



## **Equal Employment Opportunity/ Affirmative Action Plan**

**2022-2024**

The Grant Wood Area Education Agency shall extend equal opportunities in its employment practices, educational programs and services and shall not discriminate on the basis of color, gender, race, national origin, religion, creed, sexual orientation, gender identity, marital status, disability, socioeconomic background (for programs), age (for employment), veteran status (for employment) or as otherwise prohibited by law. If you believe you or your child has been discriminated against or treated unjustly, please contact the Agency's Equity Coordinator, Maria Cashman, at 319-399-6847 or 1-800-332-8488 or TDD 319-399-6766, Grant Wood AEA, 4401 Sixth St SW, Cedar Rapids, IA 52404.

**John Speer, Chief Administrator**

**Maria Cashman, Equity Coordinator**

*Plan reviewed by Grant Wood AEA Board of Directors ~ September 14, 2022*

**Grant Wood Area Education Agency  
Equal Employment Opportunity/Affirmative Action (EEO/AA) Plan**

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## **Identification of the Equity Coordinator**

Under Grant Wood AEA Board policy, responsibilities of the Equity Coordinator are assigned to the Associate Chief Administrator.

Maria Cashman, Associate Chief Administrator  
Grant Wood Area Education Agency  
4401 6<sup>th</sup> Street SW  
Cedar Rapids IA 52404  
1-319-399-6847  
1-800-332-8488  
TDD: 319-399-6766

## **Responsibilities of the Equity Coordinator**

The Equity Coordinator is responsible for the continued development and coordination of equity efforts. These efforts include to:

1. Implement Agency's EEO/AA plan and ensure review and updating of plan every two years.
2. Review, coordinate and monitor equal employment opportunity and affirmative action efforts.
3. Facilitate the review, coordination and administration of equity compliance evaluation and monitoring systems, which includes quantitative analyses to determine whether under-representation and/or barriers to equal employment opportunity exist.
4. Review, coordinate and administer recordkeeping systems related to various aspects of civil rights compliance.
5. Review, coordinate and administer grievance procedures.
6. Process internal discrimination complaints in an effort to resolve at the local program level.
7. Identify problem areas and monitor steps to alleviate inequitable conditions and situations as they arise.
6. Provide technical assistance to administrators and board members.
7. Provide program development services to educators related to nondiscrimination.
8. Serve as training resource for service delivery staff and others regarding equity legislation.

## **Advisory Committee**

Members of the Grant Wood Area Education Agency Equity Advisory Committee for support of the 2020-22 plan and development of the 2022-24 plan include:

Tisha Emerson, Speech-Language Pathologist  
Dianna Geers, Media Specialist  
Janine Kane, School Psychologist  
Lynn Kleinmeyer, Digital Learning Consultant  
Katy Lee, School Social Worker (retired)  
Patrick Lussenhop, School Psychologist  
Jackie Schreder, Director of Human Resources  
Lynn Tiemann, Speech-Language Pathologist (ELL)  
Martin VanRoekel, Special Education Consultant

## Advisory Committee Membership and Role

The Grant Wood Area Education Agency Board of Directors has established an advisory committee upon the recommendation of the Chief Administrator. Efforts are made for committee membership to include a balance of males and females, a person with disability(ies), and at least one person from each racial/ethnic minority group represented in the regional population. Minority resource persons may also be invited to communicate about the Agency's activities on an annual basis. Opportunities for expanding membership to include greater diversity and representation from client schools and/or the community may be explored on an ongoing basis.

The committee will establish procedures for frequency of meetings and meeting times. Written agendas and minutes will be completed/recorded.

Committee members will be made aware of their advisory capacity and that the administration may not carry out all of the recommendations. At the same time, administration recognizes the responsibility to seriously consider recommendations made by the committee.

In an effort to keep the committee well informed, administration will provide committee members with copies of federal and state legislation, rules, and guidelines related to equal employment opportunity and affirmative action.

Among the specific responsibilities of the committee should be the following:

- Provide periodic review of and support for the EEO/AA Plan.
- Monitor issues of community interest and concern related to equity in employment, programs and services and provide pertinent information to the administration and board.
- Relay information on employment equity activities to the community at large.
- View all Agency employment policies and practices to assess the degree to which they promote multicultural and gender-fair concepts.
- Promote positive intergroup relations within the community, as well as to foster positive intergroup understanding and skills among the employees and the community.
- Assist the Agency in building a more inclusive workforce and promoting culturally responsive practices.
- Make recommendations to the Agency Board and Administration regarding equity issues related to employment, programs and services.
- Alert Equity Coordinator of conditions or situations of concern.

## Advisory Committee Recommendations for 2022-24

The committee has reviewed Agency practices and data indicators and determined proposed goals for 2022-24.



*Administrator's Statement*

September 2022


Grant Wood Area Education Agency reaffirms our commitment to promote fair employment practices, value diversity and provide a supportive work environment. To actively implement these efforts, we will assure that:

- 1) Equal employment opportunity for applicants and employees are provided without regard to color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law. Placement decisions are based solely on an individual's qualifications and skills for the position being filled.
- 2) Other personnel actions such as compensation, benefits, assignments, transfers, layoffs, recalls, and Agency sponsored programs and activities are administered without regard to color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law.

The Equal Employment Opportunity/Affirmative Action plan contained herein helps guide our work in this effort. This plan is intended to support affirmative action practices where appropriately qualified women, men, minorities and/or persons with disabilities are under-represented. Reasonable accommodations will be provided whenever possible in our efforts to advance employment opportunities for persons with disabilities. Equal opportunity shall also be extended to programs and services.

Agency administration values and respects the strength of diverse perspectives and has a strong commitment to equal opportunity and affirmative action. The continued assistance, support and leadership from all Agency staff is needed and expected for attaining the objectives of equal opportunity and advancing the ongoing progress of affirmative action and equity.

Sincerely,



John Speer  
Chief Administrator

## Overview

The Grant Wood Area Education Agency Equal Employment Opportunity/Affirmative Action Plan includes the Board policies, duties of the coordinator and committee, quantitative and qualitative analyses, plus the goals for action. The Board policies establish the legal foundation. The regulations that accompany the policies outline an administrative procedure to implement the Board policies.

## Board Policies

Following are the Grant Wood Area Education Agency's Equal Employment Opportunity/Affirmative Action policies and their accompanying administrative regulations. These policies and administrative regulations are reviewed by the Grant Wood AEA Board of Directors as part of their ongoing review of board policies and include:

**Policy #4119** Equity in Employment, Programs and Services (includes procedure for complaints of discrimination in Agency programs or services)

**Policy #4120** Agency Personnel: Equal Employment Opportunity and Affirmative Action

**Policy #4123** Agency Personnel: Harassment or Bullying

**Policy #4124** Agency Personnel: Discrimination and Harassment Based on Sex Prohibited

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## Equity in Employment, Programs and Services Policy # 4119

Date Adoption: October 15, 1987  
Date Modified: December 15, 1993  
Date Reviewed: May 21, 1997  
Date Modified: April 21, 1999  
Date Modified: May 15, 2002  
Date Modified: May 10, 2006

Date Modified: July 18, 2007 (3000 Series)  
Date Modified: November 13, 2007 (4000 Series)  
Date Reviewed: February 8, 2012  
Date Modified: May 11, 2016  
Date Reviewed: December 8, 2021

The Grant Wood Area Education Agency shall extend equal opportunities in its employment practices, educational programs and services and shall not discriminate on the basis of color, gender, race, national origin, religion, creed, sexual orientation, gender identity, marital status, disability, socioeconomic background (for programs), age (for employment), veteran status (for employment) or as otherwise prohibited by law.

The Agency shall provide for a fair, supportive and non-discriminatory work and learning environment and prohibits discrimination on the basis of protected individual characteristics.

There is a grievance procedure for processing complaints of discrimination. Any complaint of alleged discriminatory conduct shall be properly investigated in a reasonably prompt time frame.

Discrimination or retaliation against any person because the person has filed a discrimination complaint or assisted or participated in such an investigation or proceeding is prohibited. Discrimination or retaliation by an Agency employee is misconduct. An employee who violates this policy may be subject to disciplinary action, up to and including termination.

The Board requires all persons, agencies, vendors, contractors and other persons and organizations doing business with or performing services for the Agency to subscribe to all applicable federal and state laws, executive orders, rules and regulations pertaining to contract compliance and equal opportunity.

*Legal Reference: Iowa Code (2015) Ch 19B, 20, 35C, 73, 216, 256, 280.  
Sec 504, Vocational Rehabilitation Act of 1973, Sec 84.4(a) and 84.8(a).  
Title IX of the Educational Amendments of 1972, Sec 86.9(a).  
Office of Civil Rights Guidelines for Vocational Educ, Sec IV.*

## **Equity in Employment, Programs and Services**

### **Administrative Regulation # 4119A**

Date Adopted: October 15, 1987	Date Reviewed: September 20, 2006
Date Modified: October 31, 1991	Date Modified: November 13, 2007
Date Modified: December 15, 1993	Date Modified: April 16, 2008
Date Reviewed: May 21, 1997	Date Modified: February 8, 2012
Date Modified: May 15, 2002	Date Modified: May 11, 2016
Date Reviewed: May 10, 2006	Date Modified: December 8, 2021

Any complaint of alleged discriminatory conduct or practices, or any dispute involving the interpretation or application of this policy shall be processed by the Agency in accordance with this grievance procedure. If there is a grievance or one has questions regarding these procedures, the following information may be used to contact the Equity Coordinator:

Name: Maria Cashman, Associate Chief Administrator  
Office Address: 4401 6th St SW, Cedar Rapids, IA 52404  
Phone Number: 319-399-6847  
Email: [mcashman@gwaea.org](mailto:mcashman@gwaea.org)  
Office Hours: 8 am to 4:30 pm, Monday through Friday

Employees, students, parents of students, and applicants for employment in the Agency may file a formal complaint alleging discrimination. If appropriate, the Agency will take steps to prevent the recurrence of discrimination and to correct discriminatory effects on the Complainant and others.

A Complainant may attempt to resolve the problem informally by discussing the matter with an Agency supervisor. However, the Complainant has the right to end the informal process at any time and pursue the formal grievance procedures outlined below. Use of the informal or formal grievance procedure is not a prerequisite to the pursuit of other remedies. Please note that an informal process is not to be used in certain circumstances (e.g., sexual harassment and sexual assault).

For complaints related to a child's disability, the complaint is not resolved through this complaint procedure. Rather, the parents have a right to initiate due process procedures under the Iowa Rules of Special Education to resolve the issue. The due process procedures are available from the AEA staff member(s) involved or their immediate supervisor.

#### **Filing a Complaint**

When a Complainant wishes to pursue a formal complaint, he/she may do so by filing a signed, written complaint with the Agency's Equity Coordinator. The complaint will state the nature of the complaint and the remedy requested. Written complaints are to be filed within 25 business days of the event giving rise to the complaint or from the date the Complainant could reasonably become aware of the occurrence. The Equity Coordinator will assist the Complainant as needed.

#### **Investigation**

Within 15 business days, the Equity Coordinator will begin the investigation of the complaint or appoint a qualified person to undertake the investigation (hereinafter "Equity Coordinator"). If the Complainant is under 18 years of age, the Equity Coordinator shall notify his or her parent(s)/guardian(s) that they may attend investigatory meetings in which the Complainant is involved. The complaint and identity of the Complainant, the individual named in the complaint (Respondent), or witnesses will only be disclosed as reasonably necessary in connection with the investigation or as required by law or policy. The investigation may include, but is not limited to the following:

1. A request for the Complainant to provide a written statement regarding the nature of the complaint;
2. A request for the Respondent to provide a written statement;
3. A request for witnesses identified during the course of the investigation to provide a written statement;
4. Interviews of the Complainant, Respondent, or witnesses;
5. An opportunity to present witnesses or other relevant information; and
6. Review and collection of documentation or information deemed relevant to the investigation.

Within 60 business days of beginning the investigation, the Equity Coordinator shall complete the investigation and issue a report with respect to the findings.

The Equity Coordinator shall notify the Complainant and Respondent of the findings within 5 business days of completing the written report. Notification shall be provided and confirmed by electronic means or, alternatively, by U.S. mail.

### **Decision and Appeal**

The complaint is closed after the Equity Coordinator has issued the report, unless within 10 business days after receiving the decision, either party appeals the decision to the Chief Administrator by making a written request detailing why he/she believes the decision should be reconsidered. The Equity Coordinator will promptly forward all materials relative to the complaint and appeal to the Chief Administrator. Within 30 business days, the Chief Administrator shall affirm, reverse, amend the decision, or direct the Equity Coordinator to gather additional information. The Chief Administrator shall notify the Complainant, Respondent, and the Equity Coordinator of the decision within 5 business days of the decision. Notification to the Complainant and Respondent shall be provided and confirmed by electronic means or, alternatively, by U.S. mail.

The decision of the Chief Administrator shall be final.

The decision of the Chief Administrator in no way prejudices or denies the right of the Complainant to file formal complaints with the Iowa Civil Rights Commission, the Federal Office of Civil Rights, the Iowa Department of Education or other agencies available for mediation or rectification of civil rights complaints, or to seek private counsel for complaints alleging discrimination.

This policy and procedures are to be used for complaints of discrimination, in lieu of any other general complaint procedures that may be available.

If any of the stated timeframes cannot be met by the Agency, the Agency will notify the parties and pursue completion as promptly as possible.

Retaliation against any person, because the person has filed a complaint or assisted or participated in an investigation, is prohibited. Persons found to have engaged in retaliation shall be subject to disciplinary action, up to and including termination.

*Legal Reference: Iowa Code §§19B, 20, 35C, 73, 216, 279.8*

*Legal Reference: Sec 504 of the Vocational Rehab Act (1973) Sec 84.4(a) and 84.8(a).*

*Title II of ADA, Title VII of the 1964 Civil Rights Act*

*Title IX of the Educational Amendments of 1972, Sec 86.9(a)*

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## **Agency Personnel: Equal Employment Opportunity and Affirmative Action Policy # 4120**

Date Adopted: May 16, 1984	Date Reviewed: October 18, 2006
Date Modified: April 16, 1990	Date Modified: July 18, 2007
Date Reviewed: March 16, 1994	Date Modified: April 16, 2008
Date Modified: March 19, 1997	Date Modified: June 12, 2013
Date Reviewed: November 15, 1999	Date Modified: May 11, 2016
Date Modified: November 18, 2002	Date Modified: December 8, 2021
Date Modified: May 10, 2006	

The Agency shall actively promote fair employment practices to attract quality individuals and will administer equal opportunity and affirmative action efforts in the recruitment, hiring, assignment and advancement of employees.

An individual shall be provided equal employment opportunities regardless of color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise protected by law. Affirmative action will be taken in job categories where appropriately qualified persons with protected individual characteristics are underrepresented.

To ensure fair, consistent and nondiscriminatory hiring practices, Administration will implement standard selection procedures.



The Associate Chief Administrator will serve as Equity Coordinator. The Equity Coordinator will have the responsibility for coordinating the development and ongoing implementation of the Equal Employment Opportunity and Affirmative Action (EEO/AA) Plan. The EEO/AA Plan will be reviewed and approved by the Board at least every two years.

*Legal Reference: Iowa Code §§19B.11; 35C; 216  
29 U.S.C. Sct 621-34  
42 U.S.C. Sct 2000e et seq.  
281 Iowa Adm Code 11.4; 12.4; 84-88; 95*

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## **Agency Personnel: Equal Employment Opportunity and Affirmative Action Administrative Regulation #4120A**

Date Adopted: April 16, 1990	Date Modified: July 18, 2007
Date Reviewed: March 16, 1994	Date Modified: April 16, 2008
Date Modified: March 19, 1997	Date Reviewed: June 12, 2013
Date Modified: November 15, 1999	Date Modified: May 11, 2016
Date Modified: November 18, 2002	Date Modified: December 8, 2021
Date Reviewed: May 10, 2006	

To advance the Agency’s commitment to equal employment opportunity, affirmative action and diversity, the Agency shall support ongoing training for those who are charged with the administration of Agency policies. Training may also be made available to other interested employees to further develop culturally responsive knowledge and equity-focused practices within the Agency.

The Agency’s complaint procedures (Policies/Regulations #4119) provide a reasonable and timely process to address complaints relating to alleged violations of this policy. Inquiries regarding compliance with this policy or complaints related to this policy may also be directed to the Equity Coordinator or local, state or federal offices (Policy/Regulation #4119).

*Legal Reference: Iowa Code (2015), Ch. 19B.11  
29 U.S.C. Sct 621-34  
42 U.S.C. Sct 2000e et seq.  
281 Iowa Adm Code 11.4; 12.4; 84-88; 95*

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## **Agency Personnel: Harassment or Bullying Policy # 4123**

Date Adopted: April 16, 1984	Date Modified: May 10, 2006
Date Reviewed: April 20, 1994	Date Modified: November 13, 2007
Date Modified: January 15, 1997	Date Modified: February 8, 2012
Date Modified: December 15, 1999	Date Modified: May 11, 2016
Date Modified: January 15, 2003	Date Modified: December 8, 2021

The Agency is committed to providing a safe, supportive and civil work and school/learning environment in which individuals are treated with dignity and respect. Bullying and/or harassing behavior can seriously disrupt the ability of staff to maintain a safe and civil environment and the ability of students to learn and succeed. Harassment or bullying of individuals is prohibited by federal, state and local policy and is not tolerated in the Agency. Accordingly, Agency employees, volunteers and students on Agency property, premises, vehicles or facilities or while engaged in Agency business or present at any Agency function or Agency-sponsored activity shall not engage in harassing or bullying behavior and shall not engage in reprisal, retaliation or false accusation against a victim, witness or an individual who has reliable information about an act of harassment or bullying. (Volunteer means an individual who has regular, significant contact with students.) This policy is also in effect for others doing business with or performing services for the Agency or if the misconduct directly affects the good order, efficient management and welfare of the Agency.

The Agency shall take action deemed appropriate to protect individuals from harassment or bullying.

The Agency shall promptly and reasonably investigate allegations of harassment or bullying. The Equity Coordinator or designee shall be responsible for handling all complaints alleging harassment or bullying. Any employee or volunteer whose behavior is alleged to be in violation of this policy shall be subject to the grievance procedure for processing complaints under Administrative Regulation #4119 (allegations by employees or volunteers) or Administrative Regulation #4123B (allegations by students), as appropriate. Allegations of harassment or bullying by students or others doing business with or performing services for the Agency shall be promptly reported to the appropriate authorities.

Any person who promptly, reasonably and in good faith reports an incident of harassment or bullying under this policy to an Agency official shall be immune from civil or criminal liability relating to such report and to the person's participation in any administrative, judicial or other proceeding related to the report.

Retaliation against any person because the person has filed a harassment or bullying complaint or assisted or participated in such an investigation or proceeding is also prohibited. Individuals who knowingly file false harassment or bullying complaints and any person who gives false statements in an investigation shall be subject to discipline by appropriate measures, as shall any person who is found to have retaliated against another in violation of this policy.

Harassment or bullying by an Agency employee is misconduct. An employee who violates this policy may be subject to disciplinary action, up to and including termination. A volunteer who violates this policy may be subject to measures up to and including removal from services and exclusion from Agency property. A student who violates this policy may be disciplined by appropriate measures up to and including suspension and expulsion.

This policy shall be available on the Agency's website and, at least annually, the policy shall be communicated through the Agency newsletter.

*Legal Reference: Iowa Code §§ 216.9; 280.28; 280.3  
Sec 703, Title VII 29 Code of Federal Regulations  
Chapter XIV, Section 1604.11*

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## **Agency Personnel: Harassment or Bullying** **Administrative Regulation # 4123A**

Date Adopted:	April 16, 1984	Date Modified:	May 10, 2006
Date Reviewed:	April 20, 1994	Date Modified:	November 13, 2007
Date Modified:	January 15, 1997	Date Reviewed:	February 8, 2012
Date Modified:	December 15, 1999	Date Modified:	May 11, 2016
Date Modified:	January 15, 2003	Date Modified:	September 9, 2020
Date Modified:	July 18, 2007	Date Reviewed:	December 8, 2021

Harassment against individuals includes unwelcome behavior related to, but not limited to, color, gender, race, national origin, religion, creed, age, sexual orientation, gender identity, marital status, disability, veteran status or as otherwise prohibited by law.

Harassment against students also includes bullying, hazing or other victimization of students based on any of the following actual or perceived traits or characteristics, including but not limited to age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status or familial status.

Other types of harassment against individuals may include, but not be limited to, sexual harassment, jokes, stories, pictures, objects, verbal or nonverbal communications or actions that are offensive, tend to alarm, annoy, demean, intimidate, abuse, pose a threat of bodily injury or have the purpose or effect of causing injury, discomfort, fear or suffering to the victim(s).

Sexual harassment shall include, but not be limited to, unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or student's education,
- submission to or rejection of such conduct by an individual is used as the basis for employment or academic decisions affecting such individual; or

- such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or student’s academic performance by creating an intimidating, hostile or offensive environment.

Procedures related to discrimination and harassment based on sex as defined by the regulations under Title IX are guided by a separate, stand-alone Board policy (see Policy #4124).

The Agency’s grievance procedures provide a prompt means to consider complaints relating to alleged harassment. (See Administrative Regulation #4119A for allegations by employees or volunteers or Administrative Regulation #4123B for allegations by students). Inquiries or complaints may also be directed to the Equity Coordinator or local, state or federal offices (Policy/Regulation #4119).

*Legal Reference: Sec 703, Title VII; Title IX (34 C.F.R. § 106.30)*

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## **Agency Personnel: Harassment or Bullying against Students** **Administrative Regulation # 4123B**

Date Adopted: November 13, 2007

Date Modified: February 8, 2012

Date Modified: May 11, 2016

Date Reviewed: December 8, 2021

Harassment or bullying against students includes any electronic, written, verbal or physical act or conduct toward a student based on any actual or perceived trait or characteristic of the student and which creates an objectively hostile school environment that meets one or more of the following conditions:

- Places the student in reasonable fear of harm to the student’s person or property;
- Has a substantially detrimental effect on the student’s physical or mental health;
- Has the effect of substantially interfering with the student’s academic performance; or
- Has the effect of substantially interfering with the student’s ability to participate in or benefit from the services, activities or privileges provided by a school.

“Electronic” means any communication involving the transmission of information by wire, radio, optical cable, electromagnetic or other similar means. “Electronic” includes but is not limited to communication via electronic mail, internet-based communications, pager service, cell phones, electronic text messaging or similar technologies.

In situations between students and Agency officials, staff or volunteers who have direct contact with students, bullying or harassment may also include the following behaviors:

- Requiring that a student submit to bullying or harassment by another student, either explicitly or implicitly, as a term or condition of the targeted student’s education or participation in school programs or activities; or
- Requiring submission to or rejection of such conduct as a basis for decisions affecting the student.

Students who feel that they have been harassed should:

- Tell a teacher, counselor or administrator; and
- Write down exactly what happened, keep a copy and give another copy to the teacher, counselor or administrator including:
  - What, when and where it happened;
  - Who was involved;
  - Exactly what was said or what the harasser did;
  - Witnesses to the harassment;
  - What the student said or did, either at the time or later;
  - How the student felt; and
  - How the harasser responded.

### **Filing a Complaint**

Students who believe they have been harassed or bullied by an Agency employee or volunteer may notify Maria Cashman, the Equity Coordinator and designated investigator, to file a written complaint. A designee may be appointed as an alternate investigator. Complaints are to be filed within 25 business days of the event giving rise to the complaint or from the date the Complainant could reasonably become aware of the occurrence. The Complainant will state the nature of the complaint and the remedy requested. The investigator may request the Complainant turn over evidence of the harassment, including but not limited to letters, tapes or pictures. The Complainant shall be given a copy of the completed complaint. Information received during the investigation is to be kept confidential to the extent possible.

The investigator or the individual's supervisor has the authority to initiate an investigation in the absence of a written complaint.

### **Investigation**

Within 15 business days upon receipt of the complaint, the investigator shall begin the investigation. The investigator shall interview the complainant and the alleged harasser. The alleged harasser may file a written statement in response to the complaint. The investigator may also interview witnesses as deemed appropriate. The investigator shall consider the totality of circumstances presented in determining whether conduct objectively constitutes harassment or bullying.

### **Decision**

Within 60 business days of beginning the investigation, the investigator shall make written findings and conclusions as to each allegation of harassment and report the findings and conclusions to the supervisor.

Following receipt of the investigator's report, the supervisor may investigate further, if deemed necessary, and make a determination of any appropriate additional steps that may include discipline.

Prior to the determination of the appropriate remedial action, the supervisor may, at the supervisor's discretion, interview the complainant and the alleged harasser. The supervisor shall file a written report closing the case and documenting any disciplinary action taken or any other action taken in response to the complaint. The complainant, the alleged harasser and the investigator shall receive notice as to the conclusion of the investigation. The investigator shall maintain a log of information necessary to comply with the Iowa Department of Education reporting procedures.

### **Conflicts**

If the investigator is a witness to the incident, the alternate investigator shall investigate.

### **Communication**

These procedures will be communicated to staff at least annually and will be available to the public on the Agency's web site.

*Legal Reference: Iowa Code §§ 216.9; 280.28; 280.3  
Sec 703, Title VII 29 Code of Federal Regulations  
Chapter XIV, Section 1604.11*

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## **Agency Personnel: Discrimination and Harassment Based on Sex Prohibited Policy # 4124**

Date Adopted: September 9, 2020

Date Modified: December 8, 2021

In accordance with Title IX of the Education Amendments Act of 1972, the Grant Wood Area Education Agency prohibits sex discrimination, including sexual harassment as defined by the regulations implementing Title IX (34 C.F.R. § 106.30), against any individual participating in any education program or activity of the Agency. This prohibition on discrimination applies to students, employees, and applicants for employment.

The Board authorizes the Chief Administrator to adopt procedures for any individual to report sexual harassment to the Agency's Title IX Coordinator, for the provision of supportive measures to anyone who has been subjected to sexual harassment whether or not they proceed with a formal complaint under those procedures, and for the investigation and resolution of such complaints, as required by Title IX. This Title IX grievance process shall be used to respond to all complaints of sexual harassment that fall within the scope of Title IX. For complaints of sexual harassment that do not fall within the scope of Title IX, the Agency may still offer supportive measures to the targeted individual of such conduct and shall apply any other policy or procedure applicable to the alleged conduct.

Any individual with questions about the Agency's Title IX policy and procedures, or who would like to make a report or file a formal complaint of sex discrimination or sexual harassment may contact the Agency's designated Title IX Coordinator or alternate Title IX Coordinator:

Mailing Address: 4401 Sixth St SW, Cedar Rapids, IA 52404  
Office Hours: 8 a.m. to 4:30 p.m., Monday through Friday

Title IX Coordinator:  
Maria Cashman, Associate Chief Administrator/Executive Director of Special Education  
Phone: 319-399-6847  
Email: [mcashman@gwaea.org](mailto:mcashman@gwaea.org)

Title IX Alternate Coordinator:  
Darrin Strike, Regional Administrator  
Phone: 319-399-6516  
Email: [dstrike@gwaea.org](mailto:dstrike@gwaea.org)

Retaliation against a person who made a report or complaint of sexual harassment, assisted, or participated in any manner in an investigation or resolution of a sexual harassment report or complaint is strictly prohibited. Retaliation includes threats, coercion, discrimination, intimidation, reprisals, and/or adverse actions related to employment or education. Any individual who believes they have been retaliated against in violation of this Policy should immediately contact the Agency's Title IX Coordinator.

*Legal Reference: 34 C.F.R. § 106.; 20 U.S.C. § 1681*

## Workforce Analysis

An analysis of the Agency's workforce was completed. Each employee is asked to submit data on gender, race/ethnicity, and disability at the time of hire. Disabled employees primarily reflect those who have self identified, and the Agency has not required the filing of an accommodation request through ADA to be classified as disabled. For confidentiality reasons, only a total number of disabled are reported rather than by category.

### Work Force: 2021-22

Job Categories	Total		Gender				Ethnicity				Disability			
			M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	0	0	0	0	0	0	0	0	0	0				
Office Clerical	28	5.5	0	0	28	100	28	100	0	0				
Officials & Mgrs.	28	5.5	8	28.5	20	71.5	28	100	0	0				
Professionals	391	77.2	33	8.4	358	91.6	381	97.4	10	2.6				
Technicians	60	11.8	19	31.7	41	68.3	57	95	3	5				
Total	507	100	60	11.8	447	88.2	494	97.4	13	2.6	3	.6	494*	97.4

\* 10 Declined to disclose (2%)

### Work Force: 2020-21

Job Categories	Total		Gender				Ethnicity				Disability			
			M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	0	0	0	0	0	0	0	0	0	0				
Office Clerical	30	5.7	1	3.3	29	96.7	30	100	0	0				
Officials & Mgrs.	28	5.4	8	28.6	20	71.4	28	100	0	0				
Professionals	383	73.4	33	8.6	350	91.4	373	97.4	10	2.6				
Technicians	81	15.5	19	23.5	62	76.5	76	93.8	5	6.2				
Total	522	100	61	11.7	461	88.3	507	97.1	15	2.9	5	1.0	503*	96.0

\* 14 Declined to disclose (3%)

### Work Force: 2019-2020

Job Categories	Total		Gender				Ethnicity				Disability			
			M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	0	0	0	0	0	0	0	0	0	0				
Office Clerical	32	6.0	1	0.2	31	5.9	32	6.0	0	0				
Officials & Managers	28	5.3	8	1.5	20	3.8	28	5.4	0	0				
Professionals	388	73.7	33	6.3	355	67.4	378	71.7	10	1.9				
Technicians	79	15	18	3.4	61	11.6	73	13.9	6	1.1				
Total	527	100	60	11.4	467	88.6	511	97.0	16	3.0	5	0.9	*504	95.7

\*18 declined to disclose (3.4%)

### Work Force 2018-2019

Job Categories	Total		Gender				Ethnicity				Disability			
			M		F		White		Minority		Y		N	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Craft Workers	0	0	0	0	0	0	0	0	0	0				
Office Clerical	33	6.2	1	0.2	32	6.0	33	6.2	0	0				
Officials & Managers	29	5.5	9	1.7	20	3.8	29	5.5	0	0				
Professionals	391	73.8	32	6.0	359	67.8	382	72.1	9	1.7				
Technicians	77	14.5	16	3.0	61	11.5	72	13.6	5	0.9				
Total	530	100	58	10.9	472	89.1	516	97.4	14	2.6	5	0.9	*504	95.1

\*21 declined to disclose (4.0%)

## Relevant Labor Market

The Grant Wood Area Education Agency (GWAEA) Equity Advisory Committee utilized the Population Estimates Program (PEP) and the American Community Survey (ACS) data, both updated annually and available from the U.S. Census Bureau at <https://www.census.gov/>. This data includes 2021 estimated population characteristics by a specific area or region, and statistics were reviewed at the national and state level as well as for the metropolitan statistical areas of Johnson and Linn counties.

When recruiting for staff vacancies, local, regional and/or national searches are conducted depending on the job category of the vacancy. Questions regarding relevant labor market (below) are utilized when conducting searches. Recruitment activities consider the goals established to affirmatively recruit qualified women, men, members of diverse racial/ethnic groups, and persons with disabilities for job categories where under-representation is indicated.

## Factors for Determining Our Relevant Labor Market for Recruitment

The Grant Wood Area Education Agency recruits employees from a wide variety of locations. All job openings are posted on TeachIowa.gov, a centralized statewide education job posting system. In most circumstances, additional advertising for hourly staff will occur locally; regional and/or national searches may be conducted for contracted, salaried and management staff.

The following questions are asked when determining the labor market in which to advertise for new candidates.

1. Where do current employees live?
2. What are the required qualifications for this position?
3. Where may persons who hold those qualifications reside?
4. Are internal candidates an option for the position?
5. Will the location where we choose to advertise provide us an adequate supply of candidates?
6. What are the race and gender characteristics of people from that location who possess the qualifications?
7. Will the successful candidate be within commuting distance?
8. Would a candidate move from a distant location to take a position?
9. What recruitment mechanisms have been used in the past?

## Promotability Analysis

Employment actions involving transfer, promotion and re-assignment are based on employee qualifications and the needs of the Agency, in accordance with policies established by the Board. External and internal opportunities are communicated and all interested employees may apply for consideration. Vacancies and assignment openings are updated and communicated on a daily basis as openings are available. No problem areas or barriers to equal opportunity have been identified.

## Mobility Analysis

A mobility analysis is completed every two years with the intent to examine staff advancement within the Agency. Staff advancement includes an increased pay level, a change in employee classification, and/or a voluntary change of job category. As a result, advancement may also include lateral changes, which are noted in the analysis. The analysis will help reveal if barriers exist in the advancement of current employees.

For the five prior reporting periods, of the total staff who experienced mobility on a lateral or advanced basis, the following reflects the percentage of that total in under-represented categories related to ethnicity and/or disability:

2010-12	0.0%
2012-14	5.0%

2014-16	2.9%
2016-18	2.1%
2018-20	2.9%

For 2020-22, 1.5% of staff who experienced lateral or advanced mobility were in under-represented categories. This data point is comparable to, although lower than, the demographic composition of Agency staff during this timeframe, and no problem areas or barriers to equal opportunity were identified.

When reviewing mobility data based on gender over the 2020-22 review period, males represented 14.6% of the staff changes. On average, the total percentage of all male employees for this timeframe was 11.8%. When analyzing the mobility related to promotions, males represented 26.1% of these advancements. No problem areas or barriers to equal opportunity were identified.

### Vacancy Analysis

In addition to local demographics, vacancy analysis is another consideration in the adoption of numerical goals. The vacancies for the past two years were examined by employee group. Projected vacancies for the next two years were based on the average number of vacancies per year over the past six-year period.

### Quantitative Analysis: Progress toward Reaching 2020-22 Numerical Goals

The table below depicts the Numerical Goals that had been established for the 2020-22 EEO/AA Plan. As indicated in the shaded area, two of the four numerical goals were achieved.

Job Category	Under-Representation	Projected Vacancies Based on 6-Yr Average	2020-22 Numerical Goal	Results	Actual Vacancies	# of Applicants	Applicant Representation
Office/clerical	Ethnic Minority, Disabled, Gender (male)	10	1 ethnic minority, disabled or male	Not met	4	77	1 non-white (1.3%) 2 male (2.6%) 2 disabled (2.6%) (93.5% responded)
Professional	Ethnic Minority, Disabled, Gender (male)	80	3 ethnic minority, disabled or male	Met (Hired 4 male)	75	446	17 non-white (3.8%) 23 male (5.2%) 1 disabled (0.2%) (92.8% responded)
Officials/managers	Ethnic Minority, Disabled, Gender (Female)	6	2 ethnic minority, disabled or female	Met (Hired 6 female)	12	177	5 non-white (2.8%) 50 male (28.2%) 0 disabled (0%) (93.0% responded)
Technicians	Ethnic Minority, Disabled	30	2 ethnic minority or disabled	Not met	30	244	15 non-white (6.2%) 55 male (22.5%) 1 disabled (0.4%) (94.0% responded)

### Proposed Numerical Goals 2022-2024

Under-representation occurs when individuals in a protected class are employed at a rate below their availability in the work force. U.S. Census data estimates for 2021 indicate total civilian labor force as a percent of population for age 16 years+ is 69.5% and 70.0% for Linn and Johnson counties respectively and the non-white population for each county is 12.6% and 17.7% respectively. (Data previously obtained from data.census.gov in 2021 indicated the total civilian labor force of the United States was 36.4% while for the state of Iowa the total non-white labor force was 12%. The non-white labor force for Linn and Johnson counties was 10.4% and 16.8% respectively. When looking at the education labor force specifically, the non-white labor force in Iowa decreased from 12% to 9.5%.) In 2021-22 the total minority population employed by the Agency was 2.6% (which



compares to recent years as follows: 2.9% in 2020-21; 3.0% in 2019-20 and 2.6% in 2018-19). The Agency minority population has been 2.0% or higher since 2011-12.

Iowa is less racially diverse than the nation as a whole, with census data indicating 90.1% of the population in the state of Iowa reported as white, compared with 75.8% nationwide. This fact is compounded by the likely probability that the availability of minorities qualified to work in the particular occupations of the Agency is lower than the total minority work force. One potential barrier for making progress in minority staffing is the requirement for advanced degrees and specialized licenses that are necessary to be eligible for the majority of positions at the Agency. Qualitative goals include an ongoing effort to inform and encourage qualified employees and potential employees in under-represented categories of job opportunities with the Agency. Note: While males are not considered a protected class, efforts are made to promote gender balance in a field where the majority of positions tend to be held by women.

Based on workforce and vacancy analyses, as well as state and local demographic data, the previous areas identified for under-representation still exist and the Equity Advisory Committee proposes the following numerical goals continue and be retained for the new plan:

Job Category	Projected Vacancies Based on Past 6-Year Average	2022-24 Numerical Goals
Office/clerical	8	<i>1 individual</i> from one or more of the following under-represented groups: ◆ Gender (male) ◆ Ethnic Minority ◆ Disability
Professional	70	<i>3 individuals</i> from one or more of the following under-represented groups: ◆ Gender (male) ◆ Ethnic Minority ◆ Disability
Officials/managers	8	<i>2 individuals</i> from one or more of the following under-represented groups: ◆ Gender (female) ◆ Ethnic Minority ◆ Disability
Technicians	30	<i>2 individuals</i> from one or more of the following under-represented groups: ◆ Ethnic Minority ◆ Disability

### Review Progress toward Qualitative Goals for 2020-22 EEO/AA Plan

1. Continue exploring options for **broadening the recruitment “net”** to engage and communicate with under-represented individuals and groups and further promote an inclusive community.

**Results:**

- All job vacancies are posted on Teach Iowa, a statewide system administered by the Board of Educational Examiners (BoEE) and Department of Education (DE). Teach Iowa provides a single source for all PK-12 public education job openings and is accessible via the DE’s web site. The system and each job posting on the system include a statement that employers on the system will not discriminate in hiring. The Agency’s job openings are dually posted on the Agency web site.
- Dedicated FTE has been retained to support hiring and induction within the Agency. Currently, 1.3 FTE is allocated to internal mentoring and induction support.
- A new management position titled Coordinator of Talent Management was created to support the recruitment, selection, onboarding and retention of high-quality staff and to lead focused activities to attract candidates with wide-ranging backgrounds and experiences. This full-time manager co-leads the hiring process with the respective management link or supervisor for all contracted and classified staff positions.

- To support proactive recruitment endeavors for the future, management links and discipline teams continue their efforts to work directly with key institutions and/or community partners to build/establish relationships and work collaboratively in supporting a variety of field placements for internships, practicums and field experiences. Management links have discretion to determine with their discipline teams the level of support they can provide for student experiences while maintaining quality services.
  - Continuing efforts have been made to recruit and select mentors with diverse backgrounds, varied demographics and broad representation of experiences.
  - Recruitment materials are being reviewed for conferences, job fairs and/or targeted college visits.
2. Promote **visible professional development opportunities** to build cultural awareness and support a cultural proficiency focus for region, discipline and individual growth.

**Results:**

- The Agency’s Professional Learning Office offered 135 workshops and/or courses related to the area of diversity or cultural competence. Of the 135 opportunities available, 24 events were cancelled due to lack of enrollment. For the 111 activities that were held, a total of 2,114 AEA and/or LEA participants attended, with a range of 3 to 150 attendees per course and an average of 19 participants per session.
  - Topics made available through the Professional Learning Office during 2020-22 include:
    - Diversity ~ Equity Matters; Building Bridges Virtual Conference: From Surviving to Thriving; Global Perspectives on Social Justice; Culturally Responsive Teaching and the Brain; Culture and Equity - Implicit Biases; New Teacher Center Special Topics: Coaching to Support Equitable Instruction; Cultural Nature of Child Development; Immigrant Family and Community Engagement in Schools; New Teacher Center Advanced Topics in Coaching: Equity and Learner Variability
    - English Language Learners and culture ~ Creating a Welcoming Environment for Immigrant and English Learners Students and Families; Introduction to Sheltered Instruction for Teachers of ELLs; New Teacher Center Special Topics: Coaching to Support Language Development; ELL Critical Data for the Decision-making Process; Engaging Immigrant and ELL Families in a Virtual World; English Language Proficiency Standards for Educators; Supporting English Learners; Finding Success in the Co-Taught EL Classroom
  - With equity as one of the essential components of Grant Wood AEA’s core values, a new course was developed for AEA staff titled Equity Matters to support learning and implementation of this core value as part of daily practice. A session was offered in Spring of 2021 and Spring of 2022, with 32 staff completing the course. After the first offering, the course was reviewed in consideration of new state legislation related to equity training. The professional learning opportunity was well received and will continue to be available for AEA staff in Fall 2022 and may potentially be offered to LEA staff at some time as well.
  - Learning opportunities available through Iowa Safe Schools, which provides resources to support a safe and supportive community for all students, were promoted in the staff newsletter. Resources through Iowa Safe Schools include a variety of courses related to school climate, diversity and inclusion, safety and wellness. One Iowa Safe Schools project that was highlighted for staff was the School Culture Advocate Certification program. This certification recognizes educators and community advocates who excel at research-driven best practices for building a positive school climate and culture. The coursework provides tools to create welcoming spaces for underrepresented populations, engage students in civic dialogue and ensure that all students feel safe and supported in school. Participants are provided the opportunity take the courses without committing to becoming a certified advocate.
3. **Explore additional resources through community organizations** to learn from the successes of others, enhance and advance opportunities for professional development, increase awareness and understanding regarding emerging issues, promote diversity in education and support a culturally responsive work environment.

**Results:**

- All organizational levels of the Agency are actively engaged in promoting partnerships and connections for the purpose of advancing equitable and effective services. A few of these examples include broad representation on advisory committees and/or community teams, cooperative purchasing to support ELL services and collaborative partner supports for at-risk early learners.
  - Equity Advisory Committee members and interested staff are supported in attending area workshops and other community activities. For 2020-22 these opportunities included the GWAEA Equity Matters course in Spring 2021 and Spring 2022.
  - In Fall 2021 employees were invited to participate in a free online 21-day equity challenge coordinated by the United Way of East Central Iowa (UWECI). Topics included in the challenge, which ran from September 1-30, 2021, included implicit bias, child care, mental health, housing disparities and discrimination and generational wealth.
  - In May 2022 the Agency participated in a Diversity, Equity and Inclusion assessment that was available to area employers through Inclusive ICR, a local coalition with a mission to grow diversity and inclusion in the workforce throughout the region. The assessment, known as the DEI Index, evaluated participating employers through the lens of five DEI pillars: CEO Commitment, Diverse Suppliers, Diverse People, Internal Policy and Community Outreach. The index highlighted where an employer is thriving in the DEI space and identified areas in need of attention and opportunities to grow. More than 95 surveys were completed, which far exceeded ICR's first-year goal. The DEI index results indicated the Agency can celebrate strengths in three of the five pillars, with opportunities to elevate and further develop efforts in the areas of Diverse People and Community Outreach. ICR has launched a new online DEI resource library that provides access to area tools and experts that will continue to be updated.
4. Review existing **feedback and measurement system(s)** to consider potential enhancements for monitoring growth and progress towards cultural proficiency.

**Results:**

- Professional development proposals include a section related to Equity Standards. The standard areas include multi-cultural, gender fair, socio-economic, ELL and other diverse learners. Including the standards on the proposal form acknowledges and supports embedding equity/diversity considerations across learning activities. Offerings are routinely evaluated by participants following each session, and this existing structure further enhances planning for future offerings.
- In Fall 2021, the Equity Advisory Committee shared with staff the priority actions that were developed based on employee feedback provided through the equity needs assessment, which was launched in February 2020 immediately preceding the pandemic. There were 235 staff who participated for a 45% response rate. In addition to feedback through the survey, priority actions also considered recommendations provided by the Organizational Leadership cohorts following their studies in 2019 and 2020 around the Agency's equity efforts. With executive cabinet support, the priority actions that were communicated include:
  - The advisory committee will help develop an agency-wide definition of equity. The survey results demonstrated a lack of alignment and clarity surrounding the term, which can mean many things to many people, and highlighted a need to help staff build an understanding of the concept specifically as it relates to the work at the AEA.
  - The agency will continue offering optional professional learning across all employee groups for staff who may be interested in developing culturally responsive knowledge, promoting common language and building capacity for supporting diversity, equity and inclusion.
  - The agency will continue to build awareness among staff of diverse materials and resources available to support equitable learning experiences, in particular those materials available for use from our Agency's media library.

The agency-wide definition that was developed over the course of 2021-22 was incorporated in the Agency's Equity core value and shared with staff at the all-agency meeting in August 2022. Additional opportunities will be explored for communicating and highlighting the definition for ongoing awareness and alignment. The definition reads:

***Grant Wood Area Education Agency promotes equity through ongoing policies, practices, interactions, and resources that:***

- ***are representative of and responsive to all people;***
  - ***identify and overcome barriers and disparities; and***
  - ***support and empower individuals***  
***to meaningfully participate and experience a sense of belonging, dignity, and success.***
- Feedback from service providers highlighted the need to consider language as an accessibility barrier, and the following actions were identified and/or implemented:
    - The Translate button for web pages was moved to the top of the agency's website.
    - Some content on the website was shifted from a document format to a web page so content can now be translated using the Translate button.
    - Introductory documents and flyers for some services are now available in Spanish and French (Early ACCESS introductory materials are one example) and translation for additional services and other languages will be further explored.
    - Communications staff has begun to include a question when developing Agency materials if there may be a need for content to be available in multiple languages and, if so, will incorporate the use of a QR code application to link content to the Translate function.

## **Proposed 2022-24 Qualitative Goals & Strategies**

Vision for the work that is driven by the agency-wide definition: *Grant Wood AEA will work to provide an environment that is culturally responsive by continually developing workplace skills and practices to ensure equity of service and an inclusive community.* This vision serves as the foundation for continuing the following qualitative goals:

1. Continue exploring options for **broadening the recruitment "net"** to engage and communicate with under-represented individuals and groups and further promote an inclusive community.
2. Promote **visible professional development opportunities** to build cultural awareness and support a cultural proficiency focus for region, discipline and individual growth.
3. **Explore additional resources available through community organizations** to learn from the successes of others, enhance and advance opportunities for professional development, increase awareness and understanding regarding emerging issues, promote equity in education and support a culturally responsive work environment.
4. Review existing **feedback and measurement system(s)** to consider potential enhancements for monitoring growth and progress towards cultural awareness and proficiency.

## **Plan Distribution**

The Grant Wood Area Education Agency shall disseminate the Equal Employment Opportunity/Affirmative Action Plan and policies as follows:

- ◆ An electronic copy of the plan will be provided to each Grant Wood AEA Board Member.
- ◆ A copy of the plan will be available for public use and accessible on the Agency web site.
- ◆ Agency staff are notified of the plan and its locations via internal newsletters.

- ◆ A copy will be made available to the Iowa Director of Education upon request.
- ◆ The Agency's EEO/AA policy statement shall be distributed to all applicants for employment and, on an annual basis, to employees, recruitment sources and the public.

### **Policy Statement Distribution**

The Agency's EEO/AA policy statement is distributed to all applicants for employment and, on an annual basis, to employees, recruitment sources and the public via notice in newspapers of the 7-county area.

### **Physical Facilities Summary**

1. **4401-6th St SW, Cedar Rapids, Iowa:** This is the main facility for the Agency. Parking for persons with disabilities and an elevator provide access to second floor. Also, signage is provided to accommodate the needs of all individuals. Through the renovation of second floor in 2017-18, facility updates were made in consideration of accessibility requirements.
2. **1120-33rd Ave SW, Cedar Rapids, Iowa:** This building is comprised of business condominiums and the Agency owns the first and second floors of the office complex. An elevator provides access to the second floor and signage is provided to accommodate the needs of all individuals. During the renovation of second floor in 2016-17, facility features were updated in compliance with accessibility needs.
3. **2301 Oakdale Blvd, Coralville, Iowa:** This building was constructed in 2015 and occupancy is in partnership with the U of I and Kirkwood Community College. Agency work spaces are located on the 5<sup>th</sup> floor. Parking is available for persons with disabilities, an elevator provides access to all floors and as a new facility all physical features are fully compliant with accessibility requirements.