



2019

ANNUAL REPORT

AFFIRMATIVE ACTION DIVISION

Department of Civil Rights · Affirmative Action Division
210 Martin Luther King, Jr. Blvd., Room 523 · Madison, WI 53703
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Introduction

The Affirmative Action Division is responsible for advancing the City of Madison’s vision of Our Madison: Inclusive, Innovative & Thriving through ensuring contracting equity and workforce equity for the City of Madison as well as its contractors. This division furthers many of the City’s values and is responsible for a wide range of activities and compliance for internal city departments as well as city contractors. We partner with many community partners, city agencies, and the community to accomplish this goal. The work of the Division is guided by Chapter 39.02 of the Madison General Ordinances.

In late 2018 and early 2019 the Department of Civil Rights went through our own visioning process and we are proud of our new slogan “Strong and Compassionate Leaders for Justice.” The Affirmative Action Division strives to meet this model in our everyday activities and actions.

This was a year of change and transition for the Affirmative Action Division. We hired a new Contact Compliance Specialist Juan Pablo Torres Meza in February 2019. Our Affirmative Action Specialist unexpectedly passed away, the Affirmative Action Manager transitioned out of the organization unexpectedly, and another Contract Compliance Specialist transitioned out of the organization unexpectedly. For a small team, these personnel changes were quite impactful. In June 2019, Melissa Gombar began as the interim Affirmative Action Manager and she was permanently hired in September 2019. Saran Ouk, Contract Compliance Specialist and Tracy Lomax, Affirmative Action Specialist were hired in August.

- » Melissa Gombar – Affirmative Action Manager
- » Tracy Lomax – Affirmative Action Specialist
- » Martha White – Contract Compliance Specialist
- » Juan Pablo Torres Meza – Contract Compliance Specialist
- » Saran Ouk – Contract Compliance Specialist
- » Julie Austin – Administrative Assistant
- » Lisa Jameson – Clerk Typist

Our key accomplishments for 2019 were hiring, onboarding, and training a brand new staff. We are excited to highlight the work we accomplished in 2019 despite all the changes in personnel, as well as lay out our plans for the future.

Sincerely,

Affirmative Action Division

City of Madison
Department of Civil Rights
“Strong and Compassionate Leaders for Justice”

- We are drivers, our compassion drives our passion.
- We remove barriers by creating inclusion and meaningful access to resources for all.
- We address discrimination by educating, investigating, and taking corrective action.
- We advance shared prosperity by leveraging resources equitably.

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INSPIRED ACTIONS
start here

EXCELLENCE
We come together to celebrate wins and the advancement of social justice.

INVOLVEMENT
With intention, proactively building trust in the community and connecting to all.

RESULTS
Success is the satisfaction of our community and colleagues. We are accountable, and seek accountability from others.

NOTICE
We listen, are empathetic, present, and transparent in our communications.

STANDARDS
Our decisions are guided through planning, data, and are consistently delivered with professionalism.

I CAN
We are part of the solution; with optimism, we actively seek to solve complex civil rights problems and end discrimination.

PRINCIPLES
We vigorously pursue the protection of civil rights and potential for all.

Education Access Accountability

RESULTS EXCELLENCE INVOLVEMENT NOTICE STANDARDS I CAN PRINCIPLES

Executive Summary and Key Accomplishments

Key accomplishments of 2019 include:



STAFFING

Hiring, onboarding, and training of

4 of 7

Affirmative Action Division staff members, including the manager.



Raise PROGRAM

805 jobs were posted on our website. Zero referrals were made by our 16 community partners.

805 JOBS POSTED



CITY OF MADISON EQUITABLE WORKFORCE PLAN AND STRATEGIES

We publish an annual report that can be viewed online for further data. We are excited that the City of Madison has reached its goals for people of color in all but one category.



AFFIRMATIVE ACTION COMMISSION

We recruited, onboarded, and trained three new Affirmative Action Commissioners and began meeting regularly after months of missed meetings due to lack of quorum.



KEY PROJECTS

Contracting Equity, Judge Doyle Square Compliance, 2015 Disparity Study Continuity.



KEY PARTNERSHIPS

WHEDA, Unified Certification Program.



FUTURE VISION & EFFORTS

Civil Rights Alliance, Data Automation, Policy Updates, Work Planning and Performance Measures, Expand Good Faith Efforts.



TARGETED BUSINESS ENTERPRISE PROGRAM

\$1,667,687.15 or 0.6% of all City of Madison dollars were invested in targeted businesses.

0.6%

CONSTRUCTION PROJECT COMPLIANCE FOR TARGETED BUSINESSES

7.22%, or \$3,282,533.35 of all City of Madison construction dollars were invested in Targeted Businesses.

7.22%

CONSTRUCTION PROJECT COMPLIANCE FOR WORKFORCE DEMOGRAPHICS

14.9% of all hours worked on City of Madison construction projects in 2019 were performed by people of color. The largest representation of this group was Latinos at 10.1%. 2.1% of all hours worked on City of Madison construction projects in 2019 were performed by women.

14.9%

CONTRACTOR AND VENDOR AFFIRMATIVE ACTION PLANS

Affirmative Action Division Staff received a total of 389 Affirmative Action Plan Applications or Exemptions from contractors and vendors. The average time to approve these plans is 60 days for Plans and 0 days for exemptions. Five companies were invited to a hearing after being found in noncompliance for their 2018 Affirmative Action Plan. Two were debarred from doing business with the City of Madison for two years or until they had an approved plan. Three more companies were debarred and were also ordered to pay liquidated damages to the City of Madison.

389

Targeted Business Enterprise Program

Background & Purpose

The City of Madison Department of Civil Rights Affirmative Action Division certifies businesses at no cost to the applicant. This ensures an availability of subcontractors available to diversify city spending on construction projects, procurement, and consulting. The types of Targeted Businesses that certified includes:

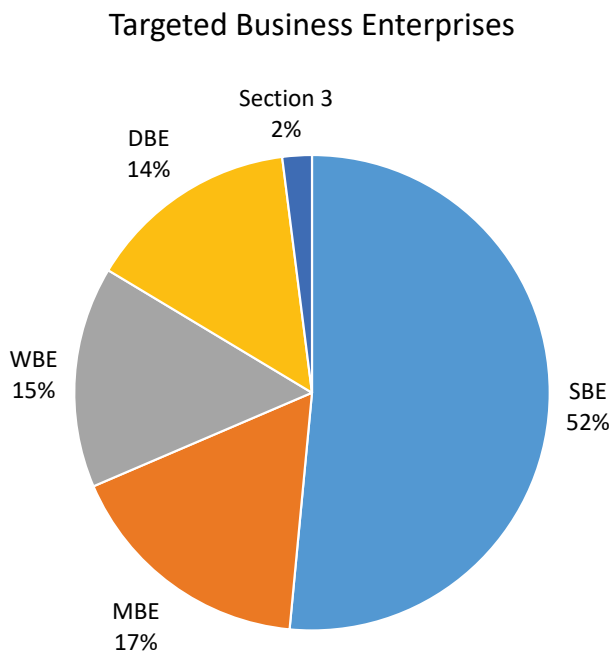
- » Small Business Enterprises (SBE)
- » Minority Business Enterprises (MBE)
- » Women Business Enterprises (WBE)
- » Disadvantaged Business Enterprises (DBE)
- » Section 3

Depending on the funding source for the type of contract the City of Madison is working on, the Targeted Business Enterprise goal will vary. For example, for City of Madison only funded projects, we set Small Business Enterprise Goals. For Federally funded projects, we set goals for Minority, Women, Disadvantaged, or Section 3 enterprises.

Actions & Results

In 2019, the City of Madison spent \$1,667,687.15 or 0.6% (not including subcontracting dollars) on businesses that were certified as Targeted Business Enterprises. This includes payments to prime contractors, vendors, consultants, etc.

There are 179 total Targeted Business Enterprises, with the breakdown as follows:



Construction Project Compliance

Construction Project Targeted Business Goals

Background & Purpose

We ensure that public works and non-public works prime contractors provide the maximum feasible opportunity for Targeted Business Enterprises to work with them as subcontractors. For each project, we examine the scopes of work and set a unique project goal for Targeted Business Enterprises. If a contractor is unable to meet the Targeted Business Enterprise goal, they must present documentation that shows Good Faith Efforts ([“Appendix A: Good Faith Efforts: Targeted Business Utilization”](#) on page 12), that they tried their hardest to contract with diverse businesses.

Actions & Results

A total of 7.22%, or \$3,282,533.35 was paid to Targeted Business Enterprises in on construction projects in 2019. The following data represents 39 contracts that started in 2019, and have been finalized. \$45,436,333.27 was invested in these contracts in total. 2019 ongoing contracts were not included in the analysis for this report. Note that projects were ineligible for a goal to be set if they cost less than \$100,000.

Total Dollar Amount Paid	\$45,436,333.27
Dollar Amount Paid to TBEs	\$3,282,533.35
TBE Participation	7.22%
Total Contracts	39
Contracts Where Goal was Achieved	24
Contracts Where Goal Was Not Achieved	12
Contracts Not Eligible for Goal	3

Construction Project Workforce Labor Goals

Background & Purpose

The City of Madison wants the labor force working on each project to be diverse as possible. For every project we would like to see racial ethnic utilization of 7% of the total hours worked on a project, and female utilization of 6% of total the hours worked on a project. If these percentages are not met, contractors must provide documentation of good faith efforts ([“Appendix B: Good Faith Efforts: Affirmative Action Plan”](#) on page 13), to show they did everything they could to diversify the project’s assigned workforce. It should be noted these are not quotas. Our Contract Compliance Specialists monitor each project on a monthly basis to ensure these targets are being met. If not met, they review the good faith efforts.

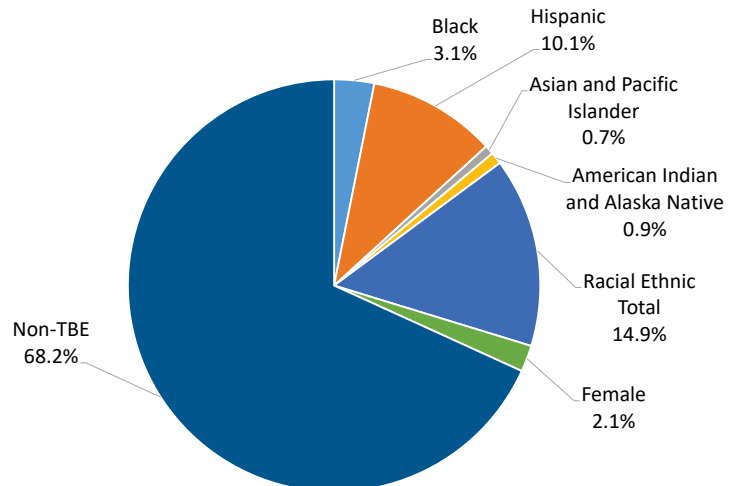
Actions & Results

According to the [Bureau of Labor Statistics](#), only 9.9% of construction professionals are women. In regard to race, 30.7% of professionals in the industry are Hispanic or Latino, 6.2% are black, and a staggering 2% are Asian.

The below data represents hours worked in contracts during 2019. Of note:

- » 14.9% of all hours worked on City of Madison construction projects in 2019 were performed by people of color. The largest representation of this group was Latinos at 10.1%.
- » 2.1% of all hours worked on City of Madison construction projects in 2019 were performed by women. This is well under the 6% goal.

2019 Public and Non-Public Works Demographic Utilization



Contractor and Vendor Affirmative Action Plans

Background & Purpose

We are proud to be one of the only city jurisdictions in the United States that requires an Affirmative Action Plan as a part of its contracting regulations. The Affirmative Action Plan broadens our compliance to ensuring our contractors implement workforce practices that increase and sustain diversity in their overall workforce. The Affirmative Action Plan must be renewed every two years and must remain active throughout the course of any project. Contractors are exempt from filling out an Affirmative Action Plan if they have 14 or fewer employees. They are also exempt if they receive less than \$50,000 per calendar year from the City of Madison. (This amount was raised to \$50,000 from \$25,000 in 2018.)

We expect our vendors to meet the following targets within their total workforce.

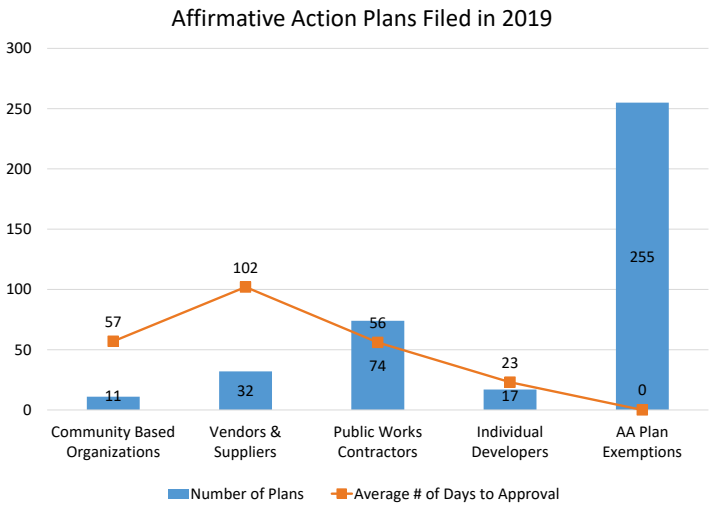
	Goal for Women	Goal for People of Color
Community Based Organizations	41.52%	7.44%
Vendors & Suppliers	41.52%	7.44%
Public Works Contractors	7%	6%
Individual Developers	7%	6%

If vendors do not meet these goals, Good Faith Efforts ([“Appendix B: Good Faith Efforts: Affirmative Action Plan” on page 13](#)), must be submitted and approved as a part of their plan. The Affirmative Action Division’s hope is that through the implementation of Good Faith Efforts, our contractors will be able to eventually meet these workforce goals.

There were a total of 389 Affirmative Action Plans or Exemptions filed in 2019. The type and average amount of time to approve is reported below.

	Number of Plans	Average # of Days to Approval
Community Based Organizations	11	57
Vendors & Suppliers	32	102
Public Works Contractors	74	56
Individual Developers	17	23
AA Plans Subtotal	134	60
Exemption: 14 or fewer*	174	0
Exemption: Less than \$25,000*	81	0
AA Plan Exemptions Subtotal	255	0
TOTAL	389	21

* Automatic Approval



Actions & Results

In 2019, we reviewed the financial records for vendors that earned \$25,000 or more with the City of Madison in 2018. It was found that 222 contractors did not have an Affirmative Action Plan on file, per city contracting and purchasing rules, and in violation of Madison General Ordinance 39.02.

After notifying these contractors, all were able to submit an Affirmative Action Plan and get them approved except for five companies. These five companies were invited to a hearing. Two were debarred from doing business with the City of Madison for two years or until they had an approved plan. Three more companies were debarred and were also ordered to pay liquidated damages to the City of Madison.



Raise Program

Background & Purpose

The City of Madison funds several community based organizations that conduct employment training in the areas of construction. We wish to leverage this funding and these resources with the contractors that we do business with. It is now a part of every contract that contractors must offer interviews to qualified applicants referred by these community based organizations that meet minimum qualifications.

Actions & Results

805 jobs were posted to the Raise website in 2019. We have identified 16 community partners to refer employees to the contractors.

There were no referrals by our 16 community partners in 2019. We believe that we will need to relaunch this program in the future when we have more data automation through a contract compliance system that allows for staff time for outreach.



Referrals & Interviews for Sustainable Employment

City of Madison Equitable Workforce Plan and Strategies

Background & Purpose

Each year we publish¹ an update to the City of Madison Affirmative Action Plan, where key metrics are published for our internal strategies to recruit and maintain a diverse workforce. In this report we highlight strategies including the Affirmative Action Division's monitoring of the City of Madison hiring process, AASPIRE internship program results, and Workplace Harassment and Discrimination Policy Violations. Of note for this annual report is that we track demographics of each city department on a quarterly basis to assist us in achieving our own internal equitable hiring goals.

Actions & Results

This chart² shows the number of employees working in each job type across the City of Madison. As of October 3, 2019 we have almost reached parity for employees of color within our organization.

City Wide Job Family Availability - HOURLY											
The Annual Placement Goals are determined with an underutilization analysis of incumbency and relevant labor market availability of qualified women or people of color (known as minorities in the past). All selection decisions are made in a nondiscriminatory manner and a placement goal is not justification for selecting an individual based on their protected class. Source: Permanent Employees & US Census 2010 EEO Data Tool Madison, WI (MSA)											
	Total # of Employees	# of Female Employees	Female Incumbency	Female Goal*	Availability Met?	Difference to goal (+/-)	# of Racial Ethnic Employees	Racial Ethnic Incumbency	Racial Ethnic Goal*	Availability Met?	Difference to goal (+/-)
1 - Officials & Administrators	0	0	N/A	43.90%	N/A	N/A	0	N/A	6.20%	N/A	N/A
2 - Professionals	10	6	60.00%	53.80%	Yes	6.20%	1	10.00%	9.80%	Yes	0.20%
3 - Technicians	22	6	27.27%	50.80%	No	-23.53%	6	27.27%	10.80%	Yes	16.47%
4 - Protective Workers	88	35	39.77%	28.10%	Yes	11.67%	10	11.36%	8.10%	Yes	3.26%
5 - Paraprofessionals	28	14	50.00%	57.90%	No	-7.90%	7	25.00%	9.00%	Yes	16.00%
6 - Administrative Support	264	158	59.85%	62.00%	No	-2.15%	45	17.05%	8.20%	Yes	8.85%
7 - Skilled Craft Workers	187	47	25.13%	6.30%	Yes	18.83%	20	10.70%	5.90%	Yes	4.80%
8 - Service Maintenance	173	54	31.21%	43.30%	No	-12.09%	45	26.01%	13.40%	Yes	12.61%
TOTAL	772	320					134				

City Wide Job Family Availability - PERMANENT											
The Annual Placement Goals are determined with an underutilization analysis of incumbency and relevant labor market availability of qualified women or people of color (known as minorities in the past). All selection decisions are made in a nondiscriminatory manner and a placement goal is not justification for selecting an individual based on their protected class. Source: Permanent Employees & US Census 2010 EEO Data Tool Madison, WI (MSA)											
	Total # of Employees	# of Female Employees	Female Incumbency	Female Goal*	Availability Met?	Difference to goal (+/-)	# of Racial Ethnic Employees	Racial Ethnic Incumbency	Racial Ethnic Goal*	Availability Met?	Difference to goal (+/-)
1 - Officials & Administrators	78	25	32.05%	43.90%	No	-11.85%	10	12.82%	6.20%	Yes	6.62%
2 - Professionals	467	217	46.47%	53.80%	No	-7.33%	67	14.35%	9.80%	Yes	4.55%
3 - Technicians	157	35	22.29%	50.80%	No	-28.51%	15	9.55%	10.80%	No	-1.25%
4 - Protective Workers	932	200	21.46%	28.10%	No	-6.64%	182	19.53%	8.10%	Yes	11.43%
5 - Paraprofessionals	159	118	74.21%	57.90%	Yes	16.31%	26	16.35%	9.00%	Yes	7.35%
6 - Administrative Support	203	149	73.40%	62.00%	Yes	11.40%	37	18.23%	8.20%	Yes	10.03%
7 - Skilled Craft Workers	370	20	5.41%	6.30%	No	-0.89%	42	11.35%	5.90%	Yes	5.45%
8 - Service Maintenance	512	98	19.14%	43.30%	No	-24.16%	157	30.66%	13.40%	Yes	17.26%
TOTAL	2878	862					536				

REPORT GENERATED: 10/3/2019

¹ cityofmadison.com/employeeenet/civil-rights/hiring/equitable-workforce-affirmative-action-plan

² cityofmadison.com/employeeenet-civil-rights/documents/JobFamilyAvailability_20191003.pdf



City of Madison Affirmative Action Commission

Background & Purpose

The City of Madison Affirmative Action Commission reviews, approves and recommends the city-wide affirmative action plan as proposed by the Affirmative Action Director; advises affected and/or other under-represented groups of their rights under the Affirmative Action Program; disseminates information and educates citizens to a greater understanding and practice of affirmative action employment for all affected and/or other under-represented groups; renders, from time to time, but not less than once a year, written reports of its progress, activities and recommendations to the mayor and Common Council; recommends and reviews such rules and regulations as may be necessary to promulgate the city's Affirmative Action Program.

Actions & Results

This body had several vacancies and as such had challenges reaching quorum in early 2019. Staff recruited, onboarded, and trained 3 new commissioners. After recruitment to fill vacancies by Affirmative Action Division staff, the Commission met in August 2019 for the first time since January 2019 and they now have a work plan and goals in place for 2020 including reviewing and updating the Affirmative Action Ordinance, strengthening communications to the common council, and perform more outreach.

Key Projects

Contracting Equity

On June 17, 2019 the Racial Equity and Social Justice team collaborated with Affirmative Action to hold a daylong conference “Framework for Contracting Equity.” This event featured speakers that are experts in government contracting equity best practices such as Godwin Amegashie and Randy Crump. Attendees included City of Madison staff responsible for purchasing, contracting, and budgeting.




As a result of this conference Mayor Satya Rhodes-Conway formed a Contracting Equity Team. Executive Sponsors of the Team include Department of Civil Rights Director Norman Davis and Finance Director David Schmiedicke. This team’s main purpose will be to create data efficiencies to better track city spending with diverse businesses.

Racial Equity & Social Justice Initiative

Framework for Contracting Equity

Presented by SEED Consulting LLC

▶ June 17, 2019, 9:30-4:00 pm | Room 215 Madison Municipal Bldg. ◀

Presenters	Framework for Contracting Equity
 <p>Godwin Amegashie holds a Master's of Science in business from the U.W. School of Business with majors in finance, investment, banking, and international business. He is a fellow of the Economic Development Institute of the World Bank in Washington D.C.</p>	This is a comprehensive training recommended for City staff who work with contracting or budgeting. Topics include: <ul style="list-style-type: none">■ Historical efforts of contracting equity■ City of Madison contracting■ Best contracting practices■ Creating an equity-enabling environment Staff will come away with concrete information they can apply to their daily work. Lunch is provided.
 <p>Randy Crump, CEO, Prism Technical Management & Marketing Services, LLC. Under Crump's leadership, Prism managed the construction of Miller Park, and was part of a major restoration effort at the home of the Green Bay Packers.</p>	
 <p>Racial Equity & Social Justice Initiative</p>	Save your seat! Register NOW: www.cityofmadison.com/isevents/event_detail.cfm?eid=2093

Judge Doyle Square

The Judge Doyle Square (JDS) site is bounded by Martin Luther King, Jr. Boulevard on the west, Doty Street on the north, Wilson Street on the south and on the east by a group of buildings that front mainly on King Street. Pinckney Street runs through the site and defines Block 88 from Block 105. The redevelopment of this land has been of great interest to the community. The Affirmative Action Division worked with the City Attorney’s office to negotiate compliance requirements on the private development.

2015 Disparity Study Continuity

Staff continue to review the [2015 Public Works Disparity Study](#) recommendations and align work to advance those strategies. In 2020 and 2021, staff continue to will develop an in-depth plan that will layout a structured strategy to respond to each recommendation.





Key Partnerships

Wisconsin Housing & Economic Development (WHEDA)

The Affirmative Action Division partners with the Wisconsin Housing & Economic Development Authority (WHEDA) for compliance on several projects. Projects that receive both State WHEDA funding and City of Madison funding comply to WHEDA Emerging Business Enterprise (EBE) goals. These projects have an automatic 25% EBE goal, and we allow our contractors working with WHEDA funds to hire EBE subcontractors.

Unified Certified Program (UCP)

The City of Madison is a member of the Wisconsin Unified Certification Program (WisUCP), which is comprised of Milwaukee County, Wisconsin Department of Transportation, City of Madison and Dane County. If a business is certified as a Disadvantaged Business Enterprise (DBE) with any of the four WisUCP certifying member organizations, the business is automatically registered with all four agencies, and eligible to apply for interstate U.S. DOT UCP certification nationwide.

Future Vision & Efforts

Civil Rights Alliance

The Affirmative Action Division plans to take a key coordination role in the development of a Wisconsin-wide Civil Rights Alliance. The Affirmative Action Division and Department of Civil Rights will be convening civil rights practitioners and key community partners to create an alliance to leverage the collective power of our organizations, provide networking opportunities, and advance contracting equity and civil rights best practices throughout the State of Wisconsin.

Data Automation

The Affirmative Action Division is working to automate our compliance and data systems to create efficiencies. We have begun to meet with our Information Technology department to plan for an electronic compliance system.

Policy Updates

The Multicultural Affairs Committee and Women's Initiatives Committee conducted an employee survey that indicated a need to update Administrative Procedure Memoranda 3-5: Prohibited Harassment and Discrimination policy.

Additionally, there are updates that are needed to MGO 39.02, and Affirmative Action Division staff will assist the Affirmative Action Commission on this matter in 2020 and 2021.

Work Planning and Performance Measures

The Affirmative Action Division will develop a 2020 work plan and in 2021 the work plan will have performance measures added to ensure program functionality, efficiency, and impact.

Expand Good Faith Efforts

We want to expand the menu of Good Faith Efforts for contractors if they do not meet workforce goals. One tool that is available is the Equitable Hiring Tool, developed by the City of Madison for its own hiring practices. We want to explore allowing this and other evidence-based hiring practices when contractors do not reach workforce or affirmative action targets.



Appendix A: Good Faith Efforts: Targeted Business Utilization

Projects for which the City of Madison has provided financial assistance are covered by **Section 39.02 of the Madison General Ordinances**. This means that the developer and his/her prime contractor are required to take all necessary affirmative steps to assure that Small Business Enterprises (SBEs), including those owned and operated by women and minorities, are provided the maximum feasible opportunity to participate on such projects, and are used whenever possible. Such steps include, but are not limited to:

- 2.4.1.1 Attendance at the pre-bid meeting.
- 2.4.1.2 Using the City of Madison's directory of certified SBEs to identify SBEs from which to solicit bids. The City of Madison SBE Directory is available at: <https://www.cityofmadison.com/civil-rights/contract-compliance/targeted-business-enterprise-programs/directories>
- 2.4.1.3 Assuring that SBEs are solicited whenever they are potential sources.
- 2.4.1.4 Referring prospective SBEs to the City of Madison Affirmative Action Department for certification.
- 2.4.1.5 Dividing total project requirements into smaller tasks and/or quantities, where economically feasible, to permit maximum feasible SBE participation.
- 2.4.1.6 Establishing delivery schedules, where requirements permit, which will encourage participation by SBEs.
- 2.4.1.7 Providing SBEs with specific information regarding the work to be performed.
- 2.4.1.8 Contacting SBEs in advance of the deadline to allow such businesses sufficient time to prepare a bid and engage in negotiation.
- 2.4.1.9 Negotiating directly with SBEs, including those which volunteer a bid.
- 2.4.1.10 Utilizing the bid of a qualified and competent SBE when the bid of such a business is deemed reasonable, although not necessarily low.

[cityofmadison.com/civil-rights/contract-compliance](https://www.cityofmadison.com/civil-rights/contract-compliance)

Appendix B: Good Faith Efforts: Affirmative Action Plan

Acceptable Affirmative Action Good Faith (Recruitment) Efforts

This is a description to assist all potential City contractors, including public works companies, vendors/suppliers and community based organizations (CBO). The following outlined efforts are required to be provided with any Affirmative Action (AA) Model Plan submission whenever any contractor is not meeting City AA goal(s).

Contractors underutilizing racial/ethnic minorities and/or women, are required to provide current documentation of at least three (3) of the following types of recruitment efforts:

Your company is responsible for research and resources necessary to demonstrate these efforts. Please be reminded that all employment-related communications must include the verbatim language of “Affirmative Action/Equal Opportunity Employer.”

1. Copies of TWO (2) new targeted AA outreach correspondences (e.g., letters, emails, feature advertisements, documentation of in-person meetings), specifically requesting referral of minority and/or female applicants who are underutilized in your workforce, and directed to related diversity organizations. Also, include any organizations’ responses, if received.
2. Copies of documentation demonstrating your participation in, or registration for, a diversity- focused job fair with a plan for active outreach to under-utilized AA group members.
3. Copies of documentation showing your active participation in diversity-focused apprenticeship or internship programs. (This includes training, advanced skills and apprentice education programs with the intent of increasing racial or gender equity utilization in your workforce.)
4. Copies of documentation or description of increased inclusion of under-utilized AA group members into your hiring process (e.g., resume reviewers, interview panelists, employment or labor management group members, etc.); AND/OR
5. Workforce Analysis and Goals table documenting net increase(s) in the overall employment percentage of your under-utilized AA group(s), demonstrating AA hiring progress from the prior year or your last submission.

(Please note that the City does not require hiring of minorities or females or any sort of “quotas” for any Plan to be approved. If your company has indeed increased utilization of targeting AA employees, that increase serves, however, as one (1) acceptable good faith AA effort.)

cityofmadison.com/civil-rights/contract-compliance



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