

**OKLAHOMA ACCOUNTANCY BOARD**  
**EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION PLAN**  
**September 1, 2009**

**1.1 Policy Statements**

**1.1.1. Policy Statement on Equal Employment Opportunity/Affirmative Action**

Consistent with federal and state laws and guidelines established for equal employment opportunity and affirmative action, I would like to affirm my continuing policy to provide equal employment and advancement opportunity in all job classifications of this agency without regard to race, color, religion, sex, national origin, age, political affiliation or opinion, or disability so long as the disability does not render the person unable to do the work for which employed.

The principles of equal employment opportunity apply to all employment practices and personnel actions throughout the agency, including recruiting, hiring, promotions, demotions, separations, training, transfers, layoffs (RIF), recall, compensation, benefits and all other terms and conditions of employment. I want to remind each employee that all personnel actions as well as all decisions relating to employment practices are to be made in accordance with the spirit of equal employment opportunity for all.

We have developed an affirmative action plan to help us achieve our goal of equal employment opportunity for all. **Nicole Prieto Johns**, located in Oklahoma City, Oklahoma, telephone number (405) 522-4464, e-mail address nprietojohns@aob.ok.gov, has been delegated the responsibility of implementing the plan, including monitoring and evaluating our progress and reporting the results to me.

In addition, Nicole Prieto Johns is assigned to serve as the Affirmative Action/Equal Employment Opportunity Officer for this agency. He/she or a member of his/her staff is available to any employee having questions or needing assistance in regards to affirmative action or equal employment opportunity in this agency.

My personal commitment to this policy is complete. I accept overall responsibility for equal employment opportunity and affirmative action within this agency. I expect each and every employee to perform his/her duties and responsibilities in a manner that will demonstrate this agency's firm commitment in this most important area.



Edith Steele, Executive Director

### 1.1.2. Policy Statement Against Sexual Harassment

It is the policy of the Oklahoma Accountancy Board not to discriminate in any of its employment practices on the basis of race, color, religion, sex, national origin, age, marital status, political affiliation or opinion, or disability so long as the disability does not render the employee unable to do the work for which employed. Any form of unlawful discrimination to which this policy applies is a very serious matter and will not be tolerated.

Sexual harassment is a form of unlawful discrimination based on sex. In some circumstances, it may violate other laws (for example, criminal assault). Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. Conduct prohibited by this policy includes, but is not limited to:

- Unwelcome sexual flirtation;
- Advances or propositions for sexual activity;
- Continued or repeated verbal abuse of a sexual nature, such as suggestive comments and sexually explicit jokes;
- Sexually degrading language to describe an individual;
- Remarks of a sexual nature to describe a person's body or clothing;
- Display of sexually demeaning objects and pictures;
- Offensive physical contact, such as unwelcome touching, pinching, or brushing the body;
- Coerced sexual intercourse; and
- Sexual assault.

Such conduct is unlawful discrimination based on sex when submission to such conduct is explicitly or implicitly a requirement of the individual's employment, or used as a basis for any employment-related decision concerning that individual, or when such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creates an intimidating, hostile or offensive work environment.

Sexual harassment will not be condoned. Employees are absolutely prohibited from engaging in sexual harassing behavior. Furthermore, any supervisory employee, employee with authority for personnel matters, or other agent or officer of this agency who knows or should have known that an employee of this agency is being subjected to sexual harassment must either take immediate corrective action or report the facts to an Assistant Administrator or to me.

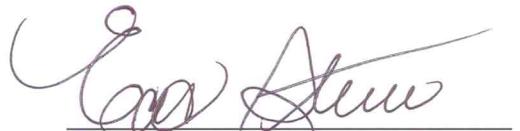
*All employees have a duty to immediately report sexual harassment to a supervisor, an Assistant Administrator, or directly to me.*

Appropriate disciplinary measures will be taken against any employee who causes, engages in, encourages, condones or otherwise permits unlawful sexual harassment, as well as supervisory or other responsible employees who fail to take corrective action

as provided above. Such conduct may be grounds for disciplinary action, up to and including termination of employment.

Any employee who believes that he or she has been the victim of sexual harassment may complain of discrimination based on sex in accordance with this agency's grievance procedure or the complaint may be filed directly with me. Any employee attempting to penalize or retaliate against another employee for filing a complaint, reporting an incident of sexual harassment, or cooperating with an investigation of alleged sexual harassment, shall be subject to disciplinary action, up to and including termination of employment.

It is the responsibility of all employees in this agency, supervisory and non-supervisory, to adhere to this policy and to use all reasonable efforts to further its goals and spirit.



Edith Steele, Executive Director

## **1.2 Responsibility for Affirmative Action and Equal Employment Opportunity**

Edith Steele, Executive Director, has personal overall responsibility for equal employment opportunity and affirmative action within the OAB. Ms. Steele is responsible for appointing an Affirmative Action/Equal Employment Opportunity (AA/EEO) Liaison for the agency. Nicole Prieto Johns has been assigned to be the AA/EEO Liaison for the agency.

### **1.2.1. EEO/AA Officers' Responsibility**

The AA/EEO Liaison is responsible for the implementation and monitoring of the agency's AA/EEO program. The specific responsibilities of the AA/EEO Liaison include:

- A. Developing affirmative action programs, plans, policy statements, and internal communications.
- B. Assisting in the identification of problem areas and effective solutions to problems.
- C. Designing and implementing audit and reporting systems to:
  1. Measure the effectiveness of the agency's program.
  2. Indicate remedial action needed to correct deficiencies.
  3. Determine the degree to which the agency's goals and objectives have been attained.
- D. Serving as liaison between the agency and the various state and federal compliance agencies.
- E. Serving as the agency's outreach and referral resource for minority organizations, women's organizations, organizations for disabled and older persons, and community action groups concerned with employment opportunities for minorities, women, disabled and older persons.
- F. Investigating cases and drafting recommendations for resolution of discrimination complaints.
- G. Keeping the agency's various organizational levels informed of developments in the EEO area.
- H. Inspecting the agency's various worksites to ensure that EEO information is being disseminated and prominently displayed when appropriate.
- I. Monitoring the agency's personnel practices to ensure no discriminatory practices exist.

### **1.2.2. Line Managers/Supervisors**

The responsibilities of management staff members include:

- A. Assisting in the identification of problem areas and establishment of unit goals and objectives.
- B. Monitoring training programs and hiring and promotion patterns to eliminate any impediments to goal attainment.

- C. Conducting career counseling with employees, with special attention given to minorities, women, disabled persons and older workers to ensure they have full access to opportunities for career progression (i.e., transfers, promotions, training, etc.).
- D. Active involvement with organizations that work with or on the behalf of minorities, women, disabled and older persons, as well as community-based agencies and leaders.
- E. Scheduling regular meetings and training sessions with supervisory staff and/or employees to keep them abreast of policy changes and program objectives.
- F. Regular communication with staff to emphasize the agency's EEO policies, including the policy against harassment of employees.

### **1.2.3. Employees**

All employees have a responsibility to contribute to equal employment opportunity within the OAB and to see that the program is faithfully executed. These responsibilities include:

- A. Apply all laws, rules, regulations, policies, and procedures fairly and impartially toward all persons, without regard to race, color, creed, sex, age, national origin, disability, religion, or political opinion or affiliation.
- B. Exhibit an attitude of respect, courtesy, and cooperation toward fellow employees and the public.
- C. Aid supervisors and managers in carrying out their responsibilities with regard to the EEO/AA program.
- D. Be familiar with the affirmative action plan and make a good faith effort to complete their assigned responsibilities as identified in the plan.

## **1.3 Dissemination of Affirmative Action Plans**

### **1.3.1. Internal**

Internal communication of the agency's Affirmative Action Plan will be accomplished in the following manner:

- A. A copy of the signed policy statement and the Affirmative Action Plan will be provided to all current employees, prospective employees and new hires in hard copy and electronic formats.
- B. All new hires will be briefed on the EEO/AA policy and their responsibilities in the EEO/AA program.
- C. A notice and a copy of the signed policy statement will be placed in a central location in the office.

A copy of the Affirmative Action Plan is given to each new employee. During the new employee orientation session, each new hire is told of the importance of having a workplace free of illegal discrimination. An overview of the policies on affirmative

action/equal employment opportunity, sexual harassment and harassment are discussed in detail. New hires are told during their orientation session that the policies on discrimination, harassment and sexual harassment are contained in the agency's affirmative action plan and that the agency does not condone illegal discrimination in any manner. New hires are told that they have a responsibility to report such behavior to the Executive Director. The OAB posts the Equal Employment Opportunity Policy Statement and the Sexual Harassment Policy Statement on a bulletin board in the office break area. Any individual who supervises others is presented with information relating to the proper implementation of this plan and all personnel are advised of any changes, information etc., that affects them through periodic group meetings.

### **1.3.2. External**

It shall be the policy of the OAB to provide the agency's policy statement and plan to the public and interested parties in the following manner:

- A. A copy of the agency's policy statement and plan will be posted on the OAB's public website.
- B. A copy of the agency's policy statement and plan will be provided to community groups, minority organizations and women's organizations upon request, and at any other time when such communication is appropriate, such as during periods of recruitment of office personnel.
- C. A copy of the policy statement and plan will also be provided to colleges, universities and state employment office upon request.
- D. A statement of this agency's commitment to equal employment opportunities will be included in all advertising for positions available in this agency.

This plan and the agency's policies regarding employment decisions are available for public inspection during regular office hours, 8:00 a.m. to 5:00 p.m. Monday through Friday, excluding official state holidays. Copies of these documents will be provided to anyone who makes such a request. Requests for a copy of the plan or policies should be made by calling (405) 521-2397.

## **1.4 Disabled Persons and Older Persons**

The OAB is committed to equal employment opportunity for disabled persons and persons over 40 years old with its non-discriminatory advertising for positions through public advertisement in local newspapers and job postings on both the Office of Personnel Management and the OAB's websites. To further evidence the agency's commitment, on June 30, 2009, the OAB had three out of seven staff members who are over the age of fifty.

## 1.5 Training and Recruitment

### 1.5.1. Training

Training opportunities are provided to all employees on a non-discriminatory basis that will:

- A. Improve employee's current performance
- B. Qualify employee for advancement to higher-level positions; or
- C. Fill positions, which have been identified as line of progression

### 1.5.2. Recruitment

An active recruitment of new employees will be utilized which affords the best opportunity to maintain an appropriate work force balance in all job categories.

- A. State and Local Government Organizations  
Oklahoma Employment Security Commission\*  
Oklahoma Office of Personnel Management  
State Professional Licensing Agencies\*  
State Universities and Colleges\*  
State Vocational-Technical Schools\*  
Local Chamber of Commerce\*\*
- B. Minority and Women's Organizations  
Business and professional Women's Clubs\*\*  
Business and Professional Minority Organizations\*\*  
NAACP Affiliates\*\*  
National Organization of Women\*\*\*  
Urban League Affiliates\*\*
- C. Other Organizations and Schools  
YMCA and YWCA\*\*

\* Utilizes Office of Personnel Management's website for postings

\*\*Either did not respond to inquiries concerning job opening postings or informed staff that they will not post.

## 1.6 Evaluation of Preceding Years' AA/EEO Efforts

### Good Faith Efforts:

The OAB advertises its available positions in such a way as to offer this information on a wide-spread scale to all interested persons, both internally and externally, regardless of their race, creed, color, sex, national origin, age, religion, political affiliation or opinion

or disability. The OAB seeks to achieve prompt and full utilization of minorities as well as to maintain full utilization of women in all areas. The OAB applies every good faith effort to ensure that qualified minorities and women are among the candidates available to fill each position and that they are fairly considered. In each employment advertisement and job announcement the OAB includes notice of its commitment to equal employment opportunity. For assistance in recruiting from minority groups, the OAB posts job announcements on its own website and sends job announcements for unclassified vacancies to the Office of Personnel Management (OPM) for inclusion on its job announcement website as well as to the minority recruitment liaison with OPM. Recruitment advertisements for unclassified vacancies are placed in the Oklahoman as the OAB believes that the readership of the Oklahoman encompasses minority groups as well. The OAB also seeks to place advertisements for unclassified vacancies in newspapers with significant minority group readership such as the Black Chronicle, El Nacional, and the Dan Quyen newspapers.

The OAB began the period with 5 females, 1 of which is black, and 2 white males. As of June 30, 2009, the OAB had 7 females, 2 of which are black and 1 Hispanic, and 2 white males.

During the period, the OAB 100% of the employees hired were minority females. The OAB had no separations during the period. Though the OAB is a small agency it will, in the event that other vacancies do occur, continue to make every effort to achieve its affirmative action goals.

### **1.7 Identification and Analysis of Problem Areas; Corrective Action**

The procedures and practices of the OAB have been reviewed to ensure compliance with all applicable statutes, rules, policies and procedures. The OAB did not find any problem areas. The procedures and practices of the OAB are designed to increase the number of qualified minorities and females that are included in the pool of applicants, to ensure that each applicant is impartially considered, and to result in the selection and appointment of the most qualified applicant.

The OAB labor force is composed of over three-fourths female and one-third minorities. The OAB will continue to seek out qualified minority applicants for consideration in all of its vacancies. Those involved in the selection process are charged with responsibility for identifying the most qualified applicants and recommending a finalist candidate for each vacancy. The ultimate hiring decision is made by the Executive Director. It is her responsibility to review recommendations of the selection team and the process used by the team to select the most qualified applicant as well as how minority applicants are recruited for each vacancy. The Executive Director has the ultimate responsibility for correcting underutilizations.

The goals adopted in this affirmative action plan and the results of past efforts are representative of the OAB's intent and commitment to continue to eliminate or reduce any identified imbalances with respect to minorities, females, aged or disabled persons.

### 1.7.1. Areas of Review

Areas of review will include, but not limited to the following:

- A. Imbalances in the work force with respect to minorities and women. Each instance of underutilization should be reviewed separately, identifying the affected group, the EEO category and all circumstances relating to the underutilization.
- B. Applicant flow for minorities and women
- C. The total selection process, such as position descriptions, application forms, interview procedures, final selection process, etc.
- D. Transfer and promotion patterns and practices
- E. Training and development programs
- F. Work place atmosphere
- G. Technical compliance with the affirmative action plan, such as the internal and external dissemination of the EEO/AA policy, posting of EEO posters and information for access by applicants and employees, and similar activities
- H. Recruitment and referral activities

### 1.7.2. Reporting Corrective Actions

In order to maintain compliance, the Executive Director will identify problem areas and take corrective actions by reporting:

- A. Problem Statement: A brief description of the situation or problem that related to a specific EEO concern.
- B. Objective: A general statement of commitment to alleviate the problem or deficiency.
- C. Corrective Action: A list of the specific, concrete action items or activities designed to correct the identified problem or deficiency.

## 1.8 Internal Audit and Reporting

### 1.8.1

The Executive Director will maintain or see that an internal audit and tracking system which will monitor the personnel transactions, training, and recruitment activities for reporting activities with any EEO/AA significance is maintained. An effective internal monitoring and evaluation system should enable the OAB to determine the following:

- A. Progress made towards meeting the objectives of the overall affirmative action program.
- B. Problem areas that need remedial action.
- C. Any objectives that have not been implemented.

Currently, the OAB's confidential personnel records contain:

- A. The monthly number of training hours for each employee;
- B. Promotions (when available), demotions, new hires and separations;
- C. The ethnic or race of each employee as submitted on the OPM form "Equal Employment Opportunity and Affirmative Action Statistics";
- D. When a position is available, documentation as to the recruitment procedures and resumes received;
- E. Diverse background of individuals who are selected for interview.

### **1.8.2**

The agency's internal audit and monitoring system includes:

- A. A description of the records maintained and methods used to report recruitment referrals, placements, promotions, demotions, separations, etc.
- B. A description of the content and frequency of any reports prepared to provide information to managers and supervisors on the achievement of the organizational EEO/AA program goals and timetables.
- C. A description of the methods and procedures used to inform the OAB of the agency's EEO/AA program efforts and progress, problem areas and recommended corrective actions.

The descriptions of the OAB records maintained, recruitment referrals, placements, promotions, demotions, separations, etc. are enumerated in previous sections of the plan. Because the OAB is a small agency, progress reports to upper level management is not applicable since the Executive Director of the agency is the person responsible for the EEO/AA program, problem areas and recommended corrective actions. However, copies of the OAB's annual EEO/AA report is made available to the OAB members who have oversight of the agency