



GREATER NASHVILLE  
**REGIONAL COUNCIL**

# Affirmative Action Program

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The Greater Nashville Regional Council is an affirmative action employer and is committed to the policies and procedures that promote equal employment opportunity.

**Greater Nashville Regional Council**

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[GNRC.org](http://GNRC.org)



## **Non-Discrimination Policy | Equal Employment Opportunity Employer**

This document was prepared by the Greater Nashville Regional Council (GNRC). GNRC does not discriminate on the basis of race, color, national origin, gender, gender identity, sexual orientation, age, religion, creed or disability in admission to, access to, or operations of its programs, services, or activities. Discrimination against any person in recruitment, examination, appointment, training, promotion, retention, discipline or any other employment practices because of non-merit factors shall be prohibited. Complaints should be directed to Laylah Smith at [lsmith@gnrc.org](mailto:lsmith@gnrc.org), 220 Athens Way Ste. 200, Nashville TN 37228 or phone number 615-862-8863. GNRC is an EEO employer.

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# Affirmative Action Policy Statement

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## Purpose

The Greater Nashville Regional Council (GNRC) is an affirmative action employer and is committed to the policies and procedures that promote equal employment opportunity. Affirmative Action and Equal Employment Opportunity have been established as immediate and necessary agency objectives..

## Definitions

“Affirmative Action” is a program of positive action, undertaken with conviction and effort, to overcome the present effects of past practices, policies or barriers to equal employment opportunity and to achieve the full and fair participation of women, minority groups and any other protected group found to be underutilized in the workforce or affected by policies and practices having an adverse impact.

## GNRC’s Affirmative Action Program

The GNRC has created an Affirmative Action Program to overcome the present effects of any barriers to equal opportunity. In our Affirmative Action Plan, we identify the achievements that have been made through the application of our good faith efforts and, through the full and fair participation of all our employees and in all GNRC undertakings. We also recognize the hiring difficulties experienced by the physically disabled and aging persons, and will set program goals to achieve the full and fair utilization of these persons in the workforce. The GNRC fully supports all federal and state constitutional provisions, laws, regulations, guidelines, and executive orders that prohibit or outlaw discrimination. In accordance with these requirements, no person or facility of GNRC shall be used in the furtherance of any discriminatory practice, nor shall we become a party to any agreement, arrangement, contract or plan that has the effect of sanctioning discriminatory practices. All programs and all employment practices conducted by, sponsored by, or with the approval of, the GNRC shall be open to all qualified persons. Our policy is posted on the GNRC’s policy bulletin boards throughout both office locations, on the GNRC Intranet, and on the GNRC’s internet website. Each employee has the right to review and comment upon the agency’s Affirmative Action Plan. All responses should be addressed to Laylah Smith, the Nondiscrimination Coordinator, who has been assigned all affirmative action duties. She can be reached at 220 Athens Way, Suite 200 Nashville, TN 37228 or at lsmith@gnrc.org. Her phone number at the GNRC is (615) 880-3519.

## Commitment

The GNRC will use viable affirmative action measures in all stages of the employment process pursuant to Tennessee law and in the GNRC Affirmative Action Plan, and will provide services and programs in a fair and impartial manner.

We recognize that programs without effort are meaningless and that effort undirected by specific procedures prevents achievement. We personally pledge our support and commitment to Affirmative Action. We ask each employee to review this policy and be familiar with it. More importantly, however, each employee is expected to commit him/herself to its ideas and objectives as the GNRC has done.

# GNRC Affirmative Action Plan

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Updated FY 2020

## Introduction

The Greater Nashville Regional Council (GNRC) is an association of local governments representing communities across 13 counties in Middle Tennessee. Its purpose is to assist those communities and state agencies in the development of plans and programs that ensure the long-term prosperity of the region

In fulfilling this mission, the GNRC promotes affirmative action and equal opportunity employment to all qualified individuals without regard to race, color, national origin, including Limited English proficiency, gender, gender identity, sexual orientation, age, religion, creed, disability, veteran status, or any other protected class. This practice not only serves to strengthen our organization, but also to inform the GNRC of individual groups not adequately represented amongst current staff. As such, all GNRC employment decisions are made in accordance with Affirmative Action and EEO guidelines in order to effectively reach set goals.

GNRC personnel policies and practices including promotions, benefits, transfers, will also be administered without regard to race, color, national origin, including Limited English proficiency, gender, gender identity, sexual orientation, age, religion, creed, disability, veteran status or any other protected class.

## Appointment and Responsibilities of the Nondiscrimination Coordinator

Responsibility for implementation of all affirmative action programs is placed with the Nondiscrimination Coordinator, Laylah Smith, Chief Legal Counsel, who has been appointed Nondiscrimination Coordinator for the GNRC. Her name will appear on all internal and external communications regarding the GNRC's Affirmative Action programs.

The Nondiscrimination Coordinator will be given necessary senior leadership support to execute this plan. The Nondiscrimination Coordinator has been given specific responsibility to:

Develop policy statements, affirmative action programs, internal and external communication techniques and monitoring systems; Assist management in arriving at solutions to problems; Design and implement audit and reporting systems which will measure the effectiveness of the Affirmative Action Program, indicate need for remedial action, if any, and determine whether the goals and objectives have been obtained; Keep management informed of latest developments in the entire equal employment opportunity area; Assist in identifying problem areas and establishment of the GNRC's goals and objectives.

The GNRC, through the Nondiscrimination Coordinator, reviews records of transfers, promotions, and terminations at all levels to monitor the impact of the GNRC's affirmative action and non-discriminatory policies. In addition, the Nondiscrimination Coordinator meets with each manager and staff member once a year to ascertain how the affirmative action plan is working, and whether the plan has been successful during that year in encouraging employment pursuant to EEO practices and guidelines.

## Responsibilities of Directors, Managers, and Supervisors

All GNRC managers and staff are responsible for assisting in the implementation of the AAP. Responsibilities include, but are not limited to the following:

Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary; Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner in hiring, promotion, transfer, and termination actions; and Reviewing job performance of each employee to assess whether personnel actions are justified based on the employee’s performance of his or her duties and responsibilities.

## Identification of Problem Areas

Areas of Concern	Proposed Action
Underutilization of minorities in Job Groups 1, 1.2, 3 and 5	<p>No later than October 1, 2019, notify management and professional recruitment sources in writing of GNRC’s interest in attracting qualified minorities to apply for the job.</p> <p>No later than October 1, 2019, expand GNRC’s recruitment program to colleges and universities with a significant percentage of minority students.</p>
Underutilization of women and minorities in Job Group 3	<p>No later than October 1, 2019, notify management and professional recruitment sources in writing of GNRC’s interest in attracting qualified women and minorities to apply for the job.</p> <p>No later than October 1, 2019, expand GNRC’s recruitment program to colleges and universities with a significant percentage of women and minority students.</p>

The overall analysis of the GNRC work force indicates that employment of females is significantly above the employment characteristics within the recruiting area. Female employment in the executive, first/midlevel management, professional, administrative support job categories are all substantially higher than the recruitment area average. However, female employment in the technician job category is significantly lower than the recruitment area average.

The majority of GNRC employees are classified as professionals. Within this category, GNRC’s exceeds employment of both females and minorities within the recruiting area.

Minority employment is significantly below the area average within the job categories of executive, technician, and administrative support workers, and below the area average for first/mid-level management positions.

## Action-Oriented Programs

GNRC will develop action programs eliminate problem areas and to achieve affirmative action goals. GNRC will:

1. Annually review job descriptions to ensure they accurately reflect job functions;
2. Make job descriptions available to recruiting sources and all members of management involved in recruiting, screening, selection, and promotion processes;
3. Advertise job openings to ensure women and minority groups are being reached. Job openings are regularly posted with the following recruitment sources where appropriate.
  - Indeed
  - Glassdoor
  - Center for Nonprofit Management
  - American Planning Association
  - Association of Metro Planning Organizations
  - Other Appropriate Minority Sources
4. Evaluate selection process to ensure process is free from process by:
  - Reviewing applications and other preemployment forms to ensure information requested is job related;
  - Ensuring selection processes do not create a disparate impact and are consistent with a business necessity;
  - Training management and staff on proper interview techniques; and
  - Ensuring all staff are trained in EEO and Nondiscrimination.
5. Improve recruitment and increase the flow of minority and female applicants by taking the following actions:
  - Include the phrase “Equal Opportunity/Affirmative Action” in all printed employment advertisements;
  - Place employment advertisements in local minority and women’s interest news media when appropriate;
  - Disseminate information on job opportunities to organizations representing minorities, women, and employment development agencies when job opportunities occur;
  - Encourage GNRC employees to refer qualified applicants;
  - Request employment agencies to refer qualified minorities and women;
  - Actively recruit from predominantly minority or female enrolled universities, colleges, and junior colleges.
6. Perform self-audits of compensation practices;
7. Ensure all employees are given equal opportunity for promotion by:
  - Posting promotion opportunities;
  - Offering counseling to assist employees in identifying promotional opportunities;
  - Offering training and educational programs to enhance promotional opportunities; and
  - Evaluating job requirements for promotion.

## Internal Audit and Reporting Systems

The Nondiscrimination Coordinator has the responsibility for developing, preparing, and implementing the formal documents of the AAP. However, these responsibilities are vested with senior management, directors, managers, and supervisors. The purpose of GNRC's audit and reporting system is to:

- Measure the effectiveness of the AAP/EEO program;
- Document personnel activities;
- Identify problem areas;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which GNRC's AAP goals and objectives have been obtained.

GNRC has engaged in the following activities to ensure nondiscrimination and equal opportunity for all individuals without regard to race, color, national origin, including Limited English proficiency, gender, gender identity, sexual orientation, age, religion, creed, disability, veteran status, or any other protected class.

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, layoff and termination;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, and job descriptions;
- Sick leave, leaves of absence, and any other leave;
- Training, internships, apprenticeships, and attendance at professional meetings and conferences; and
- Any other term, condition, or privilege of employment.

The following documents are maintained as a component GNRC's internal audit process

- An application flow log showing the race, sex, date of application, job title, interview status, and action taken for all individuals applying for job opportunities;
- Summary data of external job offers and hires, promotions, resignations, layoffs, and terminations, by job group, and by sex and race identification;
- Maintenance of employment applications not to exceed one year; and
- GNRC Compensation records.

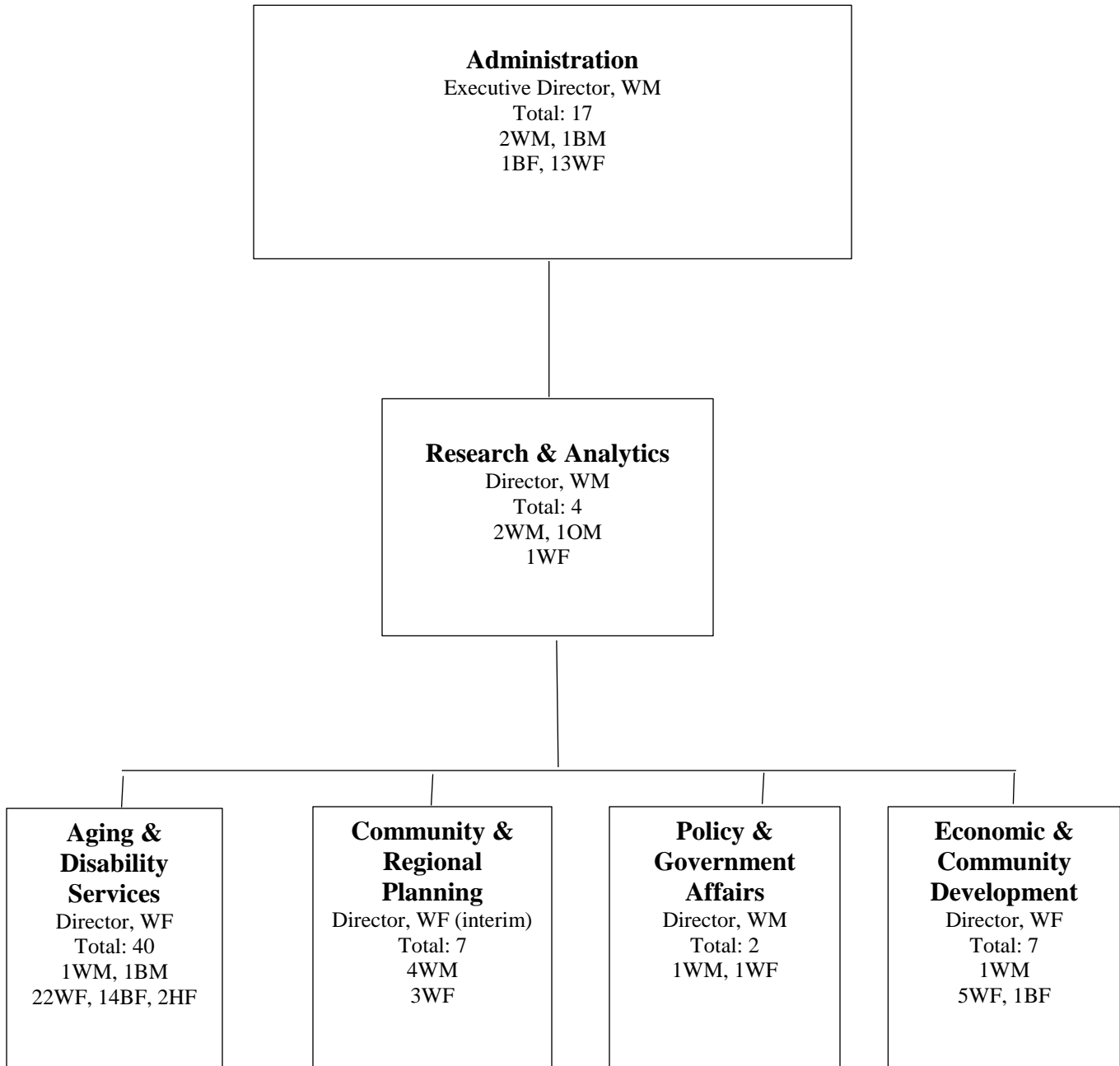
On a biannual basis, all directors, managers, and supervisors are required to report any current or foreseeable EEO problem areas to the Nondiscrimination Coordinator, and are asked to outline suggestions/recommendations for solutions. If any EEO problem areas arise, the director, manager, or supervisor must report problems areas immediately to the Nondiscrimination Coordinator and/or Human Resources.



# GNRC Organization Display

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The organizational display shows each department, the race/sex of the directors and employees within each department, and how all the departments relate to each other.



# Workforce Analysis

The workforce analysis consists of a listing of staff members, by department, by race, sex, disability, and veteran status.

Department	Total	Males	Females	Male Minorities							Female Minorities					Total Minorities		
				Black	Asian	AmIn	Hispanic	Other	Person w/ Disabilitv	Veterans Status	Black	Asian	AmIn	Hispanic	Other		Person w/ Disabilitv	Veterans Status
Administration	17	3	14 82.3%	1	0	0	0	0	0	0	1	0	0	0	0	1	0	2 11.8%
Community & Regional Planning	7	4	3 43%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 0%
Aging & Disability Services	40	3	37 92.5%	1	0	0	0	0	1	2	14	0	0	2	3	0	17 37.5%	
Economic & Community Development	7	1	6 85.7%	0	0	0	0	0	0	0	1	0	0	0	0	0	1 14.3%	
Policy & Government Affairs	2	1	1 50%	0	0	0	0	0	0	0	0	0	0	0	0	0	0 0%	
Research & Analytics	4	3	1 25%	0	0	0	0	1	0	0	0	0	0	0	0	0	1 25%	
<b>Total Employees</b>	<b>77</b>	<b>15</b>	<b>62</b> <b>81%</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>4</b>	<b>21</b> <b>27.2%</b>	

# Job Group Analysis

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The job group analysis provides a list of job titles, the job group name, and EEO category. Each GNRC job title is categorized by one of the following defined job groups.

## **1 Executive/Senior Level Officials and Managers**

This category is reserved for the highest level within the organization. This level includes individuals who plan, direct, and formulate policies, they set the strategy, and they provide information to be approved by the board of directors. Some examples are the chief executive officer or the chief operating officer.

## **1.2 First/Mid-Level Officials and Managers**

Individuals in this category take direction from those in the 1.1 EEO job category. The 1.2 EEO job category includes managers at the group, regional, or divisional level of the organization. Examples might include vice presidents, operations managers, or group directors.

## **2 Professionals**

Jobs in this category typically (but not always) require professional degrees or certifications. This category includes roles like engineers, accountants, teachers, pilots, programmers, lawyers, programmers, and doctors.

## **3 Technicians**

This category includes jobs that require specific skills to be applied in the work. This category is very specific; certainly not every company will have technicians. Some examples include chemical technicians, drafters, engineering technicians, dental hygienists, and emergency medical technicians.

## **4 Sales Workers**

As the name implies, this EEO job category includes anyone dealing in sales as their primary function. Retail salespeople, insurance salespeople, travel agents, real-estate agents, financial services salespeople, and telemarketers are some examples of roles that would fall into this category.

## **5 Administrative Support Workers**

These jobs are typically found in office settings and include roles such as secretaries, paralegals, switchboard operators, payroll and timekeeping clerks, file clerks, dispatchers, and other general office clerks.

## **6 Craft Workers**

Individuals in this category typically will have a specific skill set that makes them qualified for a particular subset of jobs. For example: carpenters, brick and stone masons, plumbers, painters, auto mechanics, and roofers, just to name a few. The distinction here is that a craft worker will have a specific skill to set them apart. This can be difficult to distinguish from the next category, which generally includes what can be termed “semi-skilled” workers.

## **7 Operatives**

This group includes jobs that require minimal (a few months, maximum) training. They can be termed as semi-skilled or intermediate-skilled because the training is less specific, but there is still a specific job title involved. Examples include butchers, forklift drivers, bus drivers, bakers, poultry processing workers, etc.

## **8 Laborers and Helpers**

Roles in this category generally don't require anything more than brief training, and the individuals who perform them are not expected to exercise independent judgment. Some examples might include helpers, assistants, attendants, and freight movers.

## 9 Service Workers

It is important to note that just because this is the last job category does not indicate that it is considered to be the lowest, and certainly not lowest paid. This category includes those in the service sector, such as cooks, bartenders, firefighters, hairdressers, janitors, police, detectives, criminal investigators, and medical assistants.

Job Titles	Job Group Name	EEO-1 Category
Executive Director Deputy Executive Director/Chief Communications Officer Chief Legal Counsel Finance Director	1	Executive/Senior Level Officials and Managers
Director of Research & Analytics Director of Aging & Disability Services Director of Economic and Community Development Policy Director Manager of Data & Information Systems Director of Community and Regional Planning Chief Economic & Development Community Development Officer HR Manager Finance Manager Manager of Office and Administrative Services Manager of Home and Community Based Programs Manager Public Conservator Program Manager Choices Intake Program Manager Manager of Information and Assistance Program Manager of Quality Assurance Solid Waste Planning Manager Environmental Planning Manager	1.2	First/Mid-level Officials and Managers
Information and Assistance Counselor Service Coordinator Senior Planner Financial Coordinator Senior Policy Advisor Leader Service Coordinator	2	Professional

Quality Assurance Analyst Medicare Counselor Community Living Support Ombudsman Director of Small Business Support Assistant Public Conservator Medicare Counseling Coordinator Information and Assistance Counselor CHOICES Intake Program Counselor Compliance Officer Finance Manager Creative Services Coordinator Quality Assurance Analyst Volunteer Coordinator Finance Officer ECD Program Administrator Capital Improvements Planning Manager Senior Research Analyst Housing Coordinator Research Analyst Senior Credit Analyst Lead Counselor Credit Analyst Chief Economic & Community Development Officer		
Intern	1	Technicians
No Job titles in this category	4	Sales Workers
Senior Administrative Assistant Special Projects Coordinator Aging Service Support Workers Administrative Assistant Fiscal Specialist Data Processor	5	Administrative Support Workers
No job titles in this category	6	Craft Workers
No job titles in this category	7	Operatives
No job titles in this category	8	Laborers and Helpers
No job titles in this category	9	Service Workers

# Utilization Analysis

The utilization analysis is a statistical analysis of affirmative action/equal opportunity data that is used to tool for determining the demographics of the available workforce in a specific area. The analysis is also used for identifying and comparing the available workforce in the various job categories. Finally, the utilization analysis helps identify whether GNRC is meeting its goals and helps determines area in which GNRC needs to improve.

For purposes of this Affirmative Action plan, GNRC uses the Metropolitan Statistical Area (MSA) which is comprised of Nashville-Davidson county and the 13 surrounding counties in Middle Tennessee. However, GNRC regularly considers applicants outside the MSA.

## Placement of Staff in Job Groups

Job Group	Total Number of Staff	# of Females	Female Staff %	# of Minorities	Minority Staff %
1	4	3	75%	0	0%
1.2	18	13	72.2%	3	16.6%
2	45	33	73.3%	15	33%
3	1	0	0%	0	0%
4	0	0	0%	0	0%
5	11	11	100%	2	18%
6	0	0	0%	0	0%
7	0	0	0%	0	0%
8	0	0	0%	0	0%
9	0	0	0%	0	0%

## Determining Availability

### OFFICIALS AND MANAGERS

Job Group 1 and 1.2 – Officials and Managers	Raw Statistics	Raw Statistics
	Minority	Female
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	22.1%	40.6%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor’s organization.	16.6%	72.2%

## PROFESSIONALS

<b>Job Group 2 – Professionals</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	25.1%	55.8%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	33%	73.3%

## TECHNICIANS

<b>Job Group 3 – Technicians</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	29.3%	56.1%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	0	0

## SALES WORKERS – Note: GNRC has no staff members in this category.

<b>Job Group 4 -Sales Workers</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	29.5%	50.4%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	0	0

## ADMINISTRATIVE SUPPORT WORKERS

<b>Job Group 5 -Admin Support Workers</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	32.3%	74.6%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	18%	100%

**CRAFT WORKERS** – Note: GNRC has no staff members in this category.

<b>Job Group 6 -Craft Workers</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	30.7%	4.7%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	0	0

**OPERATIVES** – Note: GNRC has no staff members in this category.

<b>Job Group 7 - Operatives</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	41%	25.7%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	0	0

**Laborers and Helpers** – Note: GNRC has no staff members in this category.

<b>Job Group 8 - Laborers and Helpers</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	47%	13.3%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	0	0

**SERVICE WORKERS** – Note: GNRC has no staff members in this category.

<b>Job Group 9 -Service Workers</b>	<b>Raw Statistics</b>	<b>Raw Statistics</b>
	<b>Minority</b>	<b>Female</b>
Percentage of minorities or women with requisite skills in the reasonable recruitment area. US Census EEO Tabulation 2006-2010 (5-year ACS data)	43.8%	59.7%
Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	0	0



## Comparing Current Workforce Data to Availability and Establishing Placement Goals

Job Group	Female Staff %	Female Availability	Goal	Establish Goal? Y/N	Minority Staff %	Minority Availability	Goal	Establish Goal
1	75%	40.6%	40.6%	Yes	0%	22.1%	22.1%	No
1.2	72.2%	40.6%	40.6%	Yes	16.6%	22.1%	22.1%	No
2	73.3%	55.8%	55.8%	Yes	33%	25.1%	25.1%	Yes
3	0%	56.1%	56.1%	No	0%	29.3%	29.3%	No
4	N/A	50.4%			N/A	29.5%		
5	100%	74.6%	74.6%	Yes	18%	32.3%	32.3%	No
6	N/A	4.7%			N/A	30.7%		
7	N/A	25.7%			N/A	41%		
8	N/A	13.3%			N/A	47%		
9	N/A	59.7%			N/A	43.8%		

