

**AFFIRMATIVE ACTION PROGRAM  
FOR  
INDIVIDUALS WITH DISABILITIES**

Municipality of Anchorage

Plan Year: 1/1/2023 to 12/31/2023

## **CONTACT INFORMATION**

Contractor: Municipality of Anchorage. Hereinafter,  
"Anchorage" or "MOA".  
Chief Equity Officer: Uluaio "Junior" Aumavae  
Chief Human Resource Officer (Acting): Raylene Griffith  
Executive Director Office of Equal Opportunity: Erica Barry

**EQUAL EMPLOYMENT OPPORTUNITY POLICY**  
**41 CFR Section 60-741.44(a)**

It is MOA policy to provide equal employment and advancement opportunities to all qualified individuals. To achieve this goal, Anchorage is dedicated to taking affirmative action to employ and advance in employment individuals with disabilities. All personnel actions – including compensation, benefits, recruitment, hiring, training, and promotion of persons in all job titles – are administered without regard to disability status, and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

1. Filing a complaint;
2. Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of 38 USC Section 4212, Section 503 of the Rehabilitation Act of 1973, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities;
3. Opposing any act or practice made unlawful by 38 USC Section 4212 Section 503 of the Rehabilitation Act of 1973, or any other federal, state or local law requiring equal opportunity for individuals with disabilities; or
4. Exercising any other right protected by 38 USC Section 4212, Section 503 of the Rehabilitation Act of 1973.

This EEO policy has the full support of MOA's top management. Consistent with AMC 3.20.140(2), responsibility for implementation of this EEO policy has been assigned to the MOA's EEO Coordinator. Furthermore, Anchorage has designed and implemented an audit and reporting system to monitor and maintain its compliance with the aforementioned Acts.

A copy of the Equal Employment Opportunity statement that reaffirms Anchorage's commitment to individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability.

**HARASSMENT**  
**41 CFR Section 60-741.44(e)**

Policy & Procedure 40-38 prohibits discrimination and harassment of “...employees, applicants, or interns because of their race, color, religion, national origin, age, sex, sexual orientation, gender identity, marital status, or *physical or mental disability*, or other protected class under law...”

**EXTERNAL DISSEMINATION OF POLICY**  
**41 CFR Section 60-741.44(f)**

Anchorage undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit individuals with disabilities, which include the following:

- Anchorage incorporates the Equal Opportunity Clause regarding individuals with disabilities in its purchase orders, leases, and contracts as required by law, executive order, and regulation. A written notification of the Equal Opportunity Policy (“EEO Policy”) is sent to all subcontractors, vendors, and suppliers, requesting appropriate action on their part.
- Anchorage notifies all applicants of the EEO policy. Application forms affirm Anchorage's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.
- Outreach and recruitment activities Anchorage may undertake, as needed, may include enlisting the assistance and support of one or more of the following persons and organizations in recruiting persons with disabilities, and developing on-the-job training opportunities for them, in order to fulfill its commitment to provide them equal employment opportunity:
  - The relevant State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the MOA area;
  - The Employment One-Stop Career Center (One-Stop) or American Job Center nearest the MOA;
  - The Department of Veterans Affairs Regional Office nearest the MOA ([www.va.gov](http://www.va.gov));
  - Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) ([www.earnworks.com](http://www.earnworks.com));
  - Local Employment Network (EN) organizations listed in the Social Security Administration's Ticket to Work Employment Network Directory ([www.yourtickettowork.com/endir](http://www.yourtickettowork.com/endir));
  - Local disability groups, organizations, or Centers for Independent Living (CIL) in or near the Anchorage area;
  - Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and/or
  - Private recruitment sources, such as professional organizations or employment placement services, that specialize in the placement of individuals with disabilities.
- Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-ups with these resources and feedback on disposition of applicants are conducted when appropriate.
- Meaningful contacts may be established with organizations that assist individuals with disabilities for such purposes as technical assistance, referral of potential employees, and assistance concerning proper placement, recruitment, training, and reasonable accommodations for individuals with disabilities.
- Individuals with known disabilities are considered for all available positions for which they qualify and for which they have applied.

**ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS**  
**41 CFR Section 60-741.44(f)(3)**

As explained in the 2022 Affirmative Action Plan, the MOA was not collecting self-identification of disability data from applicants and employees until October 2021. In 2021 the utilization of individuals with disabilities was 0.4%. As of January 2023, the utilization of individuals with disabilities is 2.3%. Although, this percentage is well below the federally established utilization goal of 7.0% of the workforce, the MOA observed a 460% increase in individuals with disabilities from ten (10) in 2021 to fifty-six (56) in 2023.

Outreach during 2022 primarily consists of advertising vacancies to the public and current MOA employees through the MOA’s recruiting website. Table 1 displays the results of this outreach.

Table 1

Total Applicants (All Job Groups)	No Disability		Disability		Total Placements (Hires and Promotions)	No Disability		Disability	
5299	4779	90.19%	520	9.81%	506	452	89.33%	54	10.67%

9.81% of all applications self-identified as experiencing a disability. This is encouraging as this percentage is greater than the presumed availability of 7.0%. In addition, 54 individuals experiencing disabilities were hired or promoted. This amounted to 10.67% of all placements. Again, this is encouraging as this percentage of placements is greater than the presumed availability of 7%.

Outreach/Recruitment Activity	Location	Date	Description	Evaluation
Advertising vacancies on MOA recruiting website	Anchorage	1/1/2022 to 12/31/2022	Generally advertising vacancies to the public and MOA employees.	Effective. 9.81% of applicants identified as experiencing a disability. 54 were hired or promoted. 10.67% of all placement actions.
State of Alaska Division of Vocational Rehabilitation	Anchorage	March and April 2022	Provided lists of vacancies to Rehabilitation Counselors to refer qualified applicants.	Not effective. Received no referrals from DVR.

Criteria for Evaluation:

1. Did the activity attract qualified applicants who are disabled?
2. Did the activity result in the hiring of individuals with disabilities?
3. Did the activity expand Contractor's outreach to individuals with disabilities in the community?

**INTERNAL DISSEMINATION OF POLICY**  
**41 CFR Section 60-741.44(g)**

Anchorage has developed the following internal procedures to communicate its commitment and obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory, and other employees, and to encourage such persons to take the necessary actions to meet the MOA's obligation.

- Anchorage Notices. The EEO policy statement is posted on employee bulletin boards and/or is posted electronically in a manner and place that ensures individuals with disabilities are informed of its contents. This notice states the name of the EEO Coordinator, communicates top-level management's support of this policy, and explains to whom questions, comments, or complaints should be directed. A statement is included that employees are protected from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation under the previously mentioned Acts. All required state and federal EEO notices also are posted on bulletin boards.
- Union Contracts. A non-discrimination clause is included in any union contract and all such contracts are reviewed to ensure they are non-discriminatory. Anchorage notifies union officials and/or employee representatives of its policy and requests their cooperation.
- Other procedures that may be implemented as needed include:
  - Discussing Anchorage's overall commitment, top-level management support, and implementation of the Affirmative Action Plan with management personnel, making clear the Mayor's support for the plan;
  - Informing all employees and prospective employees of Anchorage's commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities;
  - Publicizing Anchorage's affirmative action policy in local or state newspapers, magazines, annual reports, the MOA website, the Anchorage Municipal Code, and/or other media;
  - Thoroughly discussing the policy during employee orientation and in management training programs; and/or
  - Including individuals with disabilities among the employees who are featured in employee handbooks or similar publications for employees.



**AUDIT AND REPORTING SYSTEM**  
**41 CFR Section 60-741.44(h)**

The Human Resources Department monitors utilization goal progress and prepares quarterly Affirmative Action Program audit reports.

## **RESPONSIBILITY FOR IMPLEMENTATION**

### **41 CFR Section 60-741.44(i)**

Erica Barry and Raylene Griffith will direct the activities of the Affirmative Action Program, in collaboration with Junior Aumavae. Erica Barry and Raylene Griffith have Mayor Bronson's and top-level management's full support to implement the MOA's Affirmative Action Program.

Erica Barry and Raylene Griffith are responsible for:

1. Ensuring policies are followed by developing policy statements, overseeing the Affirmative Action Program, and engaging in necessary internal and external communication with managers, supervisors and employees, among others;
2. Identifying and discussing with management any problem areas;
3. Co-developing with management solutions for any identified problem areas;
4. Maintaining an audit and reporting system to monitor the progress of the MOA's Affirmative Action Program;
5. Informing management of latest developments in the areas of affirmative action and equal employment opportunity;
6. Assisting in finding career counseling resources for employees with disabilities;
7. Ensuring the policy statement and required posters are posted on bulletin boards and/or electronic postings; and
8. Ensuring employees placed through these policies are not harassed or otherwise subjected to unlawful discrimination.
9. In addition, Junior Aumavae will assist by serving as the MOA liaison for community groups, governmental agencies, organizations for individuals with disabilities and vocational rehabilitation organizations.

**TRAINING**  
**41 CFR Section 60-741.44(j)**

All personnel involved in recruitment, screening, selection, promotion, discipline, and related processes are trained to ensure proper implementation of the commitments and objectives set forth in this Affirmative Action Program.

**UTILIZATION GOALS FOR INDIVIDUALS WITH DISABILITIES**  
**41 CFR Section 60-741.45**

The OFCCP establishes a utilization goal of 7% for employment of qualified individuals with disabilities for each Job Group in the MOA's workforce, or for the MOA's entire workforce if the workforce consists of 100 or less employees. The utilization goal is not a rigid and inflexible quota that must be met, nor should it be considered a ceiling or a floor for the employment of individuals experiencing disabilities. Instead, the purpose of a utilization goal is to establish a benchmark against which the MOA can measure the representation of protected classes within each Job Group in its workforce, or within its entire workforce. Anchorage evaluates its utilization of individuals with disabilities in each Job Group and in its entire workforce.

**Utilization Summary of Individuals with Disabilities  
(By Job Group using the Any Difference Rule)  
41 CFR Section 60-741.45**

Table 2 displays the Utilization of Individuals with Disabilities Summary by Job Group. In addition, there is a column on this table labeled "Application %". This column displays the percentage of applicants to job postings within the Job Group who self-identified as experiencing a disability. This column is presented in order to gauge the degree to which the MOA is attracting applicants who experience disabilities to the various Job Groups and aid in identifying problem areas. To further aid in identifying problem areas, adverse impact analyses were performed on each Job Group.

Table 2 - Utilization of Individuals with Disabilities Summary by Job Group

Job Group	Workforce	# Disability	Disability Utilization	Disability Utilization Goal	Underutilized?	Expected	Application %
ADMN1: Administrative 1	45	4	8.89%	7.00%	N	-	15.49%
ADMN2: Administrative 2	37	2	5.41%	7.00%	Y	2	13.57%
AE1: Architecture and Engineering 1	78	1	1.28%	7.00%	Y	5	12.50%
AE2: Architecture and Engineering 2	46	2	4.35%	7.00%	Y	3	11.86%
AFD1: Fire 1	5	0	0.00%	7.00%	Y	1	0.00%
AFD2: Fire 2	11	0	0.00%	7.00%	Y	1	0.00%
AFD3: Fire 3	12	0	0.00%	7.00%	Y	1	11.11%
AFD4: Fire 4	68	0	0.00%	7.00%	Y	4	0.00%
AFD5: Fire 5	78	1	1.28%	7.00%	Y	5	1.89%
AFD6: Fire 6	176	3	1.70%	7.00%	Y	12	5.05%
APD1: Law Enforcement 1	15	0	0.00%	7.00%	Y	1	0.00%
APD2: Law Enforcement 2	46	0	0.00%	7.00%	Y	3	0.00%
APD3: Law Enforcement 3 <sup>1</sup>	231	1	0.43%	7.00%	Y	16	-
APD4: Law Enforcement 4	122	0	0.00%	7.00%	Y	8	8.32%
APD5: Law Enforcement 5	5	0	0.00%	7.00%	Y	1	10.00%
APD6: Law Enforcement 6	58	1	1.72%	7.00%	Y	4	4.22%
BF1: Business and Finance 1	154	7	4.55%	7.00%	Y	10	14.73%
BF2: Business and Finance 2	112	6	5.36%	7.00%	Y	7	17.59%
BF3: Business and Finance 3	77	2	2.60%	7.00%	Y	5	12.10%
CONS1: Construction 1	40	0	0.00%	7.00%	Y	2	0.00%
CONS2: Construction 2	53	1	1.89%	7.00%	Y	3	7.32%
CONS3: Construction 3	84	1	1.19%	7.00%	Y	5	4.30%
EC1: Emergency Communication 1	28	3	10.71%	7.00%	N	-	25.00%
EC2: Emergency Communication 2	49	3	6.12%	7.00%	Y	3	12.57%
HEALTH1: Health 1	2	1	50.00%	7.00%	N	-	19.05%
HEALTH2: Health 2	18	0	0.00%	7.00%	Y	1	7.87%
HEALTH3: Health 3	20	2	10.00%	7.00%	N	-	14.81%
ITS1: Information Technology 1	26	0	0.00%	7.00%	Y	1	0.00%
ITS2: Information Technology 2	40	0	0.00%	7.00%	Y	2	13.71%
LEGAL1: Legal 1	20	0	0.00%	7.00%	Y	1	0.00%
LEGAL2: Legal 2	13	0	0.00%	7.00%	Y	1	23.81%
LEGAL3: Legal 3	1	0	0.00%	7.00%	Y	1	13.79%
LIB1: Library 1	29	0	0.00%	7.00%	Y	2	12.77%
LIB2: Library 2	42	2	4.76%	7.00%	Y	2	20.00%
M1: Management 1	64	3	4.69%	7.00%	Y	4	20.25%
M2: Management 2	42	2	4.76%	7.00%	Y	2	12.79%
MAT1: Materials Handling 1	11	0	0.00%	7.00%	Y	1	6.67%
MAT2: Materials Handling 2	21	0	0.00%	7.00%	Y	1	9.09%
MECH1: Mechanical 1	32	0	0.00%	7.00%	Y	2	9.52%
MECH2: Mechanical 2	26	2	7.69%	7.00%	N	-	8.00%
MECH3: Mechanical 3	37	0	0.00%	7.00%	Y	2	12.28%
MECH4: Mechanical 4	64	1	1.56%	7.00%	Y	4	9.23%
MxG1: Maintenance and Grounds 1	5	0	0.00%	7.00%	Y	1	15.38%
MxG2: Maintenance and Grounds 2	25	1	4.00%	7.00%	Y	1	6.52%
PROD1: Production 1	41	0	0.00%	7.00%	Y	2	9.52%
PROD2: Production 2	21	0	0.00%	7.00%	Y	1	8.54%
REC1: Parks and Recreation 1	18	1	5.56%	7.00%	Y	1	11.76%
REC2: Parks and Recreation 2	4	0	0.00%	7.00%	Y	1	0.00%
SCI1: Science 1	22	0	0.00%	7.00%	Y	1	21.82%
SCI2: Science 2	23	0	0.00%	7.00%	Y	1	9.88%
TRNS1: Transportation 1	103	3	2.91%	7.00%	Y	7	6.36%

Notes:

1. Positions in APD3: Law Enforcement 3 are not filled by competitive recruiting. This job group consists entirely of positions in job classification 20000141 Senior Police Officer and employees are reclassified to this classification after attaining 5 years seniority in job classification 20000140 Police Officer in accordance with a collective bargaining agreement.

**IDENTIFICATION OF PROBLEM AREAS**  
**41 CFR Section 60-741.45(e)**

When the percentage of individuals with disabilities in one or more Job Groups is less than the utilization goal of 7.0%, the MOA takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, the MOA assesses personnel processes, minimum qualification requirements, the effectiveness of outreach and recruitment efforts, the results of its Affirmative Action Program audit, and any other areas that might affect its Affirmative Action Program’s success.

There were five (5) Job Groups where there was no under-utilization of individuals experiencing disabilities.

Job Group	Workforce	# Disability	Disability Utilization	Disability Utilization Goal
ADMN1: Administrative 1 EC1: Emergency Communication 1	45	4	8.89%	7.00%
HEALTH1: Health 1	2	1	50.00%	7.00%
HEALTH3: Health 3	20	2	10.00%	7.00%
MECH2: Mechanical 2	26	2	7.69%	7.00%

Where a Job Group’s utilization is less than the 7.0% utilization goal, but the percentage of applicants is greater than the presumed availability of 7.0% and adverse impact analysis of placement activity revealed that individuals experiencing a disability were the most favored group in selection in 2022, the MOA will not consider this Job Group a problem area as there does not appear to be impediments to equal employment opportunity. Nine (9) Job Groups meet these criteria.

Job Group	Workforce	# Disability	Disability Utilization	Disability Utilization Goal	Underutilized?	Application %	Most Favored Group in Selection
ADMN2: Administrative 2	37	2	5.41%	7.0%	Yes	13.57%	Yes
AE2: Architecture and Engineering 2	46	2	4.35%	7.0%	Yes	11.86%	Yes
BF2: Business and Finance 2	112	6	5.36%	7.0%	Yes	17.59%	Yes
CON2: Construction 2	53	1	1.89%	7.0%	Yes	7.32%	Yes
EC2: Emergency Communication 2	49	3	6.12%	7.0%	Yes	12.57%	Yes
LEGAL2: Legal 2	13	0	0.00%	7.0%	Yes	23.81%	Yes
MECH4: Mechanical 4	64	1	1.56%	7.0%	Yes	9.23%	Yes
REC1: Parks and Recreation 1	18	1	5.56%	7.0%	Yes	11.76%	Yes
SCI2: Science 2	23	0	0.00%	7.0%	Yes	9.88%	Yes

The remaining 37 Job Groups are considered problem areas and are divided into two tiers with Tier 1 being areas of greater concern than Tier 2.

Tier 1 problem areas include Job Groups where the utilization is less than the 7.0% utilization goal and the percentage of applicants is less than the presumed availability of 7.0%. This indicates the need for greater focus on outreach. In addition, the job classifications in these Job Groups will be reviewed to determine whether the minimum qualifications may inappropriately present a bar to employment for persons experiencing disabilities. The results of this review will be part of the first quarterly Affirmative Action Program audit report.

Job Group	Workforce	# Disability	Disability Utilization	Disability Utilization Goal	Underutilized?	Application %
AFD1: Fire 1	5	0	0.00%	7.00%	Y	0.00%
AFD2: Fire 2	11	0	0.00%	7.00%	Y	0.00%
AFD4: Fire 4	68	0	0.00%	7.00%	Y	0.00%
AFD5: Fire 5	78	1	1.28%	7.00%	Y	1.89%
AFD6: Fire 6	176	3	1.70%	7.00%	Y	5.05%
APD1: Law Enforcement 1	15	0	0.00%	7.00%	Y	0.00%
APD2: Law Enforcement 2	46	0	0.00%	7.00%	Y	0.00%
APD6: Law Enforcement 6	58	1	1.72%	7.00%	Y	4.22%
CONS1: Construction 1	40	0	0.00%	7.00%	Y	0.00%
CONS3: Construction 3	84	1	1.19%	7.00%	Y	4.30%
ITS1: Information Technology 1	26	0	0.00%	7.00%	Y	0.00%
LEGAL1: Legal 1	20	0	0.00%	7.00%	Y	0.00%
MAT1: Materials Handling 1	11	0	0.00%	7.00%	Y	6.67%
MxG2: Maintenance and Grounds 2	25	1	4.00%	7.00%	Y	6.52%
REC2: Parks and Recreation 2	4	0	0.00%	7.00%	Y	0.00%
TRNS1: Transportation 1	103	3	2.91%	7.00%	Y	6.36%

Tier 2 problem areas include Job Groups where the utilization is less than the 7.0% utilization goal, but the percentage of applicants is greater than the presumed availability of 7.0%. This indicates that current outreach needs to be sustained and in time progress will be made toward the utilization goal. Progress will be reported in the quarterly Affirmative Action Program audit reports.

Job Group	Workforce	# Disability	Disability Utilization	Disability Utilization Goal	Underutilized?	Application %
AE1: Architecture and Engineering 1	78	1	1.28%	7.00%	Y	12.50%
AFD3: Fire 3	12	0	0.00%	7.00%	Y	11.11%
APD3: Law Enforcement 3	231	1	0.43%	7.00%	Y	-
APD4: Law Enforcement 4	122	0	0.00%	7.00%	Y	8.32%
APD5: Law Enforcement 5	5	0	0.00%	7.00%	Y	10.00%
BF1: Business and Finance 1	154	7	4.55%	7.00%	Y	14.73%
BF3: Business and Finance 3	77	2	2.60%	7.00%	Y	12.10%
HEALTH2: Health 2	18	0	0.00%	7.00%	Y	7.87%
ITS2: Information Technology 2	40	0	0.00%	7.00%	Y	13.71%
LEGAL3: Legal 3	1	0	0.00%	7.00%	Y	13.79%
LIB1: Library 1	29	0	0.00%	7.00%	Y	12.77%
LIB2: Library 2	42	2	4.76%	7.00%	Y	20.00%
M1: Management 1	64	3	4.69%	7.00%	Y	20.25%
M2: Management 2	42	2	4.76%	7.00%	Y	12.79%
MAT2: Materials Handling 2	21	0	0.00%	7.00%	Y	9.09%
MECH1: Mechanical 1	32	0	0.00%	7.00%	Y	9.52%
MECH3: Mechanical 3	37	0	0.00%	7.00%	Y	12.28%
MxG1: Maintenance and Grounds 1	5	0	0.00%	7.00%	Y	15.38%
PROD1: Production 1	41	0	0.00%	7.00%	Y	9.52%
PROD2: Production 2	21	0	0.00%	7.00%	Y	8.54%
SCI1: Science 1	22	0	0.00%	7.00%	Y	21.82%