

OKLAHOMA ACCOUNTANCY BOARD
AFFIRMATIVE ACTION PLAN
September 1, 2007

Section 1

1.1 Policy Statement

Consistent with federal and state laws and guidelines established for equal employment opportunity and affirmative action, as Executive Director of the Oklahoma Accountancy Board (herein after referred as "OAB"), I reaffirm my continuing policy to provide equal employment and advancement opportunity in all job classifications of this agency without regard to political or religious opinion or affiliation, race, creed, gender, age, color, national origin, 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. Each employee is reminded that all personnel actions as well as all decisions relating to employment practices are made in accordance with the spirit of equal employment opportunity for all.

The OAB has developed an affirmative action plan to help the agency achieve the goal of equal employment opportunity all. Edith Steele, Executive Director, located at 4545 North Lincoln, Suite 165, Oklahoma City, OK 73105, at telephone number (405) 521-2660 or e-mail address esteele@oab.ok.gov, has the responsibility of implementing the plan, including monitoring and evaluating the OAB progress.

In addition, I will also serve as the Affirmative Action/Equal Employment Opportunity Officer for this agency. I am 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 the OAB's firm commitment in this most important area.



Edith Steele, Executive Director

POLICY AGAINST SEXUAL HARASSMENT

July 1, 2007

It is the policy of the OAB not to discriminate in any of its employment practices on the basis of political or religious opinion or affiliation, race, creed, color, gender age, ancestry, nation origin, marital status 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;
- 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 matter, 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 Assistant Administrators 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 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.

A handwritten signature in cursive script that reads "Edith Steele". The signature is written in black ink and is positioned above a horizontal line.

Edith Steele, Executive Director

1.2 Responsibility for Affirmative Action and Equal Employment Opportunity

The overall administration and coordinator of the Affirmative Action Plan is the responsibility of the Executive and Deputy Directors and will include:

1.2.1 EEO/AA Officers' Responsibility

- 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 person.
- 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

- 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

- 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.
- 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.

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' commitment to equal employment opportunities will be included in all advertising for position available in this agency.

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, the OAB currently has three out of seven staff members who are currently over the age of fifty and one staff member who just recently retired at the age of 76.

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

In 2006, the average time for employee training was 58 hours.

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
 - Hispanic Culture Center and Affiliates

Native American Center and Affiliates
Asian-American Affiliates
Religious Organizations and Leaders

C. Other Organizations and Schools

YMCA and YWCA
United Way Organizations
Private Colleges and Schools with high Minority and Female Participation

1.6 Evaluation of Preceding Years' AA/EEO Efforts

Good Faith Efforts:

The OAB, in its efforts for recruiting, advertises its available positions in areas which would 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. As an example, with a position recently available, advertisements were placed in the *Daily Oklahoman* and the *Black Chronicle*. The position was also posted on the OAB and OPM websites. These recruiting efforts allow for a diversity of applicants.

1.7 Identification and Analysis of Problem Areas; Corrective Action

The Executive Director will hold the responsibility of identifying and monitoring compliance, problem areas and corrective action when necessary. The OAB has a small work force and, in turn, does not have a large turnover. However, if a vacancy does occur, the OAB takes all opportunities to ensure the availability of minorities and females in the hiring pool and the opportunity to interview.

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

- A. How much progress has been 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 action.

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.