

CONCHO VALLEY COUNCIL OF GOVERNMENTS

EQUAL EMPLOYMENT OPPORTUNITY POLICY

AND

AFFIRMATIVE ACTION PLAN



February 2024
CY 2022 Data

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EQUAL EMPLOYMENT OPPORTUNITY POLICY

POLICY STATEMENT

This Equal Employment Opportunity (EEO) and Affirmative Action (AA) plan is to ensure that the Concho Valley Council of Governments (CVCOG) follows all local, state, and federal laws prohibiting employment discrimination. This policy applies to all employment actions, including, but not limited to, recruiting, hiring, selection for training, promotions, transfers, demotions, layoffs, terminations, rates of pay, or other forms of compensation. Employment and promotional opportunities will be given to the best qualified individuals based on competency, knowledge, and skill. This policy shows that CVCOG is committed to the development and implementation of a written nondiscrimination program. This policy will set forth guidelines, practices, and procedures, along with identifying goals and timelines. This policy is available for inspection by any employee, applicant, or other member of the public, upon request.

CVCOG is actively committed to providing a workplace free from discrimination. No person shall be unlawfully excluded from employment opportunities based on race, color, religion, national origin, age, sex, pregnancy status, disability status, veteran status, genetic information, sexual orientation, gender identity, or other protected group status. Exceptions may exist when required by law or regulation.

All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge/ complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in a protected activity is strictly prohibited and will not be tolerated. This statement is confirmed with the Retaliation Policy, located in the CVCOG Employee Handbook.

CVCOG is committed to providing reasonable accommodations to applicants and employees who need them due to disabilities or religious practices/observances, in accordance with local, state, or federal law, in the absence of undue hardship. This statement is confirmed with the Reasonable Accommodation Policy, located in the CVCOG Employee Handbook.

CVCOG Executive Director (ED), John Austin Stokes, carries the overall responsibility for the EEO policy. The ED will also uphold a high level of accountability for compliance with the EEO policy. To ensure day-to-day management, including preparation, monitoring, and compliancy investigations, Felicia Lindsey, Human Resources Manager, has been appointed as the EEO Officer. Felicia Lindsey reports directly to John Austin Stokes, and acts on his authority with all levels of management and employees.

CVCOG understands the burden of this responsibility must be shared. All executives, management, and supervisory personnel will be assigned specific tasks to ensure compliance with the implementation and monitoring of CVCOG's EEO Policy. CVCOG will evaluate its manager's and supervisor's performances, regarding their implementation of CVCOG's policies and procedures, in the same way CVCOG manages other performance goals.

CVCOG shall base employment decisions on the principles of EEO and with the intent to further CVCOG's AA program goals. CVCOG shall utilize the AA plan to ensure that individuals in minority groups, females, qualified disabled persons, older workers, veterans, and disabled veterans are hired, and that these employees are encouraged to aspire for promotion and are considered equally as promotional opportunities arise.

PROCEDURES

Internal Communications

A memo or training, provided by the CVCOG EEO Officer, will be sent or completed annually for all employees regarding the (EEO) Policy. The EEO policy is referenced in all CVCOG's personnel policy manuals. A written memorandum will be sent to all supervisors, informing them of their general responsibilities regarding the AA program. Special meetings will be held annually with supervisory personnel to discuss progress and problems relative to the program. Required EEO posters, CVCOG'S EEO policy, EEO Officer's contact information, along with periodic notices regarding the program will be posted in conspicuous places in all CVCOG facilities.

External Communications

CVCOG will ensure the following information is present on all external communications regarding vacant positions, solicitations, or any other appropriate information being prepared for public consumption;

- All employment advertisements will contain the words "Equal Employment Opportunity Employer."
- All employment applications, paper or electronic, will contain the following clause:
 - "CVCOG is an equal opportunity employer and will not discriminate against an employee or applicant due to race, color, religion, national origin, age, sex, pregnancy status, disability status, veteran status, genetic information, sexual orientation, gender identity, or other protected group status unless based upon a bona fide occupational qualification. If you believe you have been discriminated against, you should notify the Equal Employment Officer or the Equal Employment Opportunity Commission."
- A letter will be sent to minority contractors when construction is contemplated soliciting their bids or involvement in the work stating that any company subcontracted to do at least \$10,000 of business will be required to;
 - Ensure that it does not discriminate against any employee or prospective employee based on race, color, religion, national origin, age, sex, pregnancy, disability status, veteran status, genetic information, sexual orientation, gender identity, or other protected group status and
 - Take affirmative action to ensure they meet EEOC guidelines.

CVCOG will post the EEO policy statement on its website at www.CVCOG.org and it will be made available to employees on their internal "Teamsite."

MANAGEMENT RESPONSIBILITY

General Responsibility

The actions of every employee are important in achieving the EEO Plan's objectives. Disciplinary action will be taken against any employee found to be deliberately obstructing implementation of the plan or participating in any discriminatory behaviors. Every supervisor is critically important to program success and should be familiar with EEO policies and procedures. Performance in meeting AA plan objectives may be included in future performance reviews.

Appointment of Equal Employment Opportunity Officer

Overall responsibility for EEO and AA program compliance for CVCOG is vested in the Executive Director. Felicia Lindsey, Human Resource (HR) Manager, is the designated EEO Officer. Individuals who would like to discuss and/or file a complaint alleging discrimination should contact the EEO Officer by phone, e-mail, or in person. All contact information is available on the CVCOG website.

The Equal Employment Opportunity Officer has the responsibility to:

- Concur with the hiring and promotion process.
- Ensure the completion of EEO training for all new supervisors and managers within 90 days of their appointment.
- Annually review and revise the AA plan as appropriate.
- Set general goals for implementation of and compliance with the AA plan.
- Annually audit and evaluate the AA program and prepare a report concerning the performance of CVCOG, its departments, and its management personnel regarding the AA program.
- Establish goals and procedures for implementing the review and redesign of current personnel practices and correcting any underutilization of minorities, women, older workers, veterans, or disabled individuals.
- Assist and counsel all department heads, managerial, and supervisory personnel regarding their AA responsibilities.
- Provide training for employees and managers no less than once per year.
- Conduct regular discussions with supervisors, employees, and affinity groups to ensure implementation and compliance of the AA plan.
- Maintain a liaison with the Equal Employment Opportunity Commission (EEOC), and other government compliance agencies, as well as with all community organizations with an interest in AA.
- Investigate and resolve allegations of discrimination against CVCOG or its employees.
- Keep management informed of the latest developments in the entire EEO area.
- Assist in identifying problem areas and establishing local goals and objectives.
- Review the qualifications of all employees to ensure minorities, women, older workers, veterans, or disabled individuals have full opportunities for transfers and promotions.

CVCOG Supervisors and Department Directors will be responsible for:

- Analyzing their work force relative to identifying possible utilization of women, minorities, older workers, veterans, or the disabled.
- Setting goals and timelines for bringing their agency into compliance with the overall AA program.
- Actively promoting a positive climate concerning AA.

Compliance/ Procurement Specialists will be responsible for:

- Requesting an EEO Policy from all subcontractors that are contracted at \$10,000 or more. (Per Executive Order 11246)
- Requesting AA plans from supply or service subcontractors with 50 or more employees and a contract of \$50,000 or more. (Per Executive Order 11246)

Subcontractors must agree that during the performance of a contract they will be responsible for:

- Treating all applicants and employees without discrimination against race, color, religion, national origin, age, sex, pregnancy status, disability status, veteran status, genetic information, sexual orientation, gender identity, unless otherwise required by law or regulation.
- Providing EEO Policies and AA plans to the Compliance/Procurement Specialists as requested.
- Identifying itself as an EEO/AA employer and identifying any special consideration as required by law or regulation in all recruitment advertisements.

- Ensuring all subcontracts for program service delivery include appropriate provisions ensuring compliance with all applicable laws and regulations relating to the subject and intent of this policy.

The subcontractor shall be advised of any complaints filed with CVCOG alleging that a subcontractor is not an EEO employer. These complaints will be referred to the EEO Officer for the purpose of review and possible complaint action. The report of the Officer will be transmitted to the Executive Director. A summary of the said report may be considered as a determining factor of any future decisions regarding contracting with the subcontractor involved.

PERSONNEL PRACTICES

Recruitment

All available job positions will be posted on the Texas Workforce Solutions (TWS) website, a known and active advocate of minority groups. Positions will also be listed on CVCOG's website and on other appropriate job board sites. Current employees will receive immediate notification of job postings, in an effort to encourage in-house promotion & growth. All job postings will contain the following statement: "An Equal Opportunity / AA Employer." Efforts to employ women, minority, older workers, veterans, or the disabled for all part-time positions will be made to encourage their interest in full-time employment opportunities.

Job Description Analysis

Job descriptions will be reviewed annually to accurately reflect the function and duties of all CVCOG positions. This ensures position descriptions accurately indicate the actual skills required, as position descriptions will be set at the minimum level needed for entrance into the job. Position descriptions will be reviewed to assure they are related to job content and are set at the minimum level needed for entrance into the job. As positions evolve, job descriptions should evolve to include new roles and duties.

Promotions, Job Assignments, and Termination

No applicant will be denied a promotion or job assignment based on race, color, religion, national origin, age, sex, pregnancy status, disability status, veteran status, genetic information, sexual orientation, gender identity, or other protected group status. Applicants and employees will be encouraged to seek out promotional opportunities, when eligible, per the CVCOG handbook. CVCOG supervisors and managers ensure succession planning is done on an annual basis. Selections will be based on capability and potential to train and learn. During every employee's semi-annual performance management discussion, their supervisors or managers will ask questions regarding the employees' interest in promotional opportunities. Supervisors and managers will discuss the qualifications the employee currently possesses for said opportunities, and what type of training is needed for those opportunities. Supervisors and managers will gather a list of all those interested and provide it to the Director and HR. Employees observed to have skills or qualifications for promotion or advanced training opportunities, who have not explicitly stated an interest in promotional opportunities, shall be provided information regarding their performance and strongly encouraged to seek out promotion or training opportunities.

Job assignments will be delivered based on tasks covered in the appropriate job description. Assignments may also be distributed based on employee potential to grow or acquire new skills without regard to any above-mentioned protected classes. Employees will be terminated only for just cause or their own volition.

Training

Whenever any training activity is sponsored, special attention and consideration will be given to securing the participation of women, minorities, older workers, veterans, or the disabled. Where jobs can be learned in a short period of time, formal on-the job training programs will be instituted to facilitate the transition of minority groups, females, qualified disabled persons, older workers, veterans, and disabled veterans who have minimum qualifications

and possess the capability and potential to learn a new skill or role. Where formal training is necessary to qualify for a job, in-house training and cross training programs will be established whenever feasible.

Work schedules will be adjusted so as to permit the participation in training programs. Records will be maintained as to the numbers and percentages of women, minority, older workers, or the disabled applying for and participating in all training programs.

Facilities

Our current facilities will be examined annually to ascertain if they, in any way, discourage the general public or employees on the basis of race, color, religion, national origin, age, sex, pregnancy status, disability status, veteran status, genetic information, sexual orientation, gender identity, or other protected group status. Appropriate steps will be taken to correct any inequities as laws or properties change. Currently, all property owned by CVCOG meets all ADA (Americans with Disabilities Act) requirements.

GOALS AND TIMELINES

CVCOG will annually be required to analyze their work force and to set goals for the employment of women and minorities. The EEO Officer will review CVCOG goals and timelines for compliance. Goals should reflect results that reasonably could be expected from putting forth every good faith effort to make CVCOG'S AAP program work.

The EEO Officer will annually review the progress of CVCOG'S AA program and make necessary revisions to the goals, timetables, and priorities established. EEO logs will be kept which contain the name of the applicant, the minority group status, sex of the applicant, and the job applied for. The contents of this register will be summarized at least annually according to the positions for which employment applications were received, and the applicant flow and will be compared with the available census data.

CVCOG will annually analyze all position descriptions, position titles, application forms, interview procedures, final selection processes, and similar matters to determine whether they are interfering with the hiring and advancement of qualified minorities and women.

INTERNAL EEO COMPLAINT PROCESS

Individuals who would like to discuss and/or file a complaint alleging discrimination should contact HR or the EEO Officer via phone, e-mail, or in person. The EEO Officer should be contacted immediately when you believe you have been discriminated against. The following procedures will be used to process discrimination complaints:

Filing a Formal Complaint

The complainant(s) must sign and complete their internal EEO Discrimination Complaint Form before a formal investigation can begin. The complainant(s) should be prepared to support any allegations claimed to be discriminatory by furnishing all pieces of pertinent evidence: letters, memos, dates, times, and/or witnesses to the alleged claim in the complaint. A mere allegation of discrimination is insufficient in order to make a determination. Be aware that the investigative part of the process is designed to establish the facts with basic information provided by all parties.

Mediation

The first step in resolving discrimination complaints is mediation. This step is used to determine whether the complaint can be resolved through discussion or training. Attempts will be made to help both parties discover a solution to their problem. Emphasis at this point is early resolution.

The EEO Officer is responsible for mediation of the complaint(s) by attempting to identify the problem and assist in providing solutions that satisfy everyone. The EEO Officer will:

- Verify the issues
- Identify whether the complaints are covered by the EEOC enforced law
- Mediate discussion on the problem
- Identify options
- Attempt to work out a resolution agreeable to all concerned, if possible
- Provide information on external enforcement agencies (i.e., EEOC, Texas Commission on Human Rights, FTA and DOT).

The EEO Officer has five working days to verify if a problem exists, then an additional five days to mediate or resolve the issue. However, if at the end of this time period there is no resolution in sight, the complainant(s) will be informed of their right to proceed with their complaint.

Rejecting a Complaint

If the EEO Officer decides to reject a complaint, the complainant(s) will be notified in writing within five working days after filing a formal complaint. It is within the authority of the EEO Officer to reject any claim if the officer determines that the allegations are not within the realm of the discrimination guidelines. If the EEO Officer makes this determination, then such notice of rejection will be final and cannot be appealed unless new evidence can be presented to the EEO Officer and such evidence falls within the discrimination guidelines of race, color, religion, national origin, age, sex, pregnancy status, disability status, veteran status, genetic information, sexual orientation, gender identity, or other protected group status.

Investigation

If a complaint is filed and mediation cannot be reached, the EEO Officer will continue to investigate the complaint fully. The investigation will be completed within twenty-five working days of the failed mediation. An investigation may be extended beyond the twenty-five working days if it is deemed necessary to conduct a more thorough and in-depth investigation. The EEO Officer will conduct interviews, take affidavits as needed from complainant(s) and other apparent witnesses, and will gather any other pertinent information from various sources.

In order to properly investigate any allegation of discrimination, it will be imperative that any employee with relevant knowledge assist in the investigation. Such participation may be in the form of verbal communications, written statements or providing other records that may be determined to be of a relevant matter. All employees deemed to have relevant knowledge of the allegations shall participate to the best of his or her ability during these investigations.

Informal Resolution

The EEO Officer, when feasible and consistent with CVCOG policies and procedures, will continue to informally attempt to resolve the complaint both during and at the conclusion of the investigation. The complainant(s) must sign and date any resolution offered that has been accepted. Such acceptance constitutes settlement of the complaint, however, any resolution offered and accepted does not constitute an admission of any wrongdoing by CVCOG or any of its agents.

One of the major objectives of the complaint process is fairness and early resolution of complaints. Consequently, CVCOG regards the efforts made by all parties in early resolution attempts as extremely important and crucial to the integrity and intent of this process.

Complaint Disposition

At the conclusion of the investigation not resolved by mediation, the EEO Officer will issue findings of fact and conclusion and will make recommendations for corrective action, if required, or other resolutions. The complainant will be contacted to receive and sign-off on their acknowledgment of receipt of the EEO Officer's disposition of their complaint. Thereafter, the accused person(s) will be notified of the EEO Officer's recommendations.

Appeal of Disposition

If the complainant(s) is not in agreement with the EEO Officer's findings and determination contained in the disposition, the complainant(s) may appeal the EEO Officer's decision in writing within five working days to the Executive Director. The Executive Director will then review the alleged violation and relevant facts, the Executive Director will issue a decision within five working days, in consultation with the EEO Officer.

If the complainant(s) is not in agreement with the Executive Director's finding and determination, he or she may appeal the decision in writing within five working days to the CVCOG Executive Committee. Complainant(s) will be advised that if the final decision is unacceptable, an appeal may be made to the EEOC, Texas Commission on Human Rights, or FTA.

CVCOG believes with current policies and procedures being followed, most complaints can be resolved internally. CVCOG strives to follow all federal laws prohibiting discrimination, including any enforced by EEOC. Therefore, CVCOG is obligated to inform its employees that an employee who believes they have either witnessed or fallen victim to discrimination may contact the EEOC at any time before, during, or after the CVCOG investigation.

Special Provision

If any allegation of discrimination arises with the EEO Officer and/or against the EEO Officer, such allegations will be referred directly to the Executive Director to process and investigate accordingly. Any attempts at resolution will be according to the above stated procedures.

STATISTICS AND RESULTS

METHOD

In order to obtain statistical information regarding demographic makeup of CVCOG employees, it was necessary to conduct a survey. A 6-question survey (please see last attachment for complete survey) was given out to all employees during new hire orientation to allow employees to self-disclose characteristics such as gender, ethnicity, race, veteran status, and disability status. Objective information about their employment is completed by Human Resources staff as part of the records management process. The survey data was reviewed as one group for all employees, and then broken down to look at all different group categories within CVCOG. Individual department data and additional details will be provided upon request and in accordance with open records requests per the Public Information Act.

The survey results were then compared with labor market statistics from the Concho Valley (CV). Results were obtained from American Fact Finder- Census Bureau using the factfinder.census.gov website. This information is gathered from each census by the United States Census Bureau. Data is based on estimates for the years in review. Data is broken down by county and is compiled for all fourteen counties and totaled to have complete data for the entire CV region that CVCOG serves. Each set of data is then compared against information gathered from the internal CVCOG surveys. With those results we can ascertain what goals CVCOG should adopt in the next years to be compliant with EEO and AA regulations.

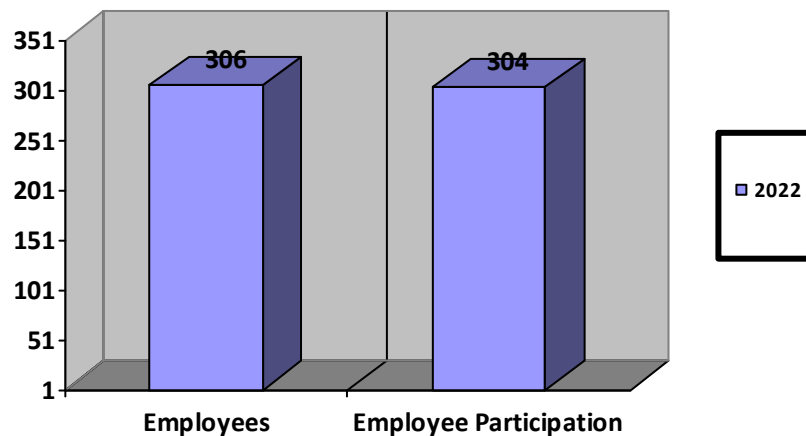
**In Spring of 2020, COVID-19 plagued the country and the world. This pandemic caused many delays and shutdowns. In July of 2021 a combined review and approval of the 18/19 EEO and AA plan was conducted. After the 18/19 EEO and AA Plan was approved the plan was to move all data to a calendar year schedule instead of a fiscal year schedule. Due to continued delays and issues with accurate data collection, during both COVID and during a large organizational move to a new facility, CVCOG will review data for CY 2022. This census and employee data is from 2022.*

RESULTS

Employee Participation

CY 2022: Of the 306 CVCOG employees (total of all people employed by CVCOG from January 1, 2022, through December 31, 2022, including those no longer employed by CVCOG and those still active, 304 of these employees participated in the survey. Participation was either partially (not answering all questions) or fully (answering all questions). This provided a 98% level of employee participation. Only two (2) employees opted not to complete the survey.

Analysis: Employee participation in the demographic surveys is vital to the AAP. If most employees provide answers to most questions, CVCOG can be confident that the results provide an accurate representation of CVCOG employees. 98% participation assures us the results obtained can be compared to those of our region for a reliable review.



CVCOG Salary Frequency

Salary	CVCOG EE	% of COG
up to \$14,999	7	2.30%
\$15,000 - \$24,999	77	25.30%
\$25,000-\$34,999	152	50.00%
\$35,000-\$49,999	41	13.50%
\$50,000 - \$74,999	18	5.90%
\$75,000 - \$99,999	5	1.60%
\$100,000 plus	1	0.30%

Salary	CV	% of CV
up to \$14,999	30,795	23.91%
\$15,000 - \$24,999	16,231	12.60%
\$25,000-\$34,999	17,405	13.51%
\$35,000-\$49,999	17,007	13.20%
\$50,000 - \$74,999	15522	12.05%
\$75,000 - \$99,999	6625	5.14%
\$100,000 plus	7282	5.65%

Analysis: CVCOG employees were given 7 salary options in the survey. This year, COG aligned the salary ranges with those listed in census data. Of the employees that participated in the survey, 98% participated in the question regarding salary. This year CVCOG data lined up with the Supporting data ranges from the CV ranges. Fact Finder uses data for the working population 15 years of age and older. CVCOG does not employee anyone under the age of 18; therefore, CVCOG data would not include anyone from this age group. Fact Finder also includes anyone over the age of 15 that reports no income, and CVCOG does not have employees that receive zero dollars.

During CY 2022 the largest salary group for CVCOG is \$25,000-\$34,999, encompassing 50% of CVCOG employees. Under the previous ranges COG held a similar statistic of 53% in the \$25,000-39,999 group. This would indicate a steady hold on the average pay at CVCOG.

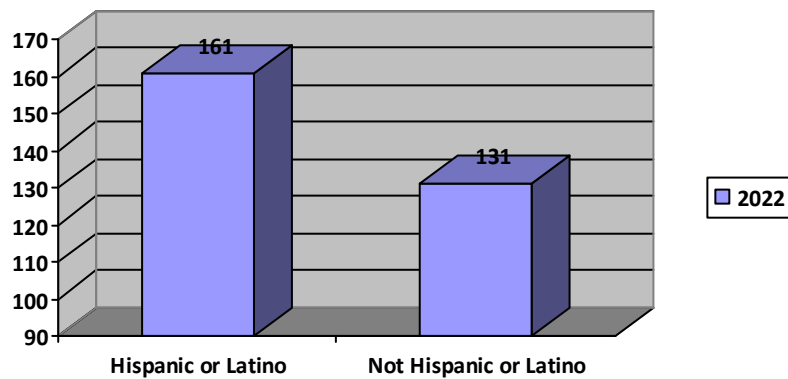
For the CV, the largest group is the smallest income group with up to \$14,999. Generally, this would mean CVCOG employees earn more than the average CV citizen. Most of our salaries fall in mid-range groups. This indicates a consistency of pay throughout our departments which shows like positions are getting similar pay. This is a key factor in showing a lack of discriminatory actions in terms of pay rates amongst staff. Our low numbers in the top tier also indicate that salaries are not excessive compared to our region. Data will indicate those employees landing in the top two highest salary groups are in supervisory and managerial positions.

Goals/Plan: As the data shows, there are no huge variances that need to be addressed regarding pay. CVCOG plans to maintain our competitive wages and will continue to follow all local, state, and federal laws when determining pay. CVCOG will continue to annually review salary schedules and ensure they align with other similar markets and allows

CVCOG to ensure good stewardship of taxpayer dollars. Later in this report, these salary ranges will be reviewed even further to include any disparity between male and female numbers within each salary group.

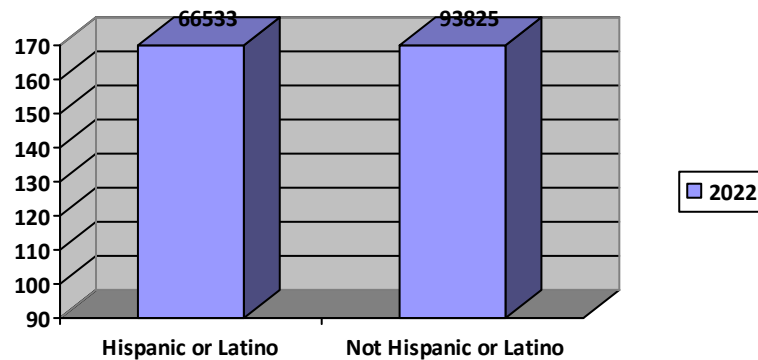
CVCOG Ethnicity

CY 2022: 169 participants (56%) marked they were Hispanic or Latino while 131 (43%) marked they were not Hispanic or Latino. 6 of the 304 survey participants did not respond to this question.



Concho Valley Ethnicity

CY 2022: 66,533 residents (41%) are listed as Hispanic or Latino, while 93,825 residents (59%) are listed as not Hispanic or Latino.



Analysis: CVCOG numbers have historically been close to a 50/50 split while the CV area has been closer to a 40/60 split. CVCOG made a slight increase to its Hispanic population to match the very minimal increase of the CV. CVCOG continues to have a higher Hispanic population than the CV area.

Goals/Plan: The Hispanic population continues to be considered a minority group. CVCOG continues to have a higher percentage of Hispanics than the Concho Valley and has shown an increase for CY 2022. At this time, there is no immediate action required, but this demographic will again be monitored during the next review. CVCOG will continue to equally attract Hispanic and Non-Hispanic applicants and hire the best qualified applicants.

CVCOG Race

CY 2022: 296 of the FY 17/18: 239 of 304 survey participants responded to a survey question regarding race and reported with the numbers shown in the chart below.

Race	2022	
	CVCOG EE	% of COG
White	261	86%
Black	24	8%
American Indian/Alaska Native	0	0%
Asian	1	0%
Native Hawaiian/Pacific Islander	1	0%
Other	9	3%

Concho Valley Race

Race	17/18	
	residents	% of CV
White	107,249	67.00%
Black	4,204	3.00%
American Indian/Alaska Native	2,225	1.39%
Asian	1656	1.00%
Native Hawaiian/Pacific Islander	89	0.05%
Other	44935	28.00%

Goals/Plan: CVCOG continues to be a diverse body of employees. There are more residents that are marking themselves as “Other” rather than a single race, and this is likely the cause for any discrepancies and CVCOG employees do not seem to be utilizing this option as often. CVCOG will continue to recruit and attract minority applicants and hire the best qualified applicant.

CVCOG and CV Military Veterans and Vietnam Era Veterans

CY 2022: 21 employees, (7%) reported being a Military Veteran and 4 of those Veterans (1%) are noted as being of the Vietnam era. 11643 CV residents (9.81%) reported being veterans and 4238 (3.57%) are noted as being of the Vietnam era.

Year	CVCOG Vets	% of COG	CVCOG Vietnam Vets	% of COG
COG	21	7%	4	1%
CV	11643	9.81%	4238	3.57%

Analysis: The CV area experienced a small decrease in its Veteran population. CVCOG Veteran numbers stayed stable at 7%. The overall CVCOG Veteran population percentage is now less than that of the veteran population in the CV. Upon review of this notable decrease, a large percentage of voluntary terminations were Veterans. When filling vacancies, the number of Veterans was not replaced by the amount lost.

In terms of Vietnam Era Veterans, both the CV and CVCOG experienced decreases. As Vietnam Era Veterans continue to age, they will experience a higher rate of death than the remaining Veteran population. This demographic is expected to

show a decrease every year. Not only is this group decreasing overall, but the number of Vietnam Era Veterans in the workforce will also decrease at a higher rate.

Goals/Plan: This is a significant event and will need to be monitored in coming years. CVCOG will need to see if events were simply a fluke, or if there is a true drop in the recruiting and hiring of Veterans. CVCOG will continue to recruit and hire veterans. CVCOG will attempt to reach out and build relationships with local veteran associations in order to locate a veteran applicant pool.

CVCOG and CV Disabled Persons

CY 2022FY 17/18: CVCOG had 20 employees (6.6%) report as being disabled or meeting the criteria for an ADA eligible disability. 22661 CV residents (14.63%) are listed as meeting ADA disability criteria.

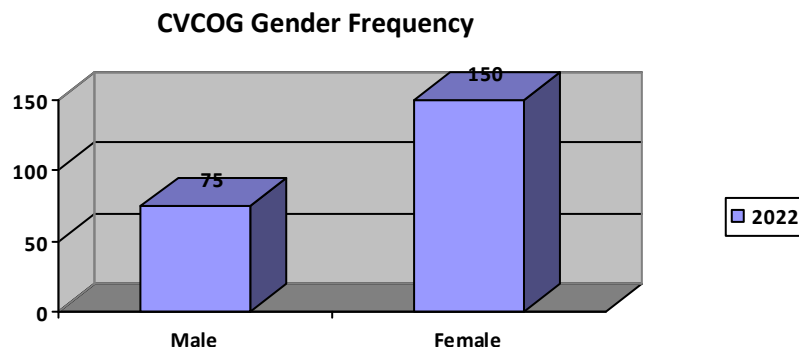
Year	EE w/disability	% of COG
2022	20	6.60%
	CV w/disability	% of CV Resid.
2022	22661	14.63%

Analysis: Previous years reported zero or one employee that self-identified as having a disability. Through educational efforts, CVCOG has been able to more accurately report their number of employees who have a disability. Not all employees realized what classified them under this category. This information was shared during trainings and CVCOG feels the number being reported is more accurate. CV numbers of residents reporting as having a disability have also slightly increased, indicating CVCOG should see an increase as well.

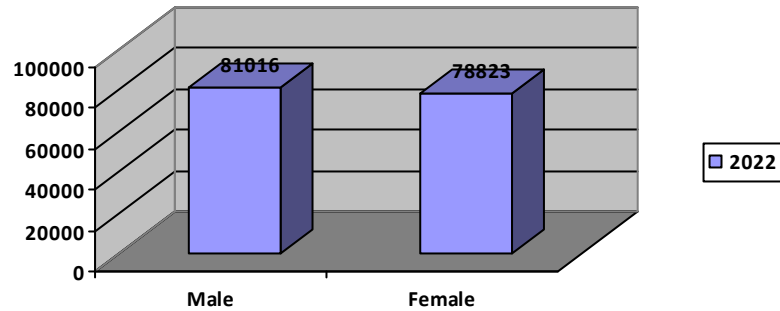
Another point to consider is that the total population is used when looking at the disabled population. CV numbers include residents of all ages, which incorporate those under the age of 18, who would not generally be part of the workforce. There is also no distinction on the number of those listed as disabled, on which residents have the physical or mental capability to work versus the residents not able to work. The inclusion of all people with a disability provides a misrepresentation when comparing against the percentage of employees with disabilities.

Goals/Plan: CVCOG will attempt to break down the data reported for CV residents with disabilities to have a better number of what percentages of disabled residents could be counted towards the overall CV workforce. This will make a comparison slightly more accurate. CVCOG will also work to see if there is a way to distinguish those with disabilities that can work from those that can't work. CVCOG will continue to work with the Texas Workforce Commission on training opportunities for working with people with disabilities as well as partner to increase recruiting efforts.

GENDER ANALYSIS



Concho Valley Gender Frequency



Analysis: For the past several years the CV has been very close to being half female and half male. The numbers for CVCOG are very different. In CY 2022 CVCOG once again was close to 25% to 75% split with women dominating both years.

Goals/ Plan: CVCOG continues to have a larger population of females than males. At this point, CVCOG needs to ensure it continues recruiting men and women to fill all roles, even those that have stereotypical genders associated. Areas of focus will be within the Head Start and Concho Valley Transit (CVT) programs. CVCOG will ensure that minority women are a focus in the recruiting and hiring process.

CVCOG Male vs. Female EEO Classifications

EEO Category	2022	
	COG % Male	COG % Female
Officials and Managers	14%	9%
Professionals	12%	28%
Technicians	4%	7%
Sales	0%	2%
Administrative Support	19%	22%
Craft Workers	0%	0%
Operatives	19%	4%
Laborers and Helpers	0%	0%
Service Workers	4%	3%

Concho Valley Male vs. Female EEO Classifications

EEO Category	CV % Male	CV % Female
Officials and Managers	12.64%	7.18%
Professionals	10.83%	17.35%
Technicians	1.98%	3.51%
Sales	10.37%	12.96%
Administrative Support	6.01%	26.50%
Craft Workers	20.54%	1.28%
Operatives	14.99%	6.22%
Laborers and Helpers	10.05%	1.55%
Service Workers	12.59%	23.47%

Analysis: Census data provides EEO job categories for a set of years and does not produce yearly data as it does with other demographic information. The information listed is valid through 2018 and will not be produced again until the 2019-2023 data is available, likely in 2024. CV and CVCOG align closely for men in the “Officials and Managers” classification and for women in the “Administrative Support” category.

These two categories include Teachers and Teacher Assistants which is a large contributor of total jobs at CVCOG. However, this year, more males have been placed in this category, putting it in a tie with the previous leader for males, which was the “Operative” category. This classification is mostly comprised of CVT driver positions. This is stereotypically a male dominated career field. For the CV, the largest male category is “Craft Workers”. These are generally skilled labor positions; CVCOG does not have any positions that qualify in this category.

Goals/ Plan: CVCOG is proud to have such a large group of females in the “Officials and Managers” and the “Professionals” category. The CVCOG female numbers for “Administrative Support” are slightly lower than the CV. Previously mentioned, CVCOG is hiring a notable amount of minority women, but is also putting these women in higher level positions. Due to our large number of Teachers and Teacher Assistants, that will likely have strong female populations, these two categories should continue to have high female numbers. CVCOG will continue to encourage and support minority women to grow and develop into higher level positions.

ADDITIONAL STATISTICS

Total Applicant Data

Total Applicants	832	Male Applicants		Female Applicants	
Total Males	192	Minority		Minority	
Total Females	631	Hispanic or Latino	93	48% Hispanic or Latino	347 55%
Total Non Specified	9	NH or Latino	15	8% NH or Latino	32 5%
		Non- Minority		Non- Minority	
		NH or Latino	68	35% NH or Latino	216 34%
		Not able to Identify		Not able to Identify	
		not specified	8	4% not specified	19 3%
		NH or Latino	8	4% NH or Latino	17 3%
		Not Specified		9	
		Minority			
		Hispanic or Latino	1	11%	
		NH or Latino	1	11%	
		Non- Minority			
		NH or Latino			
		Not able to Identify			

Promos in 2022

Males	6	White	18
Females	13	Black	1
		American Indian	0
		Asian	0
		Native Hawaiian	0

Disciplinary Action in 2022

Males	12	White	42
Females	38	Black	8
		American Indian	0
		Asian	0
		Native Hawaiian	0

Terms in 2022

Males	20	White	74
Females	59	Black	4
		American Indian	0
		Asian	1
		Native Hawaiian	0

Hires in 2022

Males	18	White	60
Females	49	Black	5
		American Indian	0
		Asian	1
		Native Hawaiian	1

SUMMARY

CVCOG eliminated many of its action items since the last EEO AA Plan was approved in July of 2021. There are still some items that need to be addressed, but much more data has been acquired. This year, as in the previous fiscal years, there were not overwhelming discrepancies that needed to be addressed. This review does provide a few areas of opportunity to watch and ensure no discrepancies develop. CVCOG will closely monitor race, veteran, and the disability demographics. These are the areas in which CVCOG will concentrate in order to prevent any inconsistencies between CV data and CVCOG data.

CVCOG will begin working on action items listed below. There are action items in progress to be corrected and some that will begin with the next calendar year, and some that are already in the works. These steps will be taken to ensure compliance of all local, state, and federal requirements in addition to funding agency requirements. CVCOG will continue to foster an environment free of discrimination based on a person's protected status such as race, color, religion, national origin, age, sex, pregnancy, disability status, veteran status, genetic information, sexual orientation, gender identity, or other protected group status.

ACTION ITEMS

- Develop stronger relationships with community agencies that work with disabled workers to develop a plan on recruiting workers with disabilities.
- Seek to understand the disability population data and determine how many people with disabilities are in the CV workforce.
- Ensure all supervisors and managers receive EEO training within 90 days (3 months) of hire.
- Show support for affinity groups and seek input on additional affinity groups.
- Track EEO job classifications by race in addition to sex.
- Work with ADP to better obtain EEO data on applicants based on job categories.

FINAL REMARKS

CVCOG strives to maintain an environment free of harassment based on race, color, religion, national origin, age, sex, pregnancy status, disability status, veteran status, genetic information, sexual orientation, gender identity or other protected group status. CVCOG will annually obtain demographic information and prepare an updated EEO and AAP in order for goals and plans to stay relevant to trends within the CV and with staff employed with CVCOG. While CVCOG will make an effort to attract and recruit minorities, veterans and disabled person, we will always hire the best qualified applicant.

All information, surveys and research will be filed together and kept for records management purposes for the longest allowable time per Federal Law.

EEO COMPLAINT FORM

Complaint Form Instructions: If you would like to submit a EEO complaint to the Concho Valley Council of Governments (CVCOG), please fill out the form below and send it to: Concho Valley Council of Governments, Attn: EEO officer, 2801 W. Loop 306 suite A, San Angelo , Texas 76904. For questions or a full copy of CVCOG's EEO policy and complaint procedures call 325-944-9666

1. Name (Complainant):		
2. Phone:	3. Home address (street no., city, state, zip:	
4. If applicable, name of person(s) who allegedly discriminated against you:		
5. Location and position of person (s) if known:	6. Date of incident:	
<p>7. Discrimination because of:</p> <div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Race / Color</div> <div style="width: 33%;"><input type="checkbox"/> Sex (includes sexual harassment)</div> <div style="width: 33%;"><input type="checkbox"/> Vietnam Era Veteran</div> <div style="width: 33%;"><input type="checkbox"/> National Origin</div> <div style="width: 33%;"><input type="checkbox"/> Sexual Orientation</div> <div style="width: 33%;"><input type="checkbox"/> Disabled Veterans</div> <div style="width: 33%;"><input type="checkbox"/> Creed / religion</div> <div style="width: 33%;"><input type="checkbox"/> Marital Status</div> <div style="width: 33%;"><input type="checkbox"/> Retaliation</div> <div style="width: 33%;"><input type="checkbox"/> Disability</div> <div style="width: 33%;"><input type="checkbox"/> Age</div> <div style="width: 33%;"><input type="checkbox"/> Limited English</div> </div>		
8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.		
9. Why do you believe these events occurred?		
10. What other information do you think is relevant to the investigation?		
11. How can this/these issue(s) be resolved to your satisfaction?		
<p>12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">Name:</div> <div style="width: 30%;">Address:</div> <div style="width: 30%;">Phone Number:</div> </div>		
Signature (Complainant)		Date of filing:

Demographic Survey

This survey is voluntary and should take about 5 minutes to complete. The information provided will be anonymous and will not be used to determine future promotions, future employment or disciplinary actions. The information provided in this survey will not be used to discriminate against any employee, in any way. The purpose of this survey is to get updated statistical information in order to update our Equal Employment Opportunity Policy and Affirmative Action Plan. This is done in an effort to be compliant with all EEO Rules and Regulations.

Again, this survey is voluntary. However, our organization is able to acquire more accurate results by having mass participation. Results will be combined to show percentages of demographics we have within our organization as a whole, and individual responses will not be shared with other staff members other than the Human Resource Manager and the Executive Director

- 1. Please write your name on this sheet and keep papers attached. Fill out form and return to your supervisor or HR.**
- 2. If you choose not to participate, please write your name on the instruction sheet and make a big X on the survey page. Then, return to your supervisor or HR.**

***Please don't write your name on the survey page, the pages will be separated and names only tracked for completion.**

Printed Name _____

Gender

Male
Female

Ethnicity

Hispanic or Latino
NOT Hispanic or Latino

Race

White
Black
American Indian or Alaskan Native
Asian
Native Hawaiian or other Pacific Islander
Other

Are you a military veteran?

Yes
No

Are you a Vietnam Era Veteran?

Yes
No

Do you qualify as having an ADA Disability?

NOTE: Although there is not an exhaustive list of disabilities under the ADA, the regulations identify medical conditions that would easily be considered a disability within the meaning of the law. These medical conditions are:

Deafness; Blindness; Diabetes; Cancer; Epilepsy; Intellectual disabilities; Partial or completely missing limbs; Mobility impairments requiring the use of a wheelchair; Autism; Cerebral palsy; HIV infection; Multiple sclerosis; Muscular dystrophy; Major depressive disorder; Bipolar disorder; Post-traumatic stress disorder; Obsessive-compulsive disorder; Schizophrenia.

Yes
No

FOR HR Use Only	
Q1:_____	\$_____
Q2:_____	
Q3:_____	
Q4:_____	
Q5:_____	
Q6:_____	
Q7:_____	
Q8:_____	
Q9:_____	
Q10:_____	
HD:_____	
TD:_____	
EEO Tracking # _____	

Thank you for your Participation.
Please return to your HR Department.