Employment Policies – Equal Employment Opportunity & Affirmative Action

Policy

Community Counseling Center (CCC) is committed to Equal Opportunity in employment for all employees and applicants. CCC does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, and related medical conditions), sexual orientation, marital status, disability, military service or veteran status, protected medical condition as defined by applicable state or local law, genetic information or any other characteristic protected by applicable federal, state or local laws and ordinances.

CCC's management team is dedicated to this policy with respect to all terms, conditions, and privileges of employment, including recruitment, hiring, placement, promotion, transfer, training, discipline, termination, compensation, benefits, employee activities, access to facilities and programs and general treatment during employment.

CCC is at times, a recipient of federal funding and depending on the type of federal funding, may be subject to Section 503 of the Rehabilitation Act of 1973 ("Section 503"), and the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended ("VEVRAA"). As required under federal laws, CCC is committed to taking affirmative action to employ, advance in employment, and otherwise treat qualified individuals with a disability and protected veterans without regard to veteran or disability status. CCC also will provide reasonable accommodations to known physical or mental limitations of qualified individuals with disabilities unless the accommodation would impose an undue hardship on the CCC's business.

CCC's affirmative action policy prohibits employees and applicants from being subjected to retaliation. Without fear of retaliation, harassment, intimidation, threats, coercion or discrimination, employees may engage in: 1) filing a complaint; 2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of any federal, state or local equal employment opportunity or affirmative action law; 3) opposing any act or practice made unlawful by federal, state or local law requiring equal employment opportunity or affirmative action, including Section 503 and VEVRAA; or 4) exercising any other employment right protected by VEVRAA, Section 503, or their implementing regulations.

The non-confidential portions of the affirmative action program shall be available for inspection upon request by any employee or applicant for employment by request to the HR Director and can be viewed between the hours of 8:00am – 4:30pm, Monday-Friday.

CCC will not discriminate or take adverse action against employees or applicants who inquire about, discuss, or disclose their own compensation or that of other employees or applicants. However, CCC employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the compensation information to individuals who do not otherwise have access to such information except if such disclosure is 1) in response to a formal complaint or charge; 2) to

further an investigation, hearing, or action, including an investigation by the contractor; or 3) to furnish the information consistent with a legal duty.

Reasonable accommodations

CCC will endeavor to make a reasonable accommodation for an otherwise qualified applicant or employee related to an individual's known physical or mental disability; sincerely held religious beliefs and practices; and/or any other reason required by applicable law, unless doing so would impose an undue hardship upon the CCC's business operations.

Any qualified applicant or employee who needs an accommodation in order to perform the essential functions of the job should contact the HR Compliance Specialist to request such an accommodation. The individual should specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. CCC will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such an accommodation can be made. CCC will evaluate requested accommodations, and as appropriate, identify other possible accommodations, if any. The individual will be notified of CCC's decision regarding the request within a reasonable period. CCC treats all medical information submitted as part of the accommodation process in a confidential manner.

Procedures

CCC is committed to the principles of Equal Employment Opportunity and Affirmative Action as set forth in this Policy. The HR Director is responsible for formulating and implementing this policy; and for disseminating, monitoring, and ensuring overall compliance with this policy; for maintaining all records in compliance with applicable laws and regulations; and for auditing employment practices to verify compliance with the policy.

While overall authority for implementing this policy is assigned to the HR Director, an effective equal employment opportunity program cannot be achieved without the support of supervisory personnel and employees at all levels. Any employee who believes they have suffered from discrimination should report this concern to their supervisor and the HR Director. All employees of the CCC are responsible for compliance with this policy. Employees also are responsible for reporting in good faith any reasonably suspected violations of this policy as soon as possible to their supervisor or HR Director.

Complaints

1. Complaints should be submitted as soon as possible after an incident has occurred to Human Resources.
2. Reports can be made verbally or preferably in writing and should include as much detail as possible (names, dates, description of behavior, witnesses, etc.).
3. Complaints will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

4. Human Resources will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
5. If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer or administrative leave.
6. During the investigation, Human Resources may interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
7. Upon conclusion of the investigation, Human Resources will submit a written report of their findings to the CEO, or the COO, during the CEO's absence. The investigation report and any statements submitted by the complainant or respondent will be reviewed to determine the appropriate corrective action (if any).
8. Once a final decision is made, Human Resources will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

CCC prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about discrimination.

If employees have questions or feel that they have been discriminated against because of a protected status, have been improperly denied a reasonable accommodation, have experienced retaliation, or have witnessed or been subjected to conduct that is otherwise inconsistent with this policy, then the employee must follow the reporting procedures outlined in the above complaint procedure.

Review Responsibilities

Administration shall review this policy annually and make necessary changes as indicated by law and regulatory agencies.

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