

## PART TWO: AFFIRMATIVE ACTION POLICY STATEMENT

### PURPOSE AND PROGRAM

#### A. Purposes and Responsibilities

The purpose of this statement is to outline, clarify and establish Acadiana Legal Service Corporation policy as it pertains to affirmative action and equal employment progress.

1. The Administrative Director will be responsible for the overall supervision of the Affirmative Action Program and this program will be audited by an appropriate committee composed of Board of Director members and staff.
2. Acadiana Legal Service Corporation affirms its dedication to the policy of insuring that all persons, regardless of race, color, religion, national origin, age, sex, or disability will have an equal opportunity for employment.

#### B. Affirmative Action Program

The Corporation is an equal opportunity employer and abides by the requirements of the following as applicable: Title VI and Title VII of the Civil Rights Act of 1964, as amended by the Equal Opportunity Act of 1972, Federal Executive Order 11246, the Federal Rehabilitation Act of 1973, as amended, the Vietnam Era Veteran's Readjustment Assistance Act of 1974, Title IX of the Education Amendments of 1972, the Age Act of 1975, and the Americans with Disabilities Act of 1990. All members of management having administrative or directional authority are responsible for conducting day to day personnel activities in a manner to insure compliance with Acadiana Legal Service Corporation's non-discriminatory policy and affirmative action program and will be held directly responsible and totally accountable by the Executive Director for the complete adherence to this policy. They are responsible for the complete education and dissemination of this policy to all personnel within their area of responsibility.

1. **Dissemination: Internal** – To ensure understanding and continuing implementation of this program, the subjects of equal opportunity will be discussed at appropriate management and staff meetings and included in the personnel policies manual. Modifications will be made to reflect the implications of such discussions when applicable. Personnel policies will be discussed as part of employee orientation activities. These policies and procedures will be available in each office of the Corporation.
2. **Diffusion: External** – Acadiana Legal Service Corporation will advise all interested sources of the Corporation's non-discriminatory policy and its

commitment to equal employment opportunities by using the following activities:

- a. Recruiting sources are informed of the policy, requiring that these sources actively recruit and refer minorities and women for all positions.
- b. Other community organizations, when possible, will be provided with affirmative action technical assistance.
- c. Prospective employees are informed of the existence of the affirmative action policy and the notation "Equal Opportunity Employer" appears in all employment advertising.
- d. Advertising is placed in local minority orientated media so that direct contact will be made with minority groups.
- e. Written notification of the affirmative action policy will be sent to all contractors, vendors and suppliers requiring appropriate action on their part.
- f. Surveys will be conducted to determine affirmative action posture of vendors.

## II. AFFIRMATIVE ACTION PROGRAM GUIDELINES

### A. Affirmative Action in Employment

The Corporation shall offer all applicants, regardless of race, color, religion, sex, age, disability, national origin, the opportunity to qualify for employment with the Corporation, if their experience and qualifications meet the corporate requirements for the position in question. All employees of the Corporation, regardless of race, color, religion, sex, age, disability, or national origin, will be afforded the same opportunities with respect to upgrading, lay-offs, rehiring, recalling, counseling, evaluations and seniority. All personnel actions such as transfers, promotions, etc., within the Corporation will be guided by the Equal Employment Opportunity Policy.

The Corporation will isolate positions that can be left vacant for a period of time without diminishing the efficiency of the affected unit, and seek qualified minority

and female applicants to fill these positions.

B. Orientation of Staff

An effective orientation program for all new employees is established which better prepares one for his or her first day on the job and enhances his or her potential for developing into a satisfactory employee. A system of periodic follow-up progress reviews is established for all employees.

C. Orientation of Community

The Corporation will continue to implement and maintain a close communicative relationship with the responsible leaders of local minority groups to show a sincere interest in achieving the goals of this program. Representatives of Acadiana Legal Service Corporation will work with the appropriate agencies and groups within the communities in which it operates in order to cooperate in the further development of community acceptance and adoption of non-discriminatory policies in employment.

D. Reporting

1. Frequency: The Administrative Director will submit semi-annual reports to the Executive Director on hiring, upgrading, transfers, and terminations to insure that such procedures are being administered in accordance with the affirmative action program.
2. Intra-Agency Procedures: Any employee who feels that he or she has noticed any discrepancies and/or deviations from this policy as is here established, should report same to their immediate supervisor in writing and forward a copy to the Administrative Director. The employee's immediate supervisor will make a full report to the Administrative Director on each violation. The Supervisor should include in the report, if there is a violation, how it was corrected, and what measures have been taken to prevent such a recurrence.
3. Inter-Agency Procedures: The Administrative Director will insure compliance with all requests for reports, investigations or summaries such as the "Affirmative Action Program" and the "Quarterly EEO Progress Report" and will be held accountable for the completeness, correctness and timely submission to the proper agency. The Administrative Director will act as liaison between the Corporation and the Equal Opportunity Commission and

other related agencies.

E. Affirmative Action in Purchasing

Where possible subcontractor and vendors will be requested to submit the Equal Employment Opportunity – 1 Report or a report acceptable to the Executive Director on an annual basis which reflects the fact that these companies are practicing equal employment in order to sell our organization materials, supplies, and/or services.

III. ASSURANCES

In order to assure that affirmative action is taken on those areas outlined in this statement, an annual inventory of progress reports will be compiled by the Administrative Assistant, audited by the Administrative Director and will include the following minimum information:

summary of goals and achievements

restatement of those goals not yet achieved

statement of newly identified problem areas and suggested corrective measures

copies of related reports and

additional reports as required by funding and regulatory agencies.

The Affirmative Action Policy, endorsed by Acadiana Legal Service Corporation, will be considered as an integral part of Corporation policy and will be adhered to on all points as stated.

## PART THREE: AFFIRMATIVE ACTION PLAN

### I. THE OBJECTIVES OF THE PLAN

The following objectives are sought to be accomplished by Acadiana Legal Service Corporation's Affirmative Action Plan:

- A. To formalize practices with regard to procedures for hiring, promotion, transfer, training and all other equal employment opportunities to which each person is entitled.
- B. To identify job categories in which minority groups and women are underutilized and possible deficiencies in Acadiana Legal Service Corporation's equal employment practices.
- C. To establish workable hiring procedures to correct underemployment and underutilization when identified.
- D. To develop affirmative actions to meet the hiring objectives and address any deficiencies as applicable.
- E. To establish internal audit procedures to monitor all aspects of the Affirmative Action Plan.

These objectives will assist in establishing an employment profile, with respect to ethnic origin, race, sex, age, and disability in each major job classification, that will be used as an approximate standard to examine utilization. Full utilization of minorities and women at all levels of management and operations is the goal the above objectives will achieve, thereby, encouraging a discrimination free, productive work environment.

An intergal part of the Plan will be the establishment of time frames that are directed toward implementing changes which comply with Acadiana Legal Service Corporation's affirmative action objectives in a propitious manner.

### II. MONITORING, REPORTING AND EVALUATION

#### A. Supervisory Personnel

The Executive Director will inform all supervisors of the affirmative action plan of Acadiana Legal Service Corporation, and advise them that their performance evaluation must reflect the level of their efforts and results in the implementation of the affirmation action plan in their respective units. It is the responsibility of each

supervisor to insure equal opportunity for all employees under his/her supervision in areas of work assignments, selection for training, advancements, salary and other conditions of employment. Supervisors will review regularly the progress of unit staff members to assure that employment practice guidelines are followed. Performance evaluation forms will be revised to include a measure of affirmative action efforts and results. Any act of discrimination by a supervisor will result in disciplinary measures.

B. Plan Evaluations

See Part Two, pages 16 & 17

C. Plan Evaluations

1. The affirmative action policy will be evaluated on an annual basis. The Administrative Director will undertake most matters on an emergency nature that may arise relative to affirmative action for the Corporation. All appeals and related actions will be referred to the Executive Director. The Executive Director will report actions concerning affirmative action to the Executive Committee of the Board of Directors. The Board of Directors' Executive Committee will provide final decision(s) on all affirmative action policies, procedures and changes thereof. Their functions are:
  - a. Develop, oversee and evaluate the actions taken by the program to draw women and minority persons into employment and participation in all benefits provided by Acadiana Legal Service Corporation.
  - b. Identify problems to be solved by the affirmative action plan; consider and select solutions from available alternatives; develop strategies to solve the problems; establish goals to be accomplished with an appropriate timetable.
  - c. Review annual evaluations of the affirmative action plan so that progress may be reported to the full Board of Directors.
  - d. Provide upon request to community agencies assistance in designing and monitoring an affirmative action plan.
2. Information to be reported, reviewed and gathered to foster evaluation will include, but not be limited to:

-Utilization analysis of minorities, women and the disabled

- Application and selection of minorities, women and the disabled
- Job descriptions
- Assessment of interview, test and related selection techniques
- Examination of applicant rejection ratio to selection ratio
- Participation in Acadiana Legal Service Corporation's benefits
- Examine possible areas of defacto segregation in terms of assignment, work station, etc.
- Discrimination due to seniority policies and practices
- Examination of Application Forms
- Report on workforce composition including employment profile
- Comparison of key statistical data with Department of Labor Statistical data. Key statistical data that quantifies numerically by race, age, sex, etc.
- Assessment of progress towards completion of stated objectives

Annually Acadiana Legal Service Corporation will review the Affirmative Action Plan and implement changes to correct discrepancies identified, and to reassess the completion of stated objectives.

### III. COMPLAINTS

Complaints relative to the composition of or compliance to the affirmative action plan shall be made to the Administrative Director. If a satisfactory settlement is not then accomplished, a direct referral will be made to the Executive Director. The person complaining will be instructed by the Executive Director of the steps to be followed within the Corporation. Complaints are then referred to the Executive Committee for final disposition.

#### A. Complaints

1. Complaints of racial or sex discrimination within the Corporation will be directed to the Administrative Director. Should any personnel action be

required, the Administrative Director will refer his findings and recommendations to the Executive Director.

2. Procedures: Complaints of discrimination in participation shall be processed in the following manner:
  - a. The aggrieved person(s) may contact the Administrative Director to discuss the complaint.
  - b. The Administrative Director shall attempt to resolve the complaint by informal means within fifteen (15) calendar days from the receipt of the complaint.
  - c. In attempting to resolve a complaint informally, the Administrative Director shall contact all parties including appropriate supervisors. Reports to the Grievance Committee of the Board of Directors will be through the Executive Director.
  - d. If the complaint is not resolved, the complainant may appeal to the Executive Director.
  - e. If the complaint remains unresolved, after referral to the Executive Director, the complainant may appeal to the Executive Committee of the Board of Directors.

- B. It is the responsibility of the Executive Director to inform the person(s) making complaints of discrimination based on equal opportunity or appeal procedures and the right to file formal complaints with the Legal Services Corporation and/or federal, state or local agencies having jurisdiction.




VI. Reaffirmation

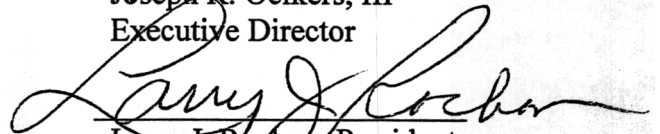
The Affirmative Action Policy Statement and Plan adopted and subsequently reaffirmed by the Board of Directors of Acadiana Legal Service Corporation were reviewed, revised and reaffirmed effective December 1, 2006, to reflect experience, changes in laws and regulations, and better understanding of effective approach that will ensure equal opportunities for all.

REAFFIRMED:

4-5-07

April 3, 2007

  
Joseph R. Oelkers, III  
Executive Director

  
Larry J. Rochon, President  
Board of Directors