In conjunction with the filing of quarterly reports, to submit recommendations to the Executive Director and the Agency for improvements to the Agency's Affirmative Action Plan.

Western Egyptian Economic Opportunity Council Inc.
Equal Employment Opportunity Staff
Jennifer S. Maciura ~ EEO/ADA Officer
PO Box 7 – Steeleville, Illinois 62288
jennifer.maciura@weeoc.org

METHODS OF DISSEMINATING THE AFFIRMATIVE ACTION POLICY AND PLAN

INTERNAL

1. The Equal Employment Opportunity Officer will post the Affirmative Action Policy on all Western Egyptian Economic Opportunity Council Inc. bulletin boards and on the website, which is available to all employees and the public.
2. The Agency's Equal Opportunity Staff Liaison will provide a copy of the Affirmative Action Plan to the Grants Manager.
3. All staff, board members and clients will be notified that a copy of the Affirmative Action Plan is available upon request.

EXTERNAL

1. The Equal Employment Opportunity Officer will submit to the Department of Commerce and Economic Opportunity and Office of Community Assistance a copy of the Agency's Affirmative Action Plan via an electronic version, which will be uploaded to the STARS Programmatic Application tool.
2. The Agency's Affirmative Action Plan will be available to all state and federal entities, as well as, all interested recruitment sources.



Western Egyptian Economic
Opportunity Council Inc.

AFFIRMATIVE ACTION PLAN

Section Two

INTERNAL WORKFORCE ANALYSIS

Employment and Professional Services

As of September 1, 2025, Western Egyptian Economic Opportunity Council, Inc. has a total number of 89 employees. The following table is the demographics of the employees employed by the Agency.

Total Labor Force in Area Served = 41,122
 Labor Force in Area Served 20-64* = 23,830

#1 Demographic Groups	#2 Estimated # and % of Persons in Labor Service Area		#3 # and % of Persons Currently Employed by the Agency		#4 # and % Difference (constitutes Agency's AA objective for next year)	
	#	%	#	%	#	%
Sex: Male	20,427	49.7%	10	11.2%	-34	-38.44%
Female	19,180	46.6%	79	88.8%	37	42.12%
Age: 16-19	9,005	21.9%	0	0.0%	-19	-21.90%
20-64	23,830	57.9%	78	87.6%	26	29.69%
65+	8,287	20.2%	11	12.4%	-7	-7.79%
Race: White	38,645	94.0%	84	94.4%	0	0.41%
Black/African American	734	1.8%	1	1.1%	-1	-0.66%
American Indian/Alaskan	35	0.1%	0	0.0%	0	-0.09%
Asian	253	0.6%	1	1.1%	0	0.51%
Native Hawaiian/Other	7	0.0%	1	1.1%	1	1.11%
Other/2 or more races	1,448	3.5%	2	2.2%	-1	-1.27%
Ethnicity: Hispanic or Latino	982	2.4%	0	0.0%	-2	-2.39%
Disabled	6,779	16.5%	5	5.6%	-10	-10.87%

*Census Data for Sex and Disability Status only captures age range 20-64

Analysis: The Agency has an underrepresented male employee count compared to female employees. The chart shows 10 male employees employed with Western Egyptian EOC versus 79 female employees.

Programmatic Goals: Eliminate the underrepresentation of male employees employed by Western Egyptian EOC by hiring more male employees.

Objective: As vacancies occur, the Agency will promote the hiring of male employees by notifying relevant recruitment sources of vacancies for referrals of male applicants and participate in career placement fairs for the purpose of attracting well-qualified male applicants. However, a majority of the positions at Western Egyptian are within the Head Start program and the Nutrition program, which are traditionally viewed as more traditionally female-centric fields in regard to child care and nutrition services. For example, of the 91 employees currently employed by Western Egyptian, there are 48 Head Start employees and 15 Nutrition employees. Of those employees, there are only 3 male Head Start employees, which are 2 Bus Drivers and 1 Father Engagement Advocate, and only 6 male Nutrition employees, which are 5 Van Drivers and 1 Cook Aide.

Volunteers and Board Members

As of September 1, 2025, Western Egyptian Economic Opportunity Council, Inc. has a total number of 9 Board Members. The following table is the demographics of the Board Members for the Agency.

Total Population in Area Served = 80,164

#1 Demographic Groups	#2 Estimated # and % of Persons in Labor Service Area		#3 # and % of Persons Currently Employed by the Agency		#4 # and % Difference (constitutes Agency's AA objective for next year)	
	#	%	#	%	#	%
Sex: Male	40,199	50.1%	4	44.4%	-1	-5.70%
Female	39,965	49.9%	5	55.6%	1	5.70%
Age: 16-19	17,554	21.9%	0	0.0%	-2	-21.90%
20-64	46,455	57.9%	7	77.8%	2	19.83%
65+	16,155	20.2%	2	22.2%	0	2.07%
Race: White	75,335	94.0%	7	77.8%	-1	-16.20%
Black/African American	1,430	1.8%	0	0.0%	0	-1.78%
American Indian/Alaskan	69	0.1%	0	0.0%	0	-0.09%
Asian	493	0.6%	0	0.0%	0	-0.61%
Native Hawaiian/Other	14	0.0%	0	0.0%	0	-0.02%
Other/2 or more races	2,823	3.5%	2	22.2%	2	18.70%
Ethnicity: Hispanic or Latino	1,914	2.4%	1	11.1%	1	8.72%
Disabled	13,215	16.5%	1	11.1%	0	-5.37%

Analysis: The Agency has an underrepresented non-White Board Members in terms of racial group equality. The chart shows there are 7 white Board Members versus 2 non-White Board Member.

Programmatic Goals: Eliminate the underrepresentation of non-White Board Members presented on the Western Egyptian EOC's Board of Directors.

Objective: The Agency continues working on recruiting a more diverse membership on Western Egyptian EOC's Board of Directors. Example, last year the Board of Directors were underrepresented in female Board Members. This year there is only one more male Board Members versus female Board Members. When a Board seat becomes vacant, measures will be taken to contact schools, daycares, colleges, etc. within the Agency's service area with emphasis on recruiting a racially diverse individual who can professionally represent a more diverse racial group verses the overrepresented white Board Members.

Clients

As of September 1, 2025, Western Egyptian Economic Opportunity Council, Inc. has a total number of 8,366 Clients. The following table is the demographics of the clients served by the Agency.

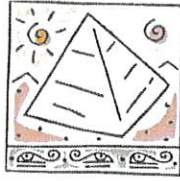
Total Poverty Population in Area Served = 8,024

#1 Demographic Groups	#2 Estimated # and % of Persons in Labor Service Area		#3 # and % of Persons Currently Employed by the Agency		#4 # and % Difference (constitutes Agency's AA objective for next year)	
	#	%	#	%	#	%
Sex: Male	3,870	48.2%	3,432	41.1%	-593	-7.09%
Female	4,154	51.8%	4,911	58.9%	593	7.09%
Age: 16-19	2,472	30.8%	2,908	36.7%	495	5.91%
20-64	4,169	52.0%	4,246	63.6%	139	1.66%
65+	1,383	17.2%	765	9.7%	-634	-7.58%
Race: White	7,031	87.6%	5,165	61.7%	-2,166	-25.89%
Black/African American	466	5.8%	2,560	30.6%	2,074	24.79%
American Indian/Alaskan	0	0.0%	13	0.2%	13	0.16%
Asian	22	0.3%	25	0.3%	2	0.02%
Native Hawaiian/Other	0	0.0%	1	0.0%	1	0.01%
Other/2 or more races	505	6.3%	602	7.2%	75	0.90%
Ethnicity: Hispanic or Latino	544	6.8%	186	2.2%	-381	-4.56%
Disabled	1,323	16.5%	2,016	24.1%	637	7.61%

Analysis: The Agency is underrepresented in one client demographic categories, which is Hispanic clients. The chart shows that Hispanic's are underrepresented by 4.56% compared to Western Egyptian's poverty population in the service area.

Programmatic Goals: Eliminate the underrepresentation of diverse clients within Western Egyptian EOC's service area.

Objective: The Agency will continue concentration of the outreach efforts within the Hispanic communities to improve our client served numbers. The Agency will plan to have outreach events within those communities to share client benefit information to the underrepresented client demographic categories. The Agency will be in contact with area agencies, such as Illinois Department of Human Services, US Department of Health and Human Services, Housing Authorities, ComWell, etc. to provide information about the Agency's client services to those individuals who are Hispanic in efforts to assist in financial burdens.



Western Egyptian Economic
Opportunity Council Inc.

AFFIRMATIVE ACTION PLAN

Section Three

EQUAL EMPLOYMENT OPPORTUNITY COMPLAINT INVESTIGATION PROCEDURE

POLICY

Western Egyptian Economic Opportunity Council Inc. affirms its commitment to a policy of equal employment opportunity through the implementation of an EEO compliant investigation procedure to promote the internal resolution of employee complaints of alleged discrimination. It is the conviction of the Agency that the establishment of this compliant investigation procedure shall provide an internal avenue to redress to informally resolve complaints of alleged discrimination at the lowest organizational level, reducing the backlog, delay and expense of a prolonged formal investigation.

To that end, the EEO Officer and Board of Directors will work in a concerted effort during the investigation of complaints, documentation of facts, the presentation of findings and recommendations to resolve the alleged discriminatory issue(s).

The use of this internal EEO complaint investigation procedure does not preclude the rights of an employee to file a charge directly with the state (Department of Human Rights) or the federal government (Equal Employment Opportunity Commission or any other appropriate government agency). The filing of any complaint of alleged discrimination may not be used as a basis for future retaliation adversely affecting the rights of any employee.

PROCEDURES

The Internal EEO Complaint Form (attached) shall be used to clearly record the date, nature and other pertinent information of the complaint of alleged discrimination submitted to the EEO Officer.

All complaints alleging a violation of the equal opportunity provisions must be filed with the EEO Officer within **10 working days** from the alleged violation.

The EEO Officer will forward the complaint within **5 working days** from the date of receipt of the complaint to the Agency's Board of Directors or designee who will process it and begin an investigation.

Copies of the complaint are kept in a confidential location on file with the Agency's Board of Directors and the EEO Officer. Upon request, the EEO Officer will provide technical assistance to the Board of Directors or designee throughout the investigatory process.

Upon completion of the investigation, the Board of Directors or designee will develop a written report of the investigation findings. The report will be sent to the Executive Director for review. The Board of Directors or designee will prepare and send a finding letter to both parties involved.

The employee also has a right to file a formal charge within **2 years** of the alleged violation with the Illinois Department of Human Rights and/or within **2 years** of the

alleged violation with the U.S. Equal Employment Opportunity Commission concurrently with the filing of an internal complaint.

IDHR administers the State of Illinois Sexual Harassment and Discrimination Helpline: (877) 236-7703 ~ Monday – Friday from 8:30 a.m. to 5:00 p.m.

Addresses of governmental entities which have responsibility for handling various discriminatory complaints follow:

Illinois Department of Human Rights

535 West Jefferson Street, 1st Floor
Springfield, Illinois 62702
(217) 785-5100
TTY (866) 740-3953

Illinois Department of Human Rights

555 West Monroe Street, 7th Floor
Chicago, Illinois 60661
(312) 814-6200
TTY (866) 740-3953

Illinois Department of Human Rights

Marion Regional Office Building
2309 West Main Street, Suite 112
Marion, Illinois 62959
(618) 993-7463

Equal Employment Opportunity Commission

JCK Federal Building
230 South Dearborn Street
Suite 1866 (Enforcement, State and Local & Hearings)
Suite 2920 (Legal & ADR)
Chicago, Illinois 60604
(312) 872-9777
Enforcement/File Disclosure Fax (312) 558-1200
www.eeoc.gov
TTY (800) 669-6820

Equal Employment Opportunity Commission

1222 Spruce Street, Room 8-100
St Louis, Missouri 63103
(800) 669-4000
TTY (800) 669-6820

Western Egyptian Economic Opportunity Council Inc.

Internal EEO Complaint Form

All complaints regarding Equal Employment Opportunity should be filed with the Agency's Equal Employment Opportunity Officer at the following address:

**Jennifer S. Maciura
EEO/ADA Officer
PO Box 7 ~ Steeleville, Illinois 62288
jennifer.maciura@weeoc.org**

1. Name: _____
Telephone: _____
Work Location: _____
Present Job: _____

2. Date of Alleged discriminatory practice or action: _____

3. Basis of the alleged discriminatory practice:

<input type="radio"/> Race	<input type="radio"/> Disability
<input type="radio"/> Sex	<input type="radio"/> Retaliation
<input type="radio"/> Sexual Harassment	<input type="radio"/> Religion
<input type="radio"/> Sexual Orientation	<input type="radio"/> Age
<input type="radio"/> National Origin Ancestry	<input type="radio"/> Other

4. The discrimination occurred in connection with:

<input type="radio"/> Interview	<input type="radio"/> Compensation
<input type="radio"/> Hiring Selection	<input type="radio"/> Transfer
<input type="radio"/> Promotion	<input type="radio"/> Lay Off
<input type="radio"/> Downward Allocation	<input type="radio"/> Termination
<input type="radio"/> Disciplinary Action	<input type="radio"/> Training Opportunity
<input type="radio"/> **Other _____ **Please explain within Section 5 of this form**	

5. The facts of the alleged discriminatory employment practice are (continue of additional sheet, if necessary):

6. Please supply supporting evidence to document the basis for the discriminatory practice you are claiming, as indicated in your response to Section 3 of this form:

I have attached supporting evidence:

<input type="radio"/> Yes	<input type="radio"/> No
---------------------------	--------------------------

Describe: _____

7. Have you made an effort to resolve the discrimination through your supervisors, the grievance procedure or with any public or private organization?

<input type="radio"/> Yes	<input type="radio"/> No
---------------------------	--------------------------

If yes, please explain, indicating the outcome of the efforts: _____

Complainant's Signature

Date Filed

Department's EEO Officer's Signature

Date Received

NOTE: To initiate a formal charge of discrimination, this form must be filed with the Agency's EEO/ADA Officer **within 10 days of the alleged violation.**

Each employee also has the right to file a formal charge **within 2 years of the alleged violation** with the Illinois Department of Human Rights, **2 years** with the Equal Employment Opportunity Commission or **180 days** after alleged unlawful employment practice occurred pertaining to an Equal Pay violation. For Victim's Economic Security and Safety Act of 2003 (VESSA) claims arising after August 25, 2003, complaints may file with the Illinois Department of Labor.

Illinois Department of Human Rights
535 West Jefferson Street, 1st Floor
Springfield, Illinois 62702
www.state.il.us/dhr
Telephone: (217) 785-5125
TTY: (217) 785-5125
TTY: (312)353-2421

Equal Employment Opportunity Commission
JCK Federal Building
230 South Dearborn Street
Suite 1866 (Enforcement, State, Local & Hearings)
Suite 2920 (Legal & ADR)
Chicago, Illinois 60604
Telephone: (312) 872-9777
TTY: (312) 353-2421
Fax: (312) 558-1200
www.eeoc.gov

Illinois Department of Human Rights
555 West Monroe Street, 7th Floor
Chicago, Illinois 60661
Telephone: (312)814-6200
TTY: (312) 263-1579

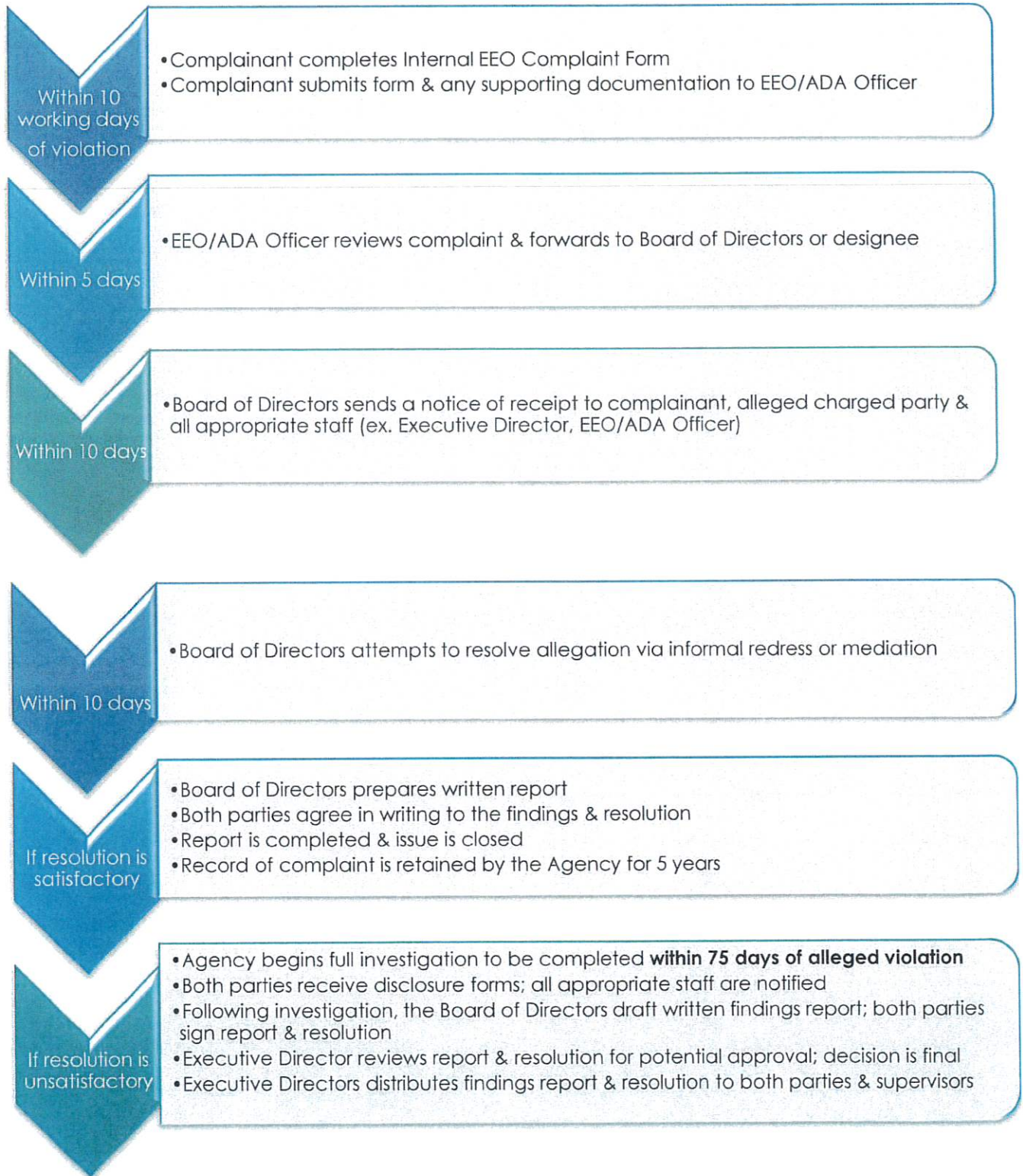
Equal Employment Opportunity Commission
1222 Spruce Street, Room 8-100
St Louis, Missouri 63103
Telephone: (314) 425-6547
TTY: (314)425-6547

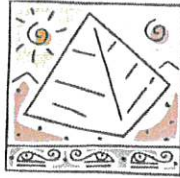
Illinois Department of Human Rights
2309 West Main, Suite 112
Marion, Illinois 62959
Telephone: (618) 993-7461

Illinois Department of Labor
State of Illinois Building
160 North LaSalle Street, Suite C-1300
Chicago, Illinois 60601-3150
Equal Pay Act of 2003
Telephone: (866) 372-4365
Victims' Economic Security & Safety Act of 2003
Telephone: (312) 793-6797

Please return the completed form, with copies of supporting documentation to the Agency's EEO/ADA Officer.

INTERNAL EEO COMPLAINT PROCESS & TIMELINE





Western Egyptian Economic
Opportunity Council Inc.

AFFIRMATIVE ACTION PLAN

Section Four

AMERICANS WITH DISABILITIES ACT POLICY

It is the policy of the Western Egyptian Economic Opportunity Council Inc. to comply with the provisions of the Americans with Disabilities Act 1990, 42 U.S.C.A. Section 12101, et seq ("ADA"), as amended by the ADA of 2008, and the Illinois Human Rights Act. The ADA prohibits discrimination against qualified individuals with disabilities on basis of their disability. The ADA provides, in part, that qualified individuals with disabilities shall not be excluded from participating in or be denied the benefits of any programs, service or activity offered by the Agency.

The ADA requires that all programs, services and activities, when viewed in their entirety, are readily accessible to the usable by qualified individuals with disabilities. The Agency must communicate effectively with individuals with speech, visual and hearing impairments and provide auxiliary communication aides/interpreters to those benefitting from the Agency's employment, programs, services or activities to afford equal opportunity.

The Agency's by-laws have been updated to allow the use of Zoom Meetings to offer Board Members and others an alternate accommodation to participate in Board Meetings and other meetings conducted through the Agency in the event that in-person meeting attendance is not possible.

Individuals wishing to review the ADA or its interpretive regulations, ask questions about their rights and remedies under the ADA, request a reasonable modification to the Agency's policies, practices or procedures, or file a written grievance with the Agency alleging noncompliance with the DA should contact the Agency's designated EEO/ADA Officer.

Jennifer S. Maciura
EEO/ADA Officer
PO Box 7 ~ Steeleville, Illinois 62288
Jennifer.maciura@weeoc.org

LABOR FORCE ANALYSIS FOR PEOPLE WITH DISABILITIES

Agency: Western Egyptian Economic Opportunity Council Inc.

Fiscal Year: 2026

Total Employees: 89

Percent of People with Disabilities in Area Labor Force: 16.5%

Labor Force Number: 41,122

Number of Employees with Disabilities in Agency: 5

Underutilization or Parity: Underutilization

REASONABLE ACCOMMODATION POLICY STATEMENT

In compliance with the U.S. Americans with Disabilities Act (ADA) of 1990, as amended by the Americans with Disabilities Act Amendments Act (ADAAA) of 2008, and the Illinois Human Rights Act, it is the policy of Western Egyptian Economic Opportunity Council Inc. to reasonably accommodate the known physical or mental conditions of otherwise qualified applicants and employees with disabilities.

Western Egyptian Economic Opportunity Council Inc. recognizes the rights of a qualified applicant or employee with a disability to request a reasonable accommodation to ensure equal opportunity in the application process; to enable him or her to perform essential functions of a job; and/or to enable him or her to enjoy equal benefits and privileges of employment.

It is the responsibility of Western Egyptian Economic Opportunity Council Inc. to provide a reasonable accommodation to qualified applicants and employees with disabilities, when such reasonable accommodation does not pose an undue hardship to the operation of the Agency's business.

Western Egyptian Economic Opportunity Council Inc.'s Equal Employment Opportunity Officer and/or the Americans with Disabilities Act Coordinator can provide further information about the Agency's policy in this area.

Executive Director Signature

Date

REASONABLE ACCOMMODATION POLICY

I. INTRODUCTION

The Americans with Disabilities Act of 1990, 42 U.S.C. 12101 et seq. (ADA), as amended by the ADAAA of 2008, prohibits discrimination against a qualified individual with a disability in regard to job application procedures, the hiring, the advancement or discharge of employees; employee compensation; job training; and, other terms, conditions and privileges of employment. [Section 102 (a)]

An employer must make reasonable accommodations to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, unless such covered entity has demonstrated that the accommodation would impose an undue hardship on the operation of the business of such covered entity. [Section 102 (b) (5) (A)] However, each individual is responsible for initiating the request for reasonable accommodation, if such individual believes such accommodation is required to enable him/her to perform the essential functions of the job.

The policy and procedures set forth herein are also intended to meet the requirements of the Illinois Human Rights Act (Ill. Rev. Stat. 1989, ch. 68, para. 1-101 et seq.) and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as well as the ADA, as amended by the ADAAA of 2008.

II. POLICY

In accordance, with the law and regulations, it is the policy of Western Egyptian Economic Opportunity Council Inc. ("the Agency"):

- A. to inform employees and applicants about the Agency's policies and of the right to reasonable accommodations and
- B. to provide any and all such reasonable accommodations in the most cost-effective manner available unless it would impose an "undue hardship."

This policy is intended to comply with the applicable laws and is not intended to create any legal or contractual rights or obligations. For the purpose of this policy, the term "employee" shall include "applicant" and "prospective employee."

III. REASONABLE ACCOMMODATIONS COMMITTEE (RAC)

A. Purpose

The purpose of the RAC is to implement effectively this policy.

B. Membership

The RAC consists of the following staff members:

1. Executive Director
2. Fiscal Officer
3. Head Start Director

C. Duties

The RAC provides technical assistance to the Agency's employees on technology, the ADA Title V of the Rehabilitation Act, accessibility standards and employee relations as it relates to requests or potential requests.

The RAC will maintain documentation regarding RAC requests in order to:

1. provide appropriate budget information and projected cost analysis for future budget cycles to the Fiscal Department;
2. lend consistency to the system of the provision of accommodation and ensure nondiscrimination in the treatment of employees;
3. ensure that requests are processed, approved and accommodations provided in a timely manner;
4. provide reports to employee accommodations and costs to regulatory agencies.

As necessary, the RAC shall provide periodic reports, including the above documentation, to the Executive Director for information/action. All reports shall be developed in a manner which protects the confidentiality of the employee.

IV. REASONABLE ACCOMMODATION

- A. A reasonable accommodation is a modification or adjustment to a job application process and/or the work environment that enables qualified applicants or employees to be considered for a position, to perform the essential functions of a position and to enjoy equal benefits and privileges of employment. ADA regulations: 29 C.F.R. 1630.2(o) (1)
- B. Reasonable Accommodation may include, but is not limited to:
 1. making existing facilities used by employees readily accessible to and useable by individuals with disabilities;
 2. job restructuring; part-time or modified work schedules; reassignment to a vacant position; acquisition or modification of equipment or devices; appropriate adjustment or modification of examinations, training materials

or policies; the provision of qualified readers or interpreters; and, other similar accommodations for individuals with disabilities. Section 101(9) of the ADA.

The determination of which accommodation is appropriate in a particular situation will be made on a case by case basis and involve the employer and employee in a flexible, interactive process whereby the employee identifies the precise limitations imposed by the disability and along with the employer explores potential accommodations that would overcome those limitations.

NOTE: The ADA permits employers to choose the accommodation which is lowest in cost if such accommodation provides a similar result to a costlier accommodation.

C. Reasonable accommodations may be categorized in the following manner:

1. restructuring/modifications accommodation, including, but not limited to job restructuring by removal of non-essential tasks, job modifications, rearrangement of office furniture, removal of desk drawers, flexible time to allow for transportation and/or medical schedules;
2. technological/accessibility accommodations, including, but not limited to dictating machines, voice activated equipment, Telecommunication Device for the Deaf (TDDs), hand controls for dictating devices, speaker-phones, telephone amplifiers, teletypewriters (TTYs), Braille typewriters, orthopedic desk chairs and other adaptive office furniture, looping systems, etc., as well as architectural modification. In recent year, digital technology has evolved rapidly and is making the TTY obsolete. To find out more about these new devices and services, please contact the Illinois Deaf and Hard of Hearing Commission, 1630 South 6th Street, Springfield, Illinois 62703 or (217) 557-4495;
3. assistive care accommodations including utilization of additional persons, such as readers, drivers, interpreters and attendants who specifically assist an individual in performing the essential duties of the job.

NOTE: A reasonable accommodation pertains only to the employee and does not include family members. Some types of accommodations need not be on an individual basis if available at the work site and if used by two or more individuals will not impede job performance.

V. UNDUE HARDSHIP

- A. "Undue Hardship" means significant difficulty of expense in, or resulting from, the provision of an accommodations. It refers to any accommodation that would be unduly costly, extensive, substantial or disruptive, or that would fundamentally alter the nature or operation of the business of the Agency.
- B. Whether an accommodation will impose an undue hardship must be analyzed on a case by case basis. Factors to be considered in determining whether an accommodation would impose an undue hardship on the Agency may include, but not limited to: (1) the nature and net cost of the accommodation needed; (2) the overall appropriations of the facility or facilities involved in the provision of the reasonable accommodation, the number of person employed at such facility and the effect on expenses and resources; (3) the overall appropriation of the Agency with respect to the number of employees and the number, type and location of its facilities; (4) the type of operation or operations of the Agency, including the composition, structure and functions of the workplace of such agency, and the geographic separations and administrative or fiscal relationship of the facility or facilities in question to the Agency; and (5) the impact of the accommodation upon the operation of the facility, including the impact on the ability of other employees to be able to perform their duties and the impact of the facility's ability to conduct business.
- C. A requested accommodation may be denied if it is unduly disruptive to other employees or to the functioning of the business of the Agency. To demonstrate the accommodation may be denied if it is unduly disruptive, the disruption must result from the provision of the accommodation, not from the fears or prejudices of other employees toward the individual's disability. The terms of a collective bargaining agreement may be relevant.

VI. PROCEDURES FOR PROCESSING REQUESTS FOR REASONABLE ACCOMMODATIONS

- A. The determination of reasonable accommodations for qualified employees who require such to overcome a physical or mental impairment in performance of job duties must be conducted at the request and with the consultation of the employee.
 - 1. A person with a disability may be qualified for a position vacancy if the person satisfies the requisite skills, experience, education and other job-related requirements of the employment position, as set forth in standardized Department of Central Management Services requirements, and with or without reasonable accommodations can perform the essential functions of the job.
 - 2. Essential job functions vary with individual job descriptions and would include those physical, mental and inter-personal activities necessary to achieve the anticipated job performance effectively.

3. A determination as to a reasonable accommodation for one person will not be treated as a precedent for another person.
- B. The employee must request any and all reasonable accommodations on a Request for Reasonable Accommodation Form. The employee is responsible for adequately responding to all questions applicable on the form. Once completed, the form shall be transmitted by the employee to the immediate supervisor, or by the prospective employee to the interviewing supervisor. The employee should retain a copy of the request form.
1. If requested by management, the employee shall submit medical documentation to support the need for the accommodation. When additional information becomes available, the employee should submit it in writing to the immediate supervisor for transmittal to the RAC.
 2. Technical assistance is available to the employee and supervisor(s) from the Agency upon request.
- C. The immediate supervisor or interviewing supervisor shall make a recommendation regarding the request **within five (5) working days** of receipt and forward the request to the Executive Director who shall **have five (5) working days** to review and provide a recommendation on the request form.
- D. The Executive Director shall forward the request to the RAC for review.
- E. Unless the appropriate reasonable accommodation is obvious to either or both the Agency and the qualified individual with a disability, all reviewers and the RAC will use a problem-solving approach.
1. Analyze the job involved and determine its purpose and essential functions.
 2. Consult with the individual with a disability to ascertain the precise job-related limitations imposed by the individual's disability and how those limitations could be overcome with a reasonable accommodation.
 3. In consultation with the individual to be accommodated, identify potential accommodations and assess the effectiveness each would have in enabling the individual to perform the essential functions of the position.
 4. Consider the preference of the individual to be accommodated and select and implement the accommodation that is most appropriate for both the employee and the Agency.
- F. All reviewers shall consider the request based on the following criteria: (1) the relationship between the accommodation and the essential job functions, (2)

necessity, (3) cost effectiveness, (4) undue hardship to the Agency, and (5) compatibility with existing equipment (where applicable).

- G. **Within ten (10) working days**, the RAC will act upon the request and report accommodations to the Executive Director. If further information is required to make a recommendation, the employee shall be give **thirty (30) days** to provide such documentation and the required **ten (10) working day(s)** time period shall begin when the additional information is received.
- H. The Executive Director will make the final decision **within five (5) working days** of receipt. A copy of the Executive Director's decision and the RAC's recommendation will be returned by the EEO/ADA Officer to the appropriate supervisor who will coordinate implementing the approved request with appropriate staff. A copy of the Executive Director's decision and the RAC's recommendation will also be sent to the employee by RAC **within five (5) working days** of receipt of the Executive Director's decision.
- I. The time limits provided in the section may be extended up to **thirty (30) days** if circumstances warrant (ex. absence of a person needed to make determination, additional information required, etc.).

VII. RECONSIDERATION

If the employee wishes to ask the Executive Director to reconsider a decision on a Reasonable Accommodation Request, the request shall be addressed to the Executive Director **within ten (10) working days** of notification of the decision. The request shall include the reasons for the request and, if appropriate, alternative suggestions for reasonable accommodations. A decision shall be made, and the employee notified **within ten (10) working days** of receipt of the request. The decision constitutes the final administrative action of the Agency on the request.

An employee who has been denied accommodation has the right to file a complaint at the state level with the Illinois Department of Human Rights **within 180 days** of the denial of the request. An employee may also have the right to file a complaint with the U.S. Equal Employment Opportunity Commission.

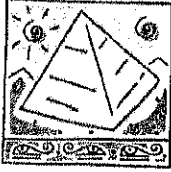
VIII. IMPLEMENTATION

- A. When implementing the approved request, the appropriate supervisor shall provide the following:
 - 1. If the requested accommodation is within the restructuring or modification category, the job will be modified/ restructured. When the supervisor, manager and employee are all in agreement, the supervisor shall provide the accommodation; or,

2. If the requested accommodation is of technological/accessibility or assistive care nature, the appropriate supervisor will coordinate purchase of equipment or devices, or initiate contracts.

B. Expenditure Procedures

1. In carrying out its expenditure obligation responsibilities, the Fiscal Officer relies on the Agency's supervisors to obtain all required approvals before making a commitment for expenditure of Agency funds, to ensure that all purchases are consistent with the State of Illinois and the Agency's procurement policies and procedures, and to initiate steps required to encumber the funds.
2. As part of the process for purchasing goods or services using Agency funds, supervisors are required to initiate a purchase order to commit the funds within the Agency's accounting system. Depending on the type of purchase, the business unit is also required to produce and approve an expenditure authorization document such as:
 - ❖ Contract Obligation
 - ❖ Date Processing Contract Obligations
 - ❖ Purchase Requisitions
3. In general, goods under \$10,000 and professional services not exceeding \$5,000 are procured on a Purchase Order Request; any purchase exceeding those thresholds must be procured on a contract.
4. All expenditure authorization documents or contracts regarding reasonable accommodation requests should clearly reflect within the document that it is in fact a "reasonable accommodation" purchase.



Western Egyptian Economic Opportunity Council Inc.
Reasonable Accommodation Request for Employees

Pursuant to the requirements of state and federal laws, a qualified individual with a disability has the right to request reasonable accommodation in conjunction with his/her employment. Reasonable accommodation means a modification to application procedure, access to the work site and adjustment to the work process or work schedule that would enable a person with a disability to perform a job. Employers are not required to provide accommodations that would impose undue hardship on the operations of their programs. The procedures for accommodation request appear to the back of this form. Completed accommodation request forms should be submitted to the immediate supervisor, with a copy of the Agency's EEO/AA Officer and the Executive Director. The Agency's EEO/AA Officer or Executive Director can respond to questions about the accommodation process.

Name	Job Title	Program	Telephone #
Functional Limitations			

SPECIFY TYPE OF ACCOMMODATION NEEDED AND PROVIDE A DETAILED DESCRIPTION OF THE ITEM REQUESTED – PLEASE BE SPECIFIC

- Purchase or modification of equipment or devices _____

- Job restructuring or task modification _____

- Provision of reader, sign language interpreter or personal assistant _____

- Structural modification to work site or facility _____

- Modification of work schedule or leave policy _____

- Modification of examinations, training materials or personal assistant _____

- Reassignment to vacant position _____

- Other _____

Narrative Explanation

Describe how your functional limitations interferes with performance of a duty or participation in an activity sponsored by Western Egyptian Economic Opportunity Council Inc. Explain how the requested accommodation would be used to enhance job performance or would allow you to participate in an employer-sponsored activity. (Use additional sheets if necessary)

Employee's Signature	Date
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RAC Recommendation

<input type="checkbox"/> Grant	<input type="checkbox"/> Deny	<input type="checkbox"/> Date for Return _____
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(RAC's initials _____)

Executive Director's Final Action

<input type="checkbox"/> Grant	<input type="checkbox"/> Deny	<input type="checkbox"/> Date for Return _____
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(ED's initials _____)

Remarks _____

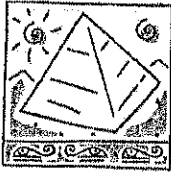
ACCOMMODATION REQUEST PROCEDURES FOR EMPLOYEES

The following procedures should be followed in processing accommodation requests from employees. The Agency's EEO/AA Officer and/or the Executive Director can provide guidance on the accommodation process.

1. The employee shall submit a completed reasonable accommodation request form to his/her immediate supervisor and give a copy of the form to the Agency's EEO/AA Officer and/or the Executive Director. The employee should retain a copy of this information in his/her files.
2. Once received, the supervisor shall review the request form for completeness and, in consultation with the EEO/AA Officer and/or the Executive Director, determine whether medical documentation is needed to either establish the presence of a disability or determine an appropriate accommodation. If documentation is needed, the Agency should narrowly tailor its request to the issues of whether the employee has a disability under the law and how he/she can be accommodated. The employee should be asked to complete a medical release form (also narrowly tailored), if the Agency has additional questions upon review of the medical documentation. When necessary, the employee should be asked to provide documentation to address the issues.
3. Upon receipt of necessary documentation, the supervisor shall make a recommendation, in writing, to the EEO/AA Officer **within five (5) working days**.
4. The EEO/AA Officer shall review the supervisor's recommendation and make a recommendation to the Reasonable Accommodation Committee (RAC) **within five (5) working days** of receipt of the supervisor's recommendation. The EEO/AA Officer shall forward his/her recommendation along with the original reasonable accommodation request form and all documentation to the Agency's Executive Director.
5. The Executive Director shall convene a meeting of the Reasonable Accommodation Committee (RAC) **within ten (10) working days** of receipt of the Executive Director's recommendation. The RAC shall review the accommodation request. Once the Committee's review is complete, the Committee's recommendation shall be submitted to the Executive Director **within five (5) working days** of the Committee's review for the Executive Director's approval or denial.
6. The Executive Director shall review the RAC's recommendation and shall render a decision of denial or approval **within five (5) working days** of receipt from the RAC.
7. Provided the appropriate documentation has been submitted, the EEO/AA Officer shall inform the employee in writing of the Agency's decision to grant or deny the request **within thirty (30) working days** of receipt of the completed request form and any necessary medical documentation. A copy of the response will also be sent to the supervisor.
8. If the Executive Director approves the accommodation request, the Agency shall take appropriate action to comply with the accommodation request. Approved accommodation request shall be implemented as soon as possible. Please note that the Agency may offer alternative suggestions providing an equally effective accommodation to remove the workplace barrier in question.
9. Reconsideration: If an employee wishes to ask the Executive Director to reconsider a decision on a reasonable accommodation request, a written request shall be addressed to

the Executive Director **within ten (10) working days** of notification of the decision. The reconsideration request shall include the reasons that a reconsideration is being requested and, if appropriate, alternative suggestions for reasonable accommodation. After a complete review of the matter, a decision shall be made, and the employee shall be notified. The Executive Director's decision on this recommendation shall constitute the final internal action by the Agency on the accommodation request.

10. An employee who has been denied accommodation has the right to file a complaint at the state level with the Illinois Department of Human Rights **within 300 days** of the denial of the request. An employee may also have the right to file a complaint with the U.S. Equal Employment Opportunity Commission (EEOC) **within 300 days**.
11. The EEO/AA Officer shall document any action taken on a reasonable accommodation request where indicated on the request form and shall retain completed accommodation request forms one year following final action in the matter.



Western Egyptian Economic Opportunity Council Inc.

Reasonable Accommodation Request for Applicants

Pursuant to the requirements of state and federal laws, a qualified individual with a disability has the right to request reasonable accommodation in conjunction with his/her employment. Reasonable accommodation means a modification to application procedure, access to the work site and adjustment to the work process or work schedule that would enable a person with a disability to perform a particular job. Employers are not required to provide accommodation that would impose undue hardship on the operations of their programs. The procedures for accommodation request appear on the back of this form. Completed accommodation request forms should be submitted to the interviewing supervisor. The Agency's EEO/AA Officer or Executive Director can respond to questions about the accommodation process.

Name:	Interviewing Program:
Home Address:	
Telephone:	Functional Limitations:

Type of Accommodation Needed

- Sign Language Interpreter for the Employment Interview
- Reader Service
- Accessible Interviewing Site
- Re-formatting of Examinations for Learning Disabled Applicant
- Examinations Markers for Applicants with Limited Manual Dexterity
- Other (indicate type of accommodation needed): _____

Narrative Explanation

Describe how your functional limitations interferes with a portion of the pre-employment process, ex., applying, testing or interviewing. Explain how the requested accommodation would be used to enable you to complete the application process. (Use additional sheet if necessary)

Applicant's Signature:	Date:
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Agency Action

Interviewing Supervisor's Determination: Grant Deny

Remarks (If denied, provide explanation) _____

Final Agency Approval

Signature:	Date:
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ACCOMMODATION REQUEST PROCEDURES FOR APPLICANTS

Qualified applicants and employees with disabilities have the right to request reasonable accommodation under the law. Applicants may request accommodations to any stage of the application process, including the employment application, examination procedure or interviewing process. Note that Western Egyptian Economic Opportunity Council Inc. is responsible for accommodation to its testing procedures.

Once an individual with a disability has been hired, he/she has the right to request accommodation to the work site, work schedule or work process that would enable him/her to perform the job in question. Procedures for applicants to follow in making an accommodation request are listed below. The EEO/AA Officer can provide additional information about the accommodation process with their agencies.

Procedures:

1. Applicants may request accommodations to the application process orally or in writing (either through correspondence or the use of the accommodation request form for applicants). If the request is made orally or through written correspondence, the Agency's EEO/AA Officer will complete accommodation request forms in the matter for purposes of processing and documenting the request.
2. Applicants shall submit accommodation request to the interviewing supervisor. The interviewing supervisor should provide a copy of the form to the EEO/AA Officer. In cases where the EEO/AA Office completes the form for the applicant with a disability, the EEO/AA Officer shall submit completed forms to the interviewing supervisor and retain a copy for him/herself.
3. A response to the request will be provided to the applicant **within five (5) days** following receipt of the request by the interviewing supervisor.
4. If it is within the bounds of the authority of the interviewing supervisor to grant the request and he/she believes it to be reasonable, the accommodation will be provided. Information regarding the type of accommodation provided will be sent to the EEO/AA Officer.
5. If another employee within the Agency must be consulted for the accommodation to be provided, he/she will determine whether the Agency will grant the request.
6. If the Agency denies the request, the applicant has the right to file an internal complaint with EEO/AA Officer and/or external complaint with the Illinois Department of Human Rights **within 300 days** of the denial. An applicant may also have the right to file a complaint with the U.S. Equal Employment Opportunity Commission (EEOC) **within 300 days**.

PHYSICAL BARRIERS

Western Egyptian Economic Opportunity Council Inc. rents space in several locations with all building meeting the minimum ADA requirements. Locations:

- #1 Industrial Park ~ Steeleville, Illinois 62288
- 342A North Street ~ Murphysboro, Illinois 62966
- 207 West 4th Street ~ Waterloo, Illinois 62298
- 317 South Washington Street ~ DuQuoin Illinois 62832
- 1820 North Market Street ~ Sparta, Illinois 62288
- 316 East Grant ~ Coulterville, Illinois 62237
- 607 West Pine Street ~ Percy, Illinois 62272
- 3747 Hitt Road ~ Tamaroa, Illinois 62888
- 903 South Main ~ Pinckneyville, Illinois 62274

PROCEDURAL BARRIERS

A. Pre-Employment Screening

The ADA prohibits an employer from making any pre-employment inquiries regarding an applicant's physical or mental disability.

According to the ADA, employers may ask about an applicant's ability to perform both essential and marginal job functions. However, employers may not refuse to hire an applicant with a disability because the applicant's disability prevents him/her from performing marginal functions.

Permissible Inquiries

- ✓ Employers may describe or demonstrate the job function and ask if the applicant can perform that function with or without reasonable accommodation.
- ✓ Employers may ask whether the applicant has a driver's license, if driving is a job function, but may not ask whether the applicant has a visual disability.
- ✓ Employer may also ask an applicant (including one with a known disability) to describe or demonstrate how, with or without reasonable accommodation, the applicant will be able to perform job-related functions. Generally, this must be asked of all applicants.
- ✓ If an applicant has a known disability that may interfere with the performance of a job-related function, they can ask only that applicant.

Impermissible Inquiries

- ✓ Employers may not use an application form that lists potentially disabling impairments and ask the applicant to check any of the which he/she may have.
- ✓ Employers may not ask how often individuals will require leave for treatment or use leave as a result of incapacitation because of their disability.
- ✓ Employers may not ask about an applicant's prior workers' compensation history.

- ✓ Employers may not ask if an individual has any disabilities or impairments which may affect their performance on the job.
- ✓ Employers may not ask information about the type of medication an individual is taking.

B. Pre-Employment Testing

The Agency does not conduct pre-employment testing.

C. Employment Criteria and Job Description Review

Any employment criteria established by the Agency to screen applicants should be reviewed before positions are filled to determine whether they would screen out applicants with disabilities. Employment criteria with a disparate impact on applicants with disabilities should be examined to determine whether they are job-related. If such criteria are not job-related, they should be eliminated. Job descriptions are reviewed before interviews are held to identify essential job duties.

D. Identification of Disabled Employees for Layoff Report

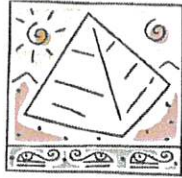
For purposes of preparing an Agency layoff report, disabled employees identified through the Survey for Disabled Employees. Employees who identify impairments on this form are to be considered disabled, and those who do not indicate any impairment are not considered disabled. The survey form contains a notice to this effect. Employees have the right to complete new survey forms at any time during their employment, should their disability status change.

E. Identification of an ADA Officer

Jennifer S. Maciura
EEO/ADA Officer
PO Box 7 ~ Steeleville, Illinois 62288
jennifer.maciura@weeoc.org

EMERGENCY EVACUATION PROCEDURES

The EEO/ADA Officer provides emergency evacuation procedures periodically to employees with disabilities. The Agency's Employee Policy Manual also details emergency procedures. The EEO/ADA Officer will monitor and ask employees if there is a need of assistance during a workplace emergency evacuation. Such information will also be forwarded, in a confidential manner, to safety personnel.



Western Egyptian Economic
Opportunity Council Inc.

AFFIRMATIVE ACTION PLAN

Section Five

EEO LAWS

The federal and state civil rights law, rules, regulations, executive orders that impact Western Egyptian Economic Opportunity Council Inc. are identified below. Where there is a discrepancy between federal, state or local law, federal law supersedes the latter town, unless state or local law is more stringent.

Federal Laws:

The Civil Rights Act of 1964, as amended: This Act is the most comprehensive statute on Civil Rights ever enacted in the U.S. It bans discrimination in voting rights, public accommodations, public education and federally assisted programs. Additionally, it is unlawful under the Act to retaliate against a person who has openly opposed an employer's discriminatory practices or who has filed a charge or assisted in an investigation of a charge.

The Equal Employment Opportunity Act of 1972 is an amendment to the Civil Rights Act of 1964 to extend the Equal Employment Opportunity Commission's jurisdiction to include public employers with 25 or more employees, as well as, private employers with 15 or more employees. This amendment adds sex and religion to the Title VII portion and extends Equal Employment Opportunity to state, local and municipal organizations, all employment agencies (private and public) and to labor organizations.

The Pregnancy Discrimination Act of 1978 amends Title VII of the Civil Right Act to prohibit sex discrimination based on pregnancy. It required that women who were temporarily disabled due to pregnancy, childbirth and related medical conditions be provided the same benefits as those provided other disable workers.

The Civil Rights Act of 1991 expanded the protections afforded individuals under the Civil Rights Act of 1964. It protects against and deters unlawful discrimination and harassment in employment.

Title I of the Civil Rights Act of 1968 provides for criminal penalties for interference with an individual's employment rights due to his/her race, color, religion or national origin.

Title IX of the Education Amendments of 1972, as amended, prohibits discrimination on the basis of sex in all education programs or activities receiving federal financial assistance.

The Age Discrimination In Employment Act of 1967, as amended, prohibits arbitrary discrimination against persons 40 years of age or older.

The Age Discrimination Act of 1975 prohibits unreasonable discrimination on the basis of age in programs or activities receiving Federal financial assistance, including program or activities receiving funds under the State and Local Financial Assistance Act of 1972.

The Rehabilitation Act of 1973 prohibits discrimination against people with physical and mental disabilities except where the disability would prevent them from performing the major duties of the job. It also provides for affirmative action in the employment and advancement of qualified disabled people. Section 503 requires federal contractors and their subcontractors to undertake affirmative action in the employment of qualified disabled individuals. Section 504 requires recipients of federal financial assistance to provide equal employment opportunity and equal service access to qualified disabled individuals. Executive Order 12250 requires each federal agency granting funds to issue Section 504 regulations and authorized the Justice Department to coordinate Section 504 implementation. Section 504 is enforced by the Agency providing the federal funds in question. The Rehabilitation Act requires employers to "make reasonable accommodations to the physical and mental limitations" of employees and applicants who may be disabled. This obligation includes both alterations in physical facilities and modifications in the structure or scheduling of a job.

Title I of the Americans with Disabilities Act of 1990, as amended by the Americans with Disabilities Amendments Act of 2008, prohibits discrimination in employment against individuals with disabilities and establishes the standards governing an employer's affirmative duty to accommodate an individual with a disability. **Title II of the ADA** prohibits discrimination against individuals with disabilities by state and local governments. The ADA Amendments Act of 2008 broadens the coverage of "disability" and thereby brings more individuals under the protection of the law. EEOC issued new regulations under this Act.

The Vietnam Era Veterans Readjustment Act of 1974 requires employers to provide equal opportunity to Vietnam veterans and to disabled veterans of any war and to take affirmative action to ensure such opportunities.

The Equal Pay Act of 1963, as amended, provides that an employer may not discriminate on the basis of sex by paying employees different wages for doing equal work on jobs requiring equal skills, effort and responsibility, and which are performed under similar working conditions in the same establishment. The Act also prohibits reducing any employee's wage in order to come into compliance with the Act.

In general, any employee who is covered by the minimum wage provisions of the Fair Labor Standards Act (FLSA) is protected by this Act. In addition, the Act was amended in 1972 to include some employees not covered by the FLSA, such as executives, administrators, professionals, etc. Violation of this law, if determined to be intentional, can result in back pay. The award covering a period which begins three years prior to the date of the filing and ends when the award is made.

Under the law, employers may have differences in wage rates based on: (1) a seniority system; (2) a merit system; (3) a system which measures earnings by quantity or quality of production, ex. piece rate; and (4) any other bona fide differential.

The Intergovernmental Personnel Act of 1970 ensures the fair treatment of applicants and employees in all aspects of personnel administration without regard to political affiliation, race, color, national origin, sex or religious creed and with proper regard for

the privacy and constitutional rights as citizens. The United State Civil Service Commission (USCSC) administers the Act. USCSC may recommend remedial action, including the termination of grants to states and local governments after they have been given reasonable notice and an opportunity for a hearing, if the program fails to comply with the provision of the Act. However, actual enforcement authority rests with the grantor agency.

The Family and Medical Leave Act (FMLA) requires employers to provide up to 12 weeks of unpaid job-protected leave to "eligible" employees for certain family and medical reasons. Employees are eligible if they have worked for a covered employer for at least one year, and for 1,250 hours during the year preceding the start of the leave and be employed at a worksite where the employer employs at least 50 employees within a 75-mile radius.

Section 585(a) of the National Defense Authorization Act (NDAA) amended the FMLA to provide eligible employees working for covered employers have leave rights related to military service.

Section 3 of the Housing and Urban Development Act of 1968, as amended, provides that opportunities for training and employment funded by Community Development Block Grant program be given to lower income residents within the same location of the project. Also, contracts will be awarded to business concerns located within the same project area.

Section 109 of the Housing and Urban Development Act of 1974, as amended, provides that no person shall be excluded from participation, denied program benefits, or subjected to discrimination under any program or activity funded in whole or in part with funds made available under this title.

The Uniformed Services Employment and Reemployment Rights Act (USERRA) protects the job rights of individuals who voluntarily or involuntarily leave employment positions to undertake military service.

The Genetic Information Nondiscrimination Act of 2008 makes it illegal to discriminate against employees or applicants because of genetic information.

Executive Orders:

Executive Order 11063 provides that no person shall, on basis of race, color, creed or national origin, be discriminated against in the provisions, rehabilitation or benefits of housing financed through Federal financial assistance.

Executive Order 11141 declares it a policy of the Executive Branch that government contractors not discriminate on the basis of age.

Executive Order 11246 requires governmental contractors to have written Affirmative Action Plans and to set goals and timetables for increasing the representation of women and minorities in their workplace if they have been underutilized in the past.