### City of Urbana

# **Human Relations Commission**

# **EEO Contract Compliance Program**

### **Frequently Asked Questions**

1. Who must participate in the City's EEO contract compliance program?

Participation in the contract compliance program depends on the amount of business that your company conducts with the City of Urbana over the course of a year. For contractors (construction trades and services), the threshold amount is \$25,000. For vendors (goods and non-construction services), the threshold amount is \$30,000. So, any contracts that are equal to or above these amounts require EEO certification.

2. How does my company apply for or renew EEO certification?

Your company must submit an EEO Workforce Statistics Form along with your corporate EEO Statement and the company's Sexual Harassment Policy.

3. My company already has EEO certification through our home state. Does my company still need to submit an EEO Workforce Statistics Form?

Yes. The City of Urbana requires completion and submission of the EEO Workforce Statistics Form (w/EEO Statement and Sexual Harassment Policy) for each participating company, regardless of concurrent state certification.

4. Who reviews the EEO Workforce Statistics Form?

The EEO Workforce Statistics Form is review by the Urbana Human Rights Commission (the "HRC").

5. What criteria are used in evaluating my company's compliance?

Generally, the HRC reviews your company's submission to make an initial determination as to whether the workforce reflects diversity. If the demographic information provided does not reflect diversity, then the HRC will more closely review the submission to determine whether the company has taken "good faith efforts" to achieve diversity.

If the HRC determines that your company has made those efforts, your company will more likely be issued full certification

If the HRC determines that your company has not made sufficient efforts toward diversification, your company will be issued either a (1) one-year provisional certification, or a (2) 6-month provisional certification.

6. My company received a notice of "Provisional Certification", what does this mean?

The HRC issues a "Provisional Certification" when it has concerns about your company's progress toward diversifying your workforce.

7. How can my company receive full EEO certification?

Your company can provide documentation that demonstrates "good faith efforts" towards improving diversity within your workforce.

8. What does "good faith efforts" mean?

"Good faith efforts" are tangible and measurable steps taken towards achieving EEO hiring goals (see question #9 for goals).

- 9. What are some of the steps my company can take to demonstrate "good faith efforts"? (Please tell me in plain English). These steps can also be found in more complete and formalized form in the Urbana Human Relations Commission EEO Contract Compliance Policies and Procedures.
- Create work-environment free from harassment. Train all management and supervisory staff to
  quickly identify and respond to any behavior or conduct that may lead to workplace harassment,
  particularly when the harassment is aimed at women or minorities. (Good Faith Effort #1)
- Make sure that your entire workforce, especially management and supervisor staff, are familiar with both your EEO and harassment policies. (Good Faith Effort #2)
- Make sure all employment advertising includes a statement that reflects your company's commitment to EEO hiring. (Good Faith Effort #3)
- Provide written notification to sub-contractors and business associates that reflect your company's commitment to EEO hiring. (Good Faith Effort #3)
- Notify the Urbana Human Relations Office if unions fail to refer minorities or women particularly if your company has referred them. (Good Faith Effort #4)
- Appoint an EEO champion within your company. This champion should be someone with enough authority to ensure effective implementation of the EEO policy. The champion should be responsible for keeping and maintaining all documentation of "good faith efforts" as well as generating reports as to the effectiveness of those efforts. (Good Faith #5)
- Encourage current minority and female employees to actively recruit other qualified or promising minorities and/or females. (Good Faith Effort #6)

- Create summer and after school apprenticeship programs for minority and female students who are interested in your trade. (Good Faith Effort #6)
- Create a list of minority and/or female recruitment sources. Keep this list updated. Send out
  job postings to these recruitment sources. Also, send written requests to all referring unions to
  send job posting to those recruitment sources. (Good Faith Effort #7)
- Create and maintain documentation (names, addresses and telephone number) for all minority and female applicants. Keep records the source from which the applicant came (i.e. external advertising, union referral, minority recruitment sources, etc.) (Good Faith Effort #8)
- Develop training and apprenticeship programs for minorities and females who are interested in your company. Use minority recruitment sources to advertise for these opportunities. (Good Faith Effort #9)
- Review your EEO policy at least once per year. Make sure to include all management and supervisory staff in this review – particularly those responsible for hiring, firing, training, promotions and front line supervision. Consider including the promotion of EEO initiatives as a factor in management and supervisory evaluates. (Good Faith Effort #10)

# DOCUMENT EVERYTHING..."IF IT IS NOT DOCUMENTED, IT IS NOT DONE"

10. How can I find out more about the City's EEO certification process?

To obtain more information regarding the City's EEO certification process, please feel free to contact Todd Rent, Human Relations Officer at (217) 384-2466 or via email at <a href="mailto:terent@city.urbana.il.us">terent@city.urbana.il.us</a>.