



AFFIRMATIVE ACTION PROGRAMS

**For People of Color, Women and
Individuals with Disabilities**

January 1, 2023 – December 31, 2023

Updated: May 10, 2023

TABLE OF CONTENTS

Description of the Organization	Page 3
Definitions	Page 3
EEO Policy	Page 6
Assignment of Administrative Responsibility	Page 7
Dissemination of Plan	Page 8
Monitoring, Auditing and Reporting	Page 9
Workforce Analysis	Page 9
Monitoring, Auditing and Reporting	Page 10
Goals	Page 10
Identification and Prevention of Problems	Page 10
Action-Oriented Programs	Page 11
Anti-Harassment Policy	Page 15
Non-Discrimination Policy	Page 16

DESCRIPTION OF ORGANIZATION

Alluma, Inc. is a private, not for profit corporation operating as a Certified Community Behavioral Health Center in Minnesota. Alluma originally incorporated in July 1962 as the Northwestern Mental Health Center, Inc. and officially changed its name to Alluma in July 2021.

Main Office: Crookston Clinic, 603 Bruce Street, P.O. Box 603, Crookston, MN 56716-0603

Other Offices: Northwest Apartments, 100 Gretchen Lane, Crookston, MN 56716
East Grand Forks Clinic, 1422 Central Ave NE, East Grand Forks, MN 56721
Ada Clinic, 402 3rd St E #2, Ada, MN 56510

Co-Located Sites: North Valley Health Center, 300 Good Samaritan Drive, Warren, MN 56762
Kittson Memorial Healthcare Center, 1010 Birch Street, Hallock, MN 56728
Essentia Health, 900 Hilligoss Boulevard SE, Fosston, MN 56542

School Locations: Alluma staff are present in many schools throughout our service area via our School Linked Mental Health Program.

Community Based Services: Many Alluma staff provide services to clients in the client's home and/or community settings. These staff may operate based out of their home or an Alluma office.

This plan covers the above work settings as well as any changes of address and/or expansion that Alluma may do during the course of the plan year.

DEFINITIONS USED IN THIS AFFIRMATIVE ACTION PLAN

Individual with a Disability: any person who has a physical, sensory, or mental impairment which "materially" (Minnesota) or "substantially" (federal) limits one or more major life activities, or has a record of or is regarded as having such an impairment. "Individual with a Disability" does not include an alcohol or drug abuser whose current use of alcohol or drugs renders that individual a direct threat to property or the safety of others.

American Indian or Alaska Native - a person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

Asian - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American - A person having origins in any of the black racial groups of Africa.

Hispanic or Latino - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Native Hawaiian or Other Pacific Islander - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Minority – Any person who identifies as being American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, or in any combination of these identifiers, or someone who identifies as White and as any of the other identifiers.

Job Groups: Alluma uses the following broad job groups as one methodology of analyzing its workforce. These are the job groups utilized by the Minnesota Department of Human Rights and are the job groups used when reporting Alluma data to MDHR.

Managers and Administrators: Administrative personnel set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of an organization's operations. This category includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents, and buyers. Unless specifically listed under officials and managers or craft (skilled), first line supervisors, who engage in the same activities as the employees they supervise, should not be reported under this category.

Alluma Positions: Clinical and Administrative Officers, Directors and Managers

Professionals and Technicians: Professionals are considered to be persons working in occupations requiring either college graduation or comparable work experience. Technicians are those whose work requires a combination of basic scientific knowledge and manual skills such as can be attained through two-year technical or community college degrees or equivalent on-the-job training.

Alluma Positions: Nurses (all levels), Mental Health: Professionals, Clinical Trainees, Practitioners, Rehabilitation Workers, Peer Specialists, Homeless Services Specialists, Informatics Specialists, IT Specialists, Psychologist

Office and Clerical: All clerical work regardless of the level of difficulty in which activities are predominantly non-manual (though some manual work not directly involved with altering or transporting the products is included). This includes: bookkeepers, collectors, messengers, and office helpers, office machine operators, shipping and receiving clerks, stenographers, typists, secretaries, and telephone operators.

Alluma Positions: Billing Specialists, Access Specialists, Executive Administrative/Administrative Support, Medical Records

Laborers: (Unskilled): Workers in manual occupations which generally require no special training. They perform elementary duties which may be learned in a few days and which require the application of little or no independent judgment. This includes: garage laborers, car washers, gardeners, and lumber workers, laborers performing lifting, digging, mixing and loading.

Alluma Positions: Maintenance Specialists.

Unused Job Groups: MDHR also recognizes the following job groups. Alluma currently does not have positions which fall into these jobs groups.

Operatives: (Semi-skilled): Workers who operate machines or processing equipment or perform other factory-type duties of an intermediate skill level which can be mastered in a few weeks and requires only limited training. This includes: apprentices, operatives, attendants, delivery and route drivers, truck and tractor drivers, dressmakers, weavers, welders. Include craft apprentices in such fields as auto mechanics, printing, metalwork, carpentry, plumbing and other building trades.

Sales Workers: Occupations engaged wholly or primarily in direct selling. This includes: advertising agents and sales agents, insurance agents and brokers, real estate agents and brokers, sales agents and sales clerks, grocery clerks, cashiers/checkers.

Skilled Crafts: Manual workers of a relatively high skill level who have a thorough and comprehensive knowledge of the process involved in their work. They exercise considerable independent judgment and usually receive an extensive period of training. This includes: building trades, hourly paid foremen and lead-workers who are not members of management, mechanics and repairmen, skilled machinery occupations, electricians. Exclude learners and helpers of craft workers (apprentices).

Service Workers: Workers in both protective and no protective service occupations. This includes: attendants, clean-up workers, janitors, guards, police, fire fighters, waiters and waitresses.

Underutilization: The Minnesota Department of Human Rights defines underutilization in a job group if the number of women or people of color in a job group are less than what is expected based on the availability percentage data adopted for the analysis.

The Department uses the "WHOLE-PERSON RULE" in determining underutilization.

Declaration of underutilization does not indicate discrimination has occurred in a company; rather, it is an opportunity to enable a company to apply good faith efforts to ensure equal employment **opportunities**.

Equal Employment Opportunity (EEO) Policy

Business Name	Alluma, Inc.	Date	Update- May 11, 2023
EEO Compliance Official, Name	Joan Tronson	EEO Compliance Official, Title	Compliance Director
EEO Compliance Official Phone Number	218-281-0270 (Direct Compliance Line)	EEO Compliance Official Email Address	Joan.Tronson@allumacares.org

This is to affirm our policy of providing equal employment opportunities to all employees and applicants for employment in accordance with all applicable laws, directives, and regulations of federal, state, and local governing bodies or agencies.

Our organization will not discriminate against or harass any employee or applicant for employment because of race, color, creed, religion, national origin, sex, sexual orientation, gender identity, disability, age, marital status, familial status, membership or activity in a local human rights commission, status regarding public assistance, genetic information, protected veteran status, race-based natural hair textures and styles, or any other characteristic protected by law. Alluma conforms to the spirit as well as to the letter of the law.

We will take affirmative steps to ensure that all our employment practices are free of discrimination. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selection, layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. We will provide reasonable accommodation to applicants and employees with disabilities whenever possible.

We will evaluate the performance of management and supervisory personnel based on their involvement in achieving these Affirmative Action objectives as well as other established criteria. In addition, all employees are expected to perform their job responsibilities in a manner that supports equal employment opportunities.

I have appointed the above-named EEO Official to manage the Equal Employment Opportunity (EEO) program. This person's responsibilities include monitoring all EEO activities and reporting the effectiveness of the business' Affirmative Action program as required by law. I will receive and review reports on the progress of the program. Any employee or applicant may inspect our Affirmative Action Plan and information related to our EEO program during normal business hours. Please contact the EEO Official for further information.

Any employee or applicant for employment who believes they have been treated in a way that violates this policy should contact either the EEO Official or any other management representative, including me. We will take immediate action to investigate and address allegations of discrimination or harassment confidentially and promptly.



May 11, 2023

Shauna Reitmeier, CEO

Date

Assignment of Administrative Responsibility for Affirmative Action Program

Tracy Solheim, Human Resources Director is designated as the company's EEO manager and is tasked with monitoring all employment activity to ensure that our EEO/AA policies are being carried out. The EEO/AA manager is supported by Breanna Case, Human Resources Manager, and BreezieLynn Lund, Human Resources Generalist to fulfill the duties of the position. These duties include, but are not limited to, the following:

1. Develop an EEO policy statement and Affirmative Action Plan ("AAP") that are consistent with the company's EEO policies and establish our affirmative action goals and objectives.
2. Develop and implement internal and external strategies for disseminating the company's AAP and EEO policies.
3. Conduct and/or coordinate EEO/AA training and orientation.
4. Ensure that our managers and supervisors understand it is their responsibility to take action to prevent the harassment of employees and applicants for employment.
5. Ensure that all minority, female, and disabled employees are provided equal opportunity as it relates to organization-sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions.
6. Implement and maintain EEO audit, reporting, and record-keeping systems in order to measure the effectiveness of our Affirmative Action Plan/Program and to determine whether our goals and objectives have been attained.
7. Coordinate the implementation of necessary affirmative action to meet compliance requirements and goals.
8. Serve as liaison between our organization and relevant governmental enforcement agencies.
9. Coordinate the recruitment and employment of women, people of color, and individuals with disabilities, and coordinate the recruitment and utilization of businesses owned by women, people of color, and individuals with disabilities.
10. Coordinate employee and company support of community action programs that may lead to the full employment of women, people of color, and individuals with disabilities.
11. Keep management informed of the latest developments in the area of EEO.

INTERNAL AND EXTERNAL DISSEMINATION OF AFFIRMATIVE ACTION POLICY AND PLAN

A. Internal Dissemination

1. Alluma's Affirmative Action Plan is available to employees in the document section of UKG, in the Policy folder on the shared drive and on Alluma's website.
2. We will publicize our EEO policy in any newsletters, magazines, annual reports, or other media the company utilizes.
3. Schedule special meetings all other employees to discuss the policy and explain individual employee responsibilities;
4. We will discuss the policy thoroughly during both employee orientation and management training programs;
5. At any such time as Alluma becomes unionized, we will work with the union to develop the Affirmative Action Plan and we will include non-discrimination clauses in all of our union agreements and review all contractual provisions to ensure they are non-discriminatory.
7. We will publish articles in any company publications covering our EEO programs, progress reports, and the accomplishments of employees with disabilities and female employees and employees of color.
8. Our EEO policy statement and non-discrimination posters will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment.
9. When employee or stock photos representing employees, are featured in product or consumer advertising, employee handbooks, or similar publications, we will include images of male and female employees, employees of color, and employees with disabilities.
10. Communicate at least annually to employees the existence of our affirmative action program and make available the elements of its program as well as enable prospective employees to know and avail themselves of all of our program's benefits.
11. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are carefully selected and trained to ensure that the goals and commitments in the company's affirmative action program are implemented.

B. External Dissemination

1. We will notify all recruiting sources of the company's EEO policy, stipulating that these sources actively recruit and refer women and people of color for all positions listed.
2. We will hold formal briefing sessions with representatives from recruiting sources. As an integral part of these briefings, we will include facility tours; clear and concise explanations of current and future job openings; position descriptions; worker specifications; explanations of the company's selection process;

and, recruiting literature. We will make formal arrangements regarding applicant referrals, and follow-up with referral sources regarding the disposition of applicants.

3. Any employees with disabilities who wish to participate in career days, youth motivation programs, and related community activities will be given opportunity to do so.
4. Any recruiting efforts at schools will include specific outreach to students with disabilities.
5. We will make an effort to participate in work study programs with rehabilitation facilities and schools that specialize in the training or educating individuals with disabilities.
6. We will use all available resources to continue or establish on-the-job training and career development programs.
7. We will incorporate the equal opportunity clause into all purchase orders, leases, and contracts.
8. We will send written notification of the company's EEO policy to all sub-contractors, vendors, and suppliers, and request cooperative action from them.
9. We will notify community agencies, community leaders, secondary schools, colleges, and organizations that promote women, people of color, and individuals with disabilities regarding the company's EEO policy.
10. When employees or stock photos representing employees are featured in consumer or help wanted advertising, we will include images of male and female employees, employees of color, and employees with disabilities.
11. We will communicate the existence of our EEO policy to prospective employees and provide sufficient information to enable prospective employees to avail themselves of the policy's benefits.

MONITORING, AUDIT AND REPORTING SYSTEMS

Alluma's EEO Manager has responsibility for implementing and monitoring our affirmative action programs. Department heads, managers, and supervisors are responsible for providing the EEO Manager with information and/or statistical data as necessary to measure our good faith efforts to implement our programs. In addition, they are also responsible for submitting formal reports to the EEO Manager on a scheduled basis regarding the degree to which corporate or unit goals are attained and timetables are met.

At least annually, internal audit reports will be prepared in table format and dated and submitted to the EEO Compliance Director. Data collected for these reports will include applicant flow, new hires, promotions, transfers, and terminations (voluntary and involuntary) by job group. Figures for each personnel process must show a breakdown by sex, minority classification, and disability status. Reports will be disseminated to appropriate levels of management, and any problem areas will be addressed as promptly as possible.

We will preserve all audit data and other applicable documentation and information available as required by law to the Minnesota Department of Human Rights and other government agencies.

Also, once a year we will submit to the *Minnesota Department of Human Rights* and the *Alluma Board of Directors*, on or before, the anniversary date of our Workforce Certificate of Compliance, our Annual Compliance Report as required under Minnesota Administrative Rule 5000.3580 for the company's regular workforce.

WORKFORCE ANALYSIS

Availability/Utilization/Underutilization Analysis

The affirmative action plan includes a workforce analysis prepared by the Human Resources Manager and is based on data that is no more than one year old, including a listing of each job title as it appears in your payroll records ranked from the lowest to the highest paid in each department. If there are separate work units or lines of progression within a department, a separate list must be provided for each work unit, or line, including unit supervisors.

GOALS



The Alluma Strategic Plan includes goals which are directly impacted by this plan (diagram at left). To support achievement of these goals this plan includes the following goals:

- 1- *As we already exceed the availability percentage of women in our job groups our goal is to exceed the availability percentage for persons of color in all job groups.*
- 2- *We will continue in good faith to recruit and retain individuals with disabilities in all levels of our workforce.*
- 3- *We will seek to improve retention of persons of color in our*

workforce.

2023 Highlight: The HR team will be working with local secondary schools to help youth with disabilities and their parents identify career opportunities and create career plans to attain positions at Alluma or in the mental health/substance used disorder fields.

IDENTIFICATION AND PREVENTION OF PROBLEMS

Alluma periodically conducts an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity may exist. We evaluated:

1. We have identified no underutilization of women or people of color in our current workforce. We will continue to monitor our workforce composition to ensure that no problems arise.

2. Personnel activity: We will routinely conduct adverse impact analyses using the "Eighty Percent Test" or other statistical methods to analyze our personnel activities, including applicant flow, hires, promotions, terminations and other personnel actions, to determine if there are selection disparities between men and women, people of color, nonminority (and within specific racial groups, if appropriate), or disabled and nondisabled applicants or employees. For tests are used as a part of our selection process, we confirm these tests are job-related and are validated. We have taken corrective action to remove any barriers to hiring or retaining women, people of color, or individuals with disabilities.
3. Compensation system: We will routinely review our compensation system, including rates of pay and bonuses, to determine whether there is any gender, race, ethnicity, or disability-based disparities. If any disparities are identified, we take prompt action to resolve the disparity. In offering employment to individuals with disabilities, we will not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source.
4. Personnel procedures: We will routinely review all of our personnel procedures and processes, including selection, recruitment, referral, transfers and promotions, seniority provisions, apprenticeship programs and company-sponsored training programs and other company activities to determine if all employees or applicants are fairly considered.
5. Any other areas that might impact the success of our Affirmative Action Program: We continually analyze any other areas that may impact our success, such as accessibility of our facility to the available workforce, the attitude of our current workforce towards EEO, proper posting of our EEO policy and required governmental posters, proper notification of our subcontractors or vendors, and retention of records in accordance with applicable law. We take prompt action to remedy any problems in these areas through training of staff or other methods.

ACTION-ORIENTED PROGRAMS

Alluma recognizes that certain institutional workplace systems and processes have historically contributed to inequalities in the workplace. Alluma is committed to regular review and analysis of its systems with the intent of continuous improvement of those systems in support of the strategic goals of the agency and the specific goals of this plan.

Selection Processes

We will evaluate our selection process using an adverse impact analysis to determine if our requirements screen out a disproportionate number of people of color, women, or individuals with disabilities. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be carefully selected and trained to ensure that there is a commitment to the affirmative action program and its implementation.

Schedule for Review of Job Requirements: We will annually review all physical and mental job requirements to ensure that these requirements do not tend to screen out qualified individuals with disabilities. We will determine whether these requirements are job-related and are consistent with business necessity and the safe performance of the job, and we will remove any physical or mental requirements that do not meet these criteria. Any job descriptions or requirements changed after

review will be distributed to all relevant employees, particularly those involved in the selection process and supervision of employees. Position Descriptions are reviewed by December of each year.

Pre-Employment Medical Examination: Alluma does not require a pre-employment medical examination.

Pre-Employment Testing: Alluma does not generally require pre-employment testing. Should Alluma conduct any pre-employment testing it will only do so under the direction of the Affirmative Action Manager and the process will be audited by the EEO Director for compliance with Alluma's standards as well as any other regulatory requirements.

Accommodations to Physical and Mental Limitations of Applicants & Employees

We will make reasonable accommodations to the physical and mental limitations of an employee or applicant unless such an accommodation would impose an undue hardship on the conduct of the business.

Recruitment of Employees

1. All solicitation or advertisements for employees will state that applicants will receive consideration for employment regardless of their race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, or status with regard to public assistance. When needed, to help address underutilization, help wanted advertising will also be placed in news media oriented towards women or people of color. Copies of advertisements for employees will be kept on file for review by enforcement agencies.
2. When we place help-wanted advertisements, we will not indicate a preference, limitation, or specification based on sex, age, national origin, or other protected characteristic, unless that characteristic is a bona fide occupational qualification for a particular job. We will not allow any employment agency with which we work to express any such limitation on our behalf, and we will require that these agencies share our commitment to Equal Employment Opportunity.
3. All positions for which we post or advertise externally will be listed with State of Minnesota Workforce Centers, America's Job Bank, or similar governmental agencies.
4. We will request the Minnesota Department of Employment and Economic Development to refer qualified individuals with disabilities for employment consideration under our affirmative action programs in accordance with MN Administrative Rule 5000.3557.
5. As necessary to ensure that potential candidates are aware of job openings, we will contact community organizations focused on the employment of women, people of color, and individuals with disabilities (including state vocational rehabilitation agencies or facilities, sheltered workshops, college placement offices, education agencies, or labor organizations).
6. We will keep documentation of all contacts made and responses received, in connection with paragraphs 4 and 5 above, whether formal or informal. We will make every effort to give these agencies a reasonable amount of time to locate and refer applicants. Alluma's position are generally open for one month or more unless the position is critical for operations.

7. We will carry out active recruiting programs at relevant technical schools and colleges, where applicable.
8. We will encourage existing people of color, female and employees with disabilities to recruit additional candidates for employment opportunities.
9. Consideration of people of color and women not currently in the workforce: We will take additional steps to encourage the employment of women, people of color and individuals with disabilities who are not currently in the workforce, such as providing part-time employment, internships, or summer employment programs.

Training Programs

People of color, female and employees with disabilities will be afforded full opportunity and will be encouraged to participate in all organization sponsored educational and training programs.

We will seek the inclusion of qualified people of color, female and disabled employees in any apprenticeship program in which we participate.

Promotion Process

Our promotion process has been developed and documented and only legitimate qualifications are considered in our promotion decisions. We will conduct adverse impact analyses to ensure that women, people of color, and employees with disabilities are promoted at rates substantially similar to men, non-people of color, and individuals without disabilities.

Termination Process

We use progressive discipline before terminating employees, where appropriate. All employees are made aware of our discipline process. We will conduct adverse impact analyses to ensure that women, people of color, and employees with disabilities do not leave our company at rates substantially dissimilar to those of men, non-people of color, and employees without disabilities.

Religion and National Origin Discrimination and Accommodation for Religious Observance and Practice

As a part of our commitment to Equal Employment Opportunity for all, we have made a specific effort to ensure that national origin and religion are not factors in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities are undertaken to ensure religion and national origin are not used as a basis for employment decisions:

1. Recruitment resources are informed of our commitment to provide equal employment opportunity without regard to national origin or religion.
2. Our employees are informed of our policy and their duty to provide equal opportunity without regard to national origin or religion.
3. Employment practices exist and are reviewed to ensure that we implement equal employment opportunity without regard to national origin or religion.

4. The religious observances and practices of our employees are accommodated, except where the requested accommodation would cause undue hardship on the conduct of our business.
5. We do not discriminate against any qualified applicant or employee because of race, color, creed, disability, age, sex, sexual orientation, marital status, or status with regard to public assistance in implementing the policy concerning non-discrimination based on national origin or religion.

Sex, Gender & Sexual Orientation Discrimination Guidelines

We incorporate the following commitments into this AAP to ensure that all laws related to the prohibition of discrimination based on sex are followed:

1. Employment opportunities and conditions of employment are not related to the sex, gender or sexual orientation of any applicant or employee. Salaries are not related to or based upon sex, gender or sexual orientation.
2. Women are encouraged to attend all training or development programs to facilitate their opportunities for promotion, and to apply for all positions for which they are qualified.
3. Alluma recognizes that parenting is not sex/gender specific and therefore we do not deny employment to persons with young children and do not penalize, in conditions of employment, individuals who require time away from work for parental leave.
4. Appropriate physical facilities are provided to all sexes and genders.

Prevention of Harassment and Discrimination

Our company has developed policies prohibiting the harassment of or discrimination against any employee because of any characteristic protected under civil rights laws. These policies are incorporated into new employee orientation and remain available all times to current.

Employees may report compliance violations via Alluma's compliance incident reporting system or directly to the Compliance Director.



POLICY	ANTI HARASSMENT	Policy No.	HR-4
		Board Approval	9.28.20
Contact	Human Resources Director	Department	HR
Purpose	Maintain a working environment that is free from harassment and violence.		

The policy of Alluma is to:

Maintain a working environment that is free from harassment and violence on the basis of race, color, creed, religion, national origin, sex, gender, age, marital status, familial status, status with regard to public assistance, sexual orientation, or disability. Alluma prohibits any form of harassment or violence on the basis of race, color, creed, religion, national origin, sex, gender, age, marital status, familial status, status with regard to public assistance, sexual orientation, or disability.

A violation of this policy occurs when any employee, administrator, or other Alluma personnel harasses an employee, administrator, or other Alluma personnel or group of employees, administrators, or other Alluma personnel through conduct or communication based on a person's race, color, creed, religion, national origin, sex, gender, age, marital status, familial status, status with regard to public assistance, sexual orientation, or disability, as defined by this policy. (For purposes of this policy, Alluma personnel includes board members, employees, agents, volunteers, contractors, or persons subject to the supervision and control of Alluma.)

A violation of this policy occurs when any employee, administrator, or other Alluma personnel inflicts, threatens to inflict, or attempts to inflict violence upon any employee, administrator, or other Alluma personnel or group of employees, administrators, or other Alluma personnel based on a person's race, color, creed, religion, national origin, sex, gender, age, marital status, familial status, status with regard to public assistance, sexual orientation, or disability.

Alluma will act to investigate all complaints, either formal or informal, verbal or written, of harassment or violence based on a person's race, color, creed, religion, national origin, sex, gender, age, marital status, familial status, status with regard to public assistance, sexual orientation, or disability, and to discipline or take appropriate action against any employee, administrator, or other Alluma personnel who is found to have violated this policy.

Alluma will not tolerate verbal or physical conduct by any employee which harasses, disrupts or interferes with another's work performance or which creates an intimidating, offensive or hostile environment.

No retaliation or intimidation directed towards anyone who makes a complaint will be tolerated.

Standards:

This policy shall be conspicuously posted throughout the building in areas accessible to employees.

This policy shall be given to each Alluma employee and independent contractor who regularly interacts with clients of Alluma at the time of initial employment with Alluma. This policy shall appear in the Alluma personnel policies. Alluma will develop a method of discussing this policy with employees.

Alluma may implement violence prevention and character development education programs to prevent and reduce policy violations. Such programs may offer instruction on character education including, but not limited to, character qualities such as attentiveness, truthfulness, respect for authority, diligence, gratefulness, self-discipline, patience, forgiveness, respect for others, peacemaking and resourcefulness.

This policy shall be reviewed at least annually for compliance with state and federal law.



POLICY	Non-Discrimination & EEO	Policy No.	HR-2
		Board Approval	9.28.20
Contact	Human Resources Director	Department	HR
Purpose	Alluma is an equal opportunity employer. In accordance with anti-discrimination law to ensure the principles and mandates are followed.		

The policy of Alluma is to:

Prohibits discrimination of any type and affords equal employment opportunities to employees and applicants without regard to race, color, religion, sex, age, national origin, disability status, protected veteran status or any other characteristic protected by law. Alluma conforms to the spirit as well as to the letter of all applicable laws and regulations.

The policy of equal employment opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between Alluma and its employees, including:

- Recruitment;
- Employment;
- Promotion;
- Transfer;
- Training;
- Working conditions;
- Wages and salary administration;
- Employee benefits; and
- Application of policies.

Alluma collects voluntary AA data and processes/reports in accordance with law.

The policies and principles of EEO also apply to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies, interns, volunteers and any other persons or firms doing business for or with Alluma.

Officers, Directors, Managers and Supervisors are responsible for implementing equal employment practices within each department and functional area.

Affirmative Action/Equal Employment Opportunity Plan is available upon request.

Standards

Alluma administers our Affirmative Action and Equal Employment Opportunity fairly and consistently by:

- Posting all required notices regarding employee rights under EEO laws in areas highly visible to employees.
- Advertising for job openings with the statement: "We are an equal opportunity employer and all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin, disability status, protected veteran status or any other characteristic protected by law."
- Posting all required job opening with appropriate state agencies.
- Forbidding retaliation against any individual who files a charge of discrimination, opposes a practice believed to be unlawful discrimination, reports harassment or assists, testifies or participates in an EEO agency proceeding.
- Requires employees to report to a member of management, an HR representative or employment counsel any apparent discrimination or harassment. The report should be made within 48 hours of the incident.
- The Human Resources Director will submit a Compliance Incident report and will promptly notify the employment counsel of all incidents or reports of discrimination or harassment and take appropriate measures to resolve the situation.