

Affirmative Action Plan

For

Aspire, Inc.
607 North 4th Street
Aberdeen SD 57401

Plan Year: 1/1/2020 to 12/31/2020

Preface

Aspire, Inc. is committed to the concept and practice of equal employment opportunity(EEO) and affirmative action in all aspects of employment. The management of Aspire, Inc has prepared this written Affirmative Action Plan (AAP), in accordance with its obligations under the Rehabilitation Act of 1973, that prohibits discrimination on the basis of disabilities, as amended, specifically, 29 U.S.C. 793 and its implementing regulations (41 CFR Part 60-741), that consideration be given to minorities and women(41 C.F.R. 60-2.13(e)), and for the employment of veterans in accordance arising under the "Vietnam Era Veterans" Readjustment Assistance Act of 1974, as amended, ("VEVRA"), 38 U.S.C 4511 et seq., specifically 38 U.S.C 4212 and its implementing regulations (41 C.F.R Part 60-250). This AAP should not be construed as a contract between ASPIRE, INC. and any government agency, or a contract for the benefit of any third parties including our employees or any applicants for employment.

Furthermore, in preparing this AAP, the terminology utilized in the Office of Federal Contract Compliance Programs (OFCCP) implementing regulations, as set forth in the Code of Federal Regulations, has been utilized on a voluntary basis as a guide by Aspire, Inc. Therefore, use of this terminology should not be understood as agreement on the part of ASPIRE, INC. that it has in the past or is now violating any federal, state or local fair employment practice laws, ordinances or regulations.

In developing and implementing this AAP, Aspire, Inc. has been guided by its established policy of providing EEO. Any goals which the agency has established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this AAP. Neither the use nor the effect of goals and timetables in the AAP is intended to discriminate in employment against any individual or group of individuals who are not themselves the beneficiaries of affirmative action. This AAP is not intended to sanction the discriminatory treatment of any person. It has been developed in strict Opportunity Commission (EEOC) (29 C.F.R Part 160).

The material set forth in this AAP is deemed to constitute trade secrets, operations information and confidential statistical date, all of which fall within the Freedom of Information Act, 5 U.S.C. 552 et. seq., and the Trade Secrets Act, 18 U.S.C. 110905 and 44 U.S.C. 3508, the disclosure of which is specifically prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

Statement of EEO Policy

It is the policy of Aspire, Inc. not to discriminate on the basis of race, color, religion, gender, gender identity, national origin, age, sexual orientation, genetic information and testing, family and medical leave, disability status, or status as a Vietnam Era Veteran or special disabled veteran, or any other characteristics protected by law, with respect to recruitment, hiring, training, transfer, promotion, and other terms and conditions of employment, provided the person is qualified to perform the work available. Furthermore, it is the policy of ASPIRE, INC. to comply with the concepts and practices of affirmative action. Meranda Leidholdt, Director of Human Resources, has been designated to administer Aspire, Inc.'s Affirmative Action Program and will monitor that program and make reports to the Executive Director and/or the Board of Directors as needed.

Accordingly, all employment decisions shall be consistent with the principle of EEO, and only valid qualifications will be required for promotion.

All other personnel actions or programs such as those involving compensation, benefits, transfers, layoffs, training, etc. will be administered in a non-discriminatory manner.

We prohibit retaliation, harassment, intimidation, threats, coercion or discrimination against individuals who:

1. Bring forth any complaint, orally or in writing, to the employer or the government, or against any individuals who assist or participates in the compliance review, hearing, or any other activity related to the administration of section 503 of the Rehabilitation Act, VEVRA, or any other federal, state, or local law requiring equal opportunity for persons with disabilities, females, veteran status, or minority classification, or of any complaint or otherwise oppose discrimination.
2. Assisting or participating in an investigation, opposing any act or practice made lawful by section 503 of the Rehabilitation Act or its implementing regulations, 41 C.F.R. Part 60-741 or any other federal, state, or local law requiring equal opportunity for persons with disabilities, females, Veteran status, or minority classification.
3. Exercising any other right protected by section 503 of the Rehabilitation Act, VEVRA, or any other federal, state, or local law requiring equal opportunity for persons with disabilities, females, veteran status, or minority classification.

Responsibility for Implementation

Affirmative Action for persons with disabilities, females, Veterans and minorities, is the responsibility of every employee of Aspire, Inc. The Affirmative Action Administrator, who is also the Director of Human Resources, is responsible for the implementation and monitoring of the affirmative action program. In carrying out the responsibility for the implementation and monitoring of the affirmative action program, the Administrator will:

1. Develop policy statements and programs, have periodic discussions with Administrators, supervisors, and employees to assure that this AAP is being fully implemented, and that they understand our obligations to prevent harassment of employees placed through affirmative action efforts.
2. Periodically review Aspire, Inc.'s personnel policies and practices along with the Employee Personnel and Advisory Committee, in an effort to identify possible problem areas and to develop and suggest possible solutions, including potential accommodation techniques where appropriate.
3. Design and implement internal audit and reporting systems that will assist in measuring the effectiveness of the Aspire Inc.'s AAP and help ensure that each location is in compliance with the Rehabilitation Act, VEVRA, their implementing regulations, or any other federal, state or local law.
4. Serve as liaison between Aspire, Inc. and federal, state, and/or local regulatory agencies in the area of EEOC/AAP.
5. Include her/his identity on all internal and external communications regarding Aspire, Inc.'s AAP.
6. Periodically keep Administrators and Supervisors informed of the latest developments in the affirmative action area pertaining to people with disabilities, females, Veterans, and minorities.
7. Inform and train all personnel involved in the recruitment, screening, selection, promotion, discipline and related processes regarding Aspire Inc.'s commitments to the Affirmative Action for people with disabilities, women, Veterans, and minorities.
8. Encourage all employees to bring EEO-related questions and complaints to the Affirmative Action Administrators attention so that, to the extent possible, complaints may be resolved internally.
9. Prepare and Complete the EEO-1 reports and other required documents.

Implementation of Affirmative Action

All applicants, and all employees of Aspire, Inc. who believe themselves to be covered by the Rehabilitation Act of 1973, 29 U.S.C. 701 et. seq., specifically 29 U.S.C. 793(a), VEVRA, or placement of incumbents in job groups 41 C.F.R. 60-2.13(e), and who wish to identify themselves as disabled, a female, Veteran, or a minority, for the purposes of Affirmative Action and proper job placement, are invited to do so utilizing the "Voluntary Affirmative Action Information form" (applicants) or the "Workforce Analysis" form (employees). A request to benefit from Aspire Inc.'s affirmative action program may be made immediately and/or at any time in the future.

Aspire Inc's personnel process will be reviewed periodically to make every good faith effort to ensure that the procedures utilized assure consideration of known applicants and employees with disabilities, females, Veterans, or minorities for job vacancies. The following are the procedures that will be used to make every effort to assure such consideration.

1. Records will be maintained regarding each known applicant with a disability, a female, a Veteran, or a minority, for the purpose of identifying each vacancy for which the applicant was considered.
2. Records of each known employee with a disability, a Veteran, a minority or a female will include identification of promotions, transfers, etc.
3. Physical and mental job qualifications will be periodically reviewed to ensure that, to the extent they may screen out qualified applicants with a disability, such qualifications are job-related for the position in question and are consistent with business necessity and/or the safe performance of the job.
4. Reasonable accommodation will be made to individuals with known physical or mental limitations. If an employee with a disability is having significant difficulty performing their job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee will be notified confidentially of the performance problem and will be asked whether the problem is related to the employee's disability. If the employee responds affirmatively, a confidential inquiry will be made of the employee as to whether he/she is in need of reasonable accommodations, the factors of business necessity and financial cost and expense will be considered among others. Further, Aspire, Inc. will consider whether, given the disability, the person is nevertheless qualified for the job.
5. Aspire, Inc. has developed specific policies and grievance procedures to assure that employees are not harassed because of disability, being a woman, veteran or a minority.

Dissemination of Policy

Aspire, Inc.'s employment practices will be reviewed periodically to determine whether personnel programs provide the necessary Affirmative Action for employment and advancement of qualified people with disabilities, women, Veterans, and minorities. Positive outreach and recruitment activities designed to effectively recruit qualified individuals with disabilities, women, Veterans, and minorities may include:

1. Communicating to all employees the agency's obligation to take affirmative action to employ people with disabilities, women, Veterans and minorities.
2. Periodically reviewing personnel procedures in an effort to assure that this AAP is being fully implemented and that good faith efforts are being undertaken to implement it.
3. Enlisting the assistance and support of recruiting agencies such as the Department of Vocational Rehabilitation and Job Services and the Department of Labor.
4. Making an effort to participate in work-study programs with local schools and/or rehabilitation agencies which specialize in training or educating people with disabilities.
5. In making hiring decisions, Aspire, Inc. will consider all applicants for all available positions for which they may be qualified when the position they applied for is unavailable.

6. Include a statement of this affirmative action plan in company newsletters on a periodic basis.
7. Inform employees and prospective employees of the agency's commitment to affirmative action for people with disabilities, women, Veterans, and minorities.
8. Inform employees that Aspire, Inc. may impose disciplinary action, up to and including termination on those who impede the implementation of the policy.
Aspire, Inc. will not tolerate harassment of any employee because of race, religion, color, gender, national origin, age, genetic information and testing, family and medical leave, disability, status as a Vietnam Era Veteran or Special Disabled Veteran, or any other characteristics protected by law.
9. This AAP will be made available for inspection by employees or applicants upon request.

Development and Execution of Affirmative Action Programs

Aspire, Inc. is committed to developing, executing, and maintaining an effective AAP. In order to make good faith efforts to assure an effective plan, we will utilize some or all of the following procedures as appropriate:

1. Aspire, Inc. will make job specifications available to members of management significantly involved in the recruitment, screening, selection and promotion process.
2. Aspire, Inc. will evaluate the total selection process on an annual basis to make good faith efforts to ensure that individuals with disabilities, women, Veterans, and minorities are not stereotyped in a manner that limits their access to jobs for which they are qualified.
3. Employees significantly involved in recruitment, selection, promotion, discipline and related personnel practices will be made aware of the agency's Equal Employment and Affirmative Action obligations regarding individuals with disabilities, women, Veterans and minorities.
4. Aspire, Inc. will make good faith efforts to reach individuals with disabilities, women, Veterans, and minorities when recruiting.

Monitoring and Reporting

Aspire, Inc. believes that one of the most important elements in effectively implementing a written AAP is an adequate internal audit and reporting system. Aspire, Inc. will implement an internal reporting system that will:

1. Measure the effectiveness of the agency's Affirmative Action Program.

2. Records of applicant flow, hires, transfers, promotions, and separations are monitored to make every good faith effort to ensure that the agency's EEO policy is carried out.
3. Indicate any need for remedial action.
4. Determine the degree to which the agency's objectives have been attained.
5. Measure the company's compliance with the specific obligations of its Affirmative Action program.
6. Where the Affirmative Action is found to be deficient, undertake necessary actions to bring the program in to compliance.

Review of Personnel Process

Aspire, Inc. will ensure that its personnel processes provide for careful, thorough and systematic consideration of the job qualifications of applicants and employees with known disabilities, women, Veterans, and minorities for job vacancies filled either by hiring or promotion.

Aspire, Inc. will ensure that its personnel practices do not stereotype disabled persons, women, Veterans or minorities in a manner which limits their access to all jobs for which they are qualified.

Aspire, Inc. will periodically review its personnel processes and make any necessary modifications to ensure that its obligations under this written AAP are carried out.

Aspire, Inc. encourages the use of the internal review procedure whereby employees who have disabilities, women, Veterans and minorities can raise any issues or claims that may arise during the course of their employment. Aspire, Inc. maintains an "open door" policy and encourages employees to discuss any such issues or claims. Aspire, Inc. also has a formal grievance policy that is available for employees to utilize if informal resolution of any claims or issues does not resolve the problem. All such matters may be brought to the attention of the Affirmative Action Administrator for assistance in their timely resolution.

This AAP will be reviewed and/or updated annually.

Nearly 82% of the jobs at Aspire, Inc. are in the EEO job group category of 'Service Workers'. Statistical analysis shows that Aspire, Inc.'s labor force closely mirrors that of Brown-Edmunds County LMA, Civilian Labor Force Statistics. Unfortunately, the counties information has not been updated since 2010.

Basing an analysis strictly on % does not present a totally accurate picture due to the fact that there are 10 or less employees in all job groups at Aspire, Inc. except 'Service Workers'.

Further analysis of Aspire Inc.'s work force data reveals additional general observations, including:

1. Analysis reveals that minorities and women are not restricted to any particular department or job.
2. Aspire, Inc.'s labor force of women exceeds that of the Brown County in all categories except, 'Laborers and Helpers. Aspire, Inc.'s labor force of minorities is underutilized in all areas.

Additional analysis of Aspire, Inc.'s personnel practices and procedures has revealed the following:

1. The composition of the work force in terms of overall numbers of minorities and women continue to reflect ASPIRE, Inc.'s commitment to EEO.
2. That Aspire, Inc. remains committed to continuing to improve its' applicant flow with respect to disabled, minorities, and Veterans.
3. Aspire, Inc. has examined and made changes to its total selection process to ensure that all personnel practices are being uniformly applied without regard to race, color, religion, gender, national origin, age, genetic information and testing, family and medical leave, disability status, status as a Vietnam era or special disabled veteran, or any other characteristics protected by law.
4. The use of Aspire, Inc.'s facilities will not be permitted on any basis inconsistent with its EEO policy.
5. All employees need to complete an in-house application to be considered for an open position. Although length of service is a factor for consideration in hiring decisions, the job related qualifications of an individual are also a factor in such decisions.
6. A review of Aspire, Inc.'s technical compliance efforts with such requirements as posting its' EEO policy, retaining applications forms and notifying suppliers, etc. has resulted in a finding that such requirements have been and will continue to be met.

Aspire, Inc. conducts an annual analysis in order to ensure that the commitment of the company to EEO and Affirmative Action is being fully implemented. Having completed such an analysis, we have continually concluded that,

1. The selection process continues to be non-discriminatory and a rating system has been put into place for interviews.
2. Transfers are decided by utilizing only non-discriminatory factors.
3. Application forms and other pre-employment documents are in compliance with federal laws and regulations.
4. Employment interviewing and screening are performed by personnel fully cognizant of Aspire, Inc.'s EEO policy.
5. The disabled, Veterans, minorities and women are not excluded from any company sponsored activities or programs, and any such programs are fully integrated.
6. No de facto segregation exists in the agency.
7. No artificial barriers resulting in overt or inadvertent discrimination exist at the agency.

8. The concepts contained in the written AAP and in Aspire, Inc.'s EEO policy have been communicated and have found acceptance at all levels of management.
9. Aspire, Inc.'s in-house on the job training and orientation used for the purpose of increasing an employee's knowledge is done consistent with the principles of EEO.
10. EEO posters developed by the federal government are prominently displayed in appropriate places throughout the agency.
11. The vendors and suppliers the agency regularly uses are informed of Aspire, Inc.'s commitment to EEO.
12. Support for and commitment to Aspire, Inc.'s EEO policy is emphasized by management.
13. Job descriptions are periodically reviewed and properly identify job-related requirements.

The Development and Execution of Action-Oriented Programs

The following are examples of the continuing action-oriented programs or procedures designed to advance Aspire, Inc.'s commitment to EEO:

1. Job specifications and job descriptions are periodically reviewed and evaluated to ensure that all required criteria are job related. They are updated as needed.
2. Recruitment sources are provided with the requisite job-related information, and thus are able to recruit qualified persons on a nondiscriminatory basis.
3. Aspire, Inc. continues to evaluate the entire selection process and make every good faith effort to select persons according to their abilities and qualifications, while recognizing its commitment to take affirmative action to remedy any underutilization of disabled, Veterans, minorities and women.
4. No job group, department, or any other delineation is closed or limited to minority, disabled, Veteran or female employees.
5. Recruitment sources and community organizations are notified of our EEO policy and are asked to refer qualified candidates for available positions.

Internal Audit and Reporting Requirements

Aspire, Inc. believes that one of the most important elements in effectively implementing a written AAP is an adequate internal audit and reporting system. Through this system, progress can be monitored and management kept continuously informed. For this purpose, Aspire, Inc. has established the following internal audit and reporting systems:

1. Records of applicant flow, hires, transfers, and separations are monitored to make every good faith effort to ensure that Aspire, Inc.'s EEO policy is carried out.

2. Progress toward meeting goals and/or timetables is measured periodically through discussions with appropriate management personnel.
3. The Affirmative Action Administrator is responsible for reviewing results periodically with appropriate management personnel.
4. When necessary, the Affirmative Action Administrator communicates with the Executive Director and/or the Board of Directors concerning recommendations to improve EEO performance.

Compliance with OFCCP's Gender Discrimination Guidelines

Aspire, Inc. complies with the sex discrimination guidelines issued by OFCCP and set forth at 41 C.F.R. Part 60-20 as follows:

1. Aspire, Inc.'s employment advertising does not express a gender preference, and employees of both genders are recruited for jobs at the agency.
2. Aspire, Inc. expressly states in its personnel policy manual, orientation binders, employment applications and elsewhere that there will be no discrimination on account of gender or gender identity.
3. Aspire, Inc. does not make any distinction based upon gender or gender identity, with regard to employment opportunities, wages, hours, benefits, or other terms and conditions of employment.
4. Aspire, Inc. does not make any distinction between married and unmarried persons of either gender.
5. Aspire, Inc. does not deny employment to women with children.
6. Aspire, Inc. provides an appropriate physical facility to both genders.
7. Aspire, Inc. does not penalize women in their terms and conditions of employment because they require time away from work for childbearing. Aspire, Inc. complies with the 1978 Pregnancy Amendment to Title VII of the Civil Rights Act, the FFMLA of 1993, and any other applicable state and federal family leave laws.
8. Aspire, Inc.'s wage schedules are not related to or based on gender or gender identity.
9. Aspire, Inc. does not discriminatorily restrict individuals of one gender to certain jobs.

Aspire, Inc. will not tolerate harassment or sexual harassment of any kind. Any complaints of this kind may be referred to the Affirmative Action Administrator or the Title IX Coordinator as well as regular supervisory channels. Any employee found to have been involved in unlawful sexual harassment will be disciplined according to agency policy, up to and including termination.

Religion and National Origin Discrimination Guidelines

Aspire, Inc. is committed to providing and ensuring EEO to all applicants and employees without regard to their religion or national origin. In addition to ensuring nondiscrimination in this respect, Aspire, Inc. will undertake the following affirmative action:

1. A review of its employment practices to determine whether members of protected religious and ethnic groups are receiving fair consideration for job opportunities at all levels.
2. Internal communication of our policy with respect to nondiscrimination on the basis of religion and national origin.
3. Periodic notification of our employees of our commitment to EEO without regard to religion or national origin.
4. Notification to recruitment sources of Aspire, Inc.'s policy regarding nondiscrimination on the basis of religion or national origin.
5. Aspire, Inc. makes every effort to accommodate the religious observances and practices of employees and prospective employees, except where it is unable to reasonably accommodate such an employees' religious observances or practices, because such accommodation would result in undue hardship in conducting its business.

Summary Statement

In conducting the foregoing analysis, setting goals, and striving to reach goals, Aspire, Inc. has been guided by its established policy of providing EEO. The goals which we have set are not intended to be rigid, inflexible quotas that must be met, but rather as targets reasonably attainable if every good faith effort is made in implementing this AAP. Neither the use nor the effect of goals in this AAP is intended to discriminate against any individual or group of individuals with respect to any employment opportunity for which he, she, or they are qualified on the basis that he, she, or they are not the beneficiaries of affirmative action themselves.

EEO Job Category	Aspire Labor Force (Oct 31, 2019)		Civilian Labor Force Brown County (EEO Tabulation 2006-2010)	Underutilized (yes or no)
	#	%		
Exec/Sr Officials & Mgrs				
Wh. Male	1	16.66%	63.6%	No
Wh. Female	4	66.66%	31%	No
Minority Male	0	0%	2.7%	Yes
Minority Female	0	0%	2%	Yes
Disabled White Female	1	16.66		No
Professionals				
Wh. Male	0	0%	32.8%	Yes
Wh. Female	5	100%	57.8%	No
Minority Male	0	0	3.8%	Yes
Minority Female	0	0	4.8%	Yes
Administrative support				
Wh. Male	3	37.5%	18.8%	No
Wh. Female	3	37.5%	71.8%	No
Minority Male	--	--	2.4%	Yes
Minority Female	--	--	5.4%	Yes
Disabled White Female	2	25%	--	No
Service Workers				
Wh. Male	7	7%	23.1%	Yes
Wh. Female	66	66%	59.5%	No
Minority Male	1	1%	5.8%	Yes
Minority Female	11	11%	9.7%	Yes
Disabled Minority Female	2	2%	7.5%	Yes
Disabled White Female	10	10%	11.5%	Yes
Disabled White Male	2	2%	12.8%	Yes
Veterans M & F	1	1%	--	Yes
Sales Workers				
Wh. Male	--	--	50.2%	Yes
Wh. Female	1	100%	43.2%	No
Minority Male	--	--	1.7%	Yes
Minority Female	--	--	4%	Yes
Operatives				
Wh. Male	0	0%	57.7%	Yes
Wh. Female	1	100%	24.3%	No
Minority Male	--	--	10%	Yes
Minority Female	--	--	6.2%	Yes
Laborers and Helpers				
Wh. Male	1	33.33%	71.3%	Yes
Wh. Female	0	--	13.7%	Yes
Disabled White Male	2	66.66%	--	No
Minority Male	--	--	11.4%	Yes
Minority Female	--	--	2.4%	Yes

GOALS

Aspire, Inc. will increase numbers of minority men and women, veterans and disabled employees.

Objective – Aspire, Inc. will actively recruit Veterans, disabled, and minority employees by requesting recruitment sources to refer qualified applicants.

Objective – Aspire, Inc. will continue to evaluate the entire selection process and make every good faith effort to select persons according to their abilities and qualifications, while recognizing its commitment to take affirmative action to remedy any underutilization of minorities, Veterans, or disabled. Our goal is to have Veterans at 8% of each category, and Disabled Employees at 7% of each job category.

Objective - In the area of service workers, Aspire, Inc., Inc. averages between 20-25 openings at any given time during the year. As positions are available, commitment will be made to take affirmative action to remedy any underutilization of any category.

EEO Job Category	Current				
	Total	Minority	Female	Veterans	Disabled
Exec/Sr Officials & Mgrs	6	0	5	0	1
Professionals	5	0	5	0	0
Administrative support	8	0	3	0	2
Service Workers	100	15	89	1	12
Sales Workers	1	0	1	0	0
Laborers & Helpers	3	0	0	0	2

EEO Job Category	Goal			8%	7%
	Total	Minority	Female	Veterans	Disabled
Exec/Sr Officials & Mgrs	6	1	5	0	1
Professionals	5	1	3	0	1

Administrative support	8	1	6	0	1
Service Workers	120	10	90	8	10
Sales Workers	1	1	1	0	0
Laborers and Helpers	2	0	0	0	1