



NOTICE OF REGULAR MEETING

URBANA HUMAN RELATIONS COMMISSION

DATE: Wednesday, December 11, 2013

TIME: 5:30 P.M.

PLACE: Urbana City Council Chambers
Urbana City Building
400 South Vine Street
Urbana, Illinois 61801

AGENDA

1. **CALL TO ORDER, ROLL CALL, AND DECLARATION OF QUORUM**
2. **APPROVAL OF AGENDA**
3. **APPROVAL OF MINUTES**
4. **PUBLIC PARTICIPATION**
5. **OLD BUSINESS**
 - A. Taxicab Licensure Presentation and Discussion
 - B. Prior Enforcement Rule Presentation and Discussion
6. **NEW BUSINESS**
7. **STAFF REPORT**
 - A. Approval of EEO Workforce Statistics
 - B. HRO Activity Report
 - C. Budget Report
8. **ANNOUNCEMENTS**
9. **ADJOURNMENT**



URBANA HUMAN RELATIONS COMMISSION OFFICE

NOTICE OF PROPOSED RULE DRAFT ENFORCEMENT GUIDANCE

ENFORCEMENT RULE: "PRIOR CONVICTION" AS A PROTECTED CLASS

SUMMARY:

The Human Relations Office ~~is proposing this rule~~ provides the following guidance to strengthen compliance and enforcement efforts for "prior conviction" as a protected class. The ~~proposed rule~~ guidance seeks to balance increasing effectiveness in enforcement with minimizing disruption to covered businesses.

DATES:

Comments should be received on or before July 26, 2013.

ADDRESSES:

Comments may be submitted by any of the following methods:

- Electronic comments may be submitted to: terent@urbanaininois.us
- Send paper comments to: Todd E. Rent, City of Urbana, Human Relations Office, 400 South Vine Street, Urbana, IL 61801

All submissions should refer to "Enforcement Rule: Prior Conviction". All comments will be made public and posted without alteration. **You should submit only information that you wish to make publicly available.**

FOR ADDITIONAL INFORMATION CONTACT:

Todd E. Rent, Human Relations Officer, (217) 384-2466, City of Urbana, 400 South Vine Street, Urbana, IL 61801.

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URBANA HUMAN RELATIONS DIVISION

POLICY MEMORANDUM

384-2456

TO: Urbana Human Relations Commission

FROM: Todd Rent, Human Relations Officer

RE: Enforcement of Prior Conviction Record as a Protected Class under the Urbana Human Rights Ordinance

BRIEF DESCRIPTION OF THE ISSUE

On December 13, 2011, Peter Resnick, Vice Chair of the Human Relations Commission, raised several questions regarding the enforcement of “conviction record” as a protected class under the Urbana Human Rights Ordinance. Specifically, Commissioner Resnick asked whether an employer violates the Ordinance when it asks whether a job applicant has a conviction record. Commissioner Resnick reasoned that employers who inquire about race, gender, national origin, etc. during an application would clearly be in violation of the Ordinance. Why then, would “conviction record” as a covered “protected class” not be treated similarly?

On December 14, 2011 the Urbana Human Relations Commission heard public input from several members of Citizens with Conviction. The speakers provided compelling accounts of the difficulties associated with securing employment as an ex-offender.

This memo is, in part, intended to address Commissioner Resnick’s questions, albeit from an administrative enforcement vantage point rather than a legal one.

This memorandum will:

1. Describe the current enforcement of “conviction record” as a protected class under the Urbana Human Rights Ordinance;
2. Explain the policy reasoning/rationale underlying current enforcement of “conviction record”;
3. Discuss policy implications of changing the way in which the Human Relations Office enforces “conviction record”; and
4. Present alternative approaches to modify enforcement.

THE RELEVANT ORDINANCE LANGUAGE

Section 12-37 of the Urbana Human Rights Ordinance (“Ordinance”) provides, in part: “It is the intent of the City of Urbana in adopting this article, to secure an end in the city to discrimination, including, but not limited to discrimination by reason of...conviction record...” As such, “conviction record” is listed along with eighteen other specific protected classes.

Section 12-62(c) of the Ordinance provides, in part: “It shall be an unlawful practice for an employer or employment agency to make or use a written or oral inquiry or form of application that elicits or attempts to elicit information for a reason based wholly or partially on discrimination;”

Section 12-62(f)(2) of the Ordinance provides, in part: “It shall not be an unlawful practice for a notice or advertisement to indicate a preference, limitation or specification where such factors are bona fide occupational qualifications necessary for employment. Nor shall it be unlawful for a person to request, accept an order for, refer or hire an individual based on such a preference, limitation or specification where such factors are bona fide occupational qualifications necessary for such employment.”

Section 12-105(a) of the Ordinance provides, in part: “Any practice or act of discrimination which would otherwise be prohibited by this article shall not be deemed unlawful if it can be established that such practice or act can be justified on the basis of being reasonably necessary to the normal operation of the business or enterprise. However, a “business necessity” exception shall not be justified by the factors of increased cost to business, business efficiency, the comparative or stereotypical characteristics of one group as opposed to another or the preferences of co-workers, employers’ customers or any other person.”

THE ENFORCEMENT LANDSCAPE

The above language establishes the following:

- The Ordinance prohibits discrimination based upon an individual’s membership in nineteen protected classes;
- “Conviction record” is established as a protected class under the Ordinance;
- Employers are generally prohibited from asking about an applicant’s “protected class” status when the purpose of such inquiry (either in whole or in part) is to discriminate;
- A practice that would be prohibited by the Ordinance may not be (prohibited) when the practice can be justified as being “reasonably necessary” to the normal business operations;
- The provisions may be summarized by stating that *where there is a substantial relationship or nexus between the nature of the position applied for and an applicant’s criminal conviction, the employer may lawfully deny employment based upon that conviction.*

From an enforcement perspective, “conviction record” is a distinct type of protected class as compared with all of the other classes with the notable exception of “physical and/or mental disability”.¹ The distinctiveness of “conviction record” as a class arises out of a number of relevant attributes including, (1) the presence of subgroups within the larger (protected) class, (2) the relevance of those subgroups to the determination of whether an employer has violated the Ordinance, and (3) lack of similar (protected) class

¹ In tacit recognition of the distinctness of “physical and/or mental disability” as a protected class, the federal framework has a distinct set of laws, regulations and enforcement procedures (Americans with Disabilities Act, Rehabilitation Act of 1973, etc.) to ensure effective enforcement. No such federal framework is available for “conviction record” because it is not a protected class under the federal, state or even most municipal systems.

coverage in other jurisdictions. Taken together, these attributes influence the efficacy and feasibility of enforcement regimes. The next section will briefly discuss the attributes identified above.

SUBGROUPS WITHIN THE LARGER CLASS

First, there are myriad “subgroups” within the single class of “prior conviction”. The subgroups are determined in large part by circumstantial factors such as: (1) type of conviction, (2) individual’s age at the time of the conviction, and (3) time since conviction. Obviously, types of conviction range the full gamut of the criminal code; from retail theft to aggravated criminal sexual assault of a minor or from possession with intent to armed bank robbery. Indeed, even within one criminal conviction type, the circumstances leading to a conviction for burglary vary widely.²

An individual’s age at the time of conviction may also vary widely. More importantly, an employer’s assessment of the relevance of the conviction could be and often is influenced by the applicant’s age at the time of conviction. Many employers tend to show more lenience with bad behavior made earlier in life. Such behavior is often viewed as a consequence of immaturity and youth. However, when a candidate’s record evidences such behavior at an age where most individuals are expected to engage in mature, responsible behavior, such lenience is less likely. Thus, an individual convicted of battery resulting from a bar fight at age eighteen, may be viewed much differently than such a conviction at age forty.

Finally, the time elapsed since the conviction is another distinct but interrelated factor. Years lived without subsequent convictions tend to be considered as evidence of rehabilitation. This is particularly true where the conviction occurred decades in the past. Thus, a thirty year old conviction for drug trafficking will be viewed very differently than a conviction for a similar offense that is only two years old.

Taken together, variance within and amongst the three factors enumerated above can result in an extraordinarily broad spectrum of circumstances that would all fit under the single label “prior conviction”. So, a thirty year old conviction for retail theft where the offender was eighteen shares the same protected class status as a two year old conviction for aggravated battery against a minor when the offender was forty. Both circumstances fall under the label of “prior conviction”.

RELEVANCE OF SUBGROUPS

Second, depending on the nature of the position applied for and the applicant’s subgroup attributes, adverse decisions made *solely* on the basis of protected class membership, *may* or *may not* constitute unlawful discrimination. Indeed, each of the factors outlined in the previous section may be *legitimately* weighed by an organization in the course of deciding whether employment may be denied or rather, whether the applicant’s subgroup disqualifies him/her for the position sought. In fact, the frequency wherein an applicant’s subgroup results in a *permissible* adverse employment decision is not

² For instance, a conviction for “burglary” could result from two very different scenarios. A burglary charge could be a result from breaking in an unoccupied residential home. However, a burglary charge could result from shoplifting without the cash on hand to pay for the stolen merchandise.

insubstantial.³ By direct contrast, the number of instances in which an adverse decision that is based solely upon *race, national origin, ethnicity, religion or gender* would be *lawful* is extraordinarily low.⁴

The above distinction is an important one. Protected classes tend to be fairly homogenous – particularly regarding factors that may or may not be related to the opportunity sought. Thus, Asian-Americans cannot *legally* be divided into subgroups based upon the circumstances under which they became Asian-Americans. There is no subgroup of Mexican-Americans who may be *legally* denied employment solely on the relevance of subgroup membership to the desired position. Further, there is no subgroup of African Americans who would be statutorily barred from employment based solely on their membership in a subgroup. However, within the general protected class of “prior conviction” we have seen above that subgroup status (i.e. conviction type, age at time of conviction and time elapsed since the conviction) may have a significant impact on whether the individual is hired. Thus, the protected class of “prior conviction” is not a homogenous group and cannot reasonably be viewed as such.

UNIQUENESS OF “PRIOR CONVICTION” AS A PROTECTED CLASS

Third, there are very few jurisdictions, whether federal, state, or municipal that designate “conviction record” as a protected class. While this factor does not and should not impact the City’s commitment to retaining the class, the factor presents very real enforcement considerations. As noted above, enforcement of “conviction record” is not part of the rubric of the federal and state anti-discrimination enforcement framework. What framework does exist, often as the result of local ordinances, generally comports with the formulation provided in the fifth summary bullet-point from the section above entitled “The Enforcement Landscape”. As a result, most employers have structured internal hiring policies to comply with the prevailing formulation.

Based upon the distinctiveness of the class, comparisons with other protected classes can sometimes be less than helpful or even misleading. For instance, no legitimate business outside of certain extremely rare exceptions⁵ would consider publishing a job application that inquires into the applicant’s race, gender, national origin or religion for the purposes of determining an applicant’s eligibility for a vacant position. Such an inquiry is almost never *lawfully* relevant to an applicant’s qualifications. However, when a hospital or school evaluates a job applicant for certain positions, the state of Illinois has mandated by law the prohibiting of employment of individuals with certain criminal convictions. Thus, in the case of “conviction record” such an inquiry is by necessity, *lawful*.

ENFORCEMENT OF THE AMERICANS WITH DISABILITIES ACT

The Americans with Disabilities Act (“ADA”) prohibits discrimination against individuals with physical and/or mental disabilities. Unlike other protected classes, an individual within the class may be legally denied employment, if that individual is unable perform the essential and marginal job functions with or without reasonable accommodation. In a way similar to “prior conviction”, individuals within certain subgroups of the class may be lawfully denied employment on the basis of the relationship between their

³ The term denotes a rate of occurrence higher than rare but certainly less frequent than a majority.

⁴ There are a few notable exceptions, mostly from the entertainment sector (i.e. acting, modeling, etc). For instance, advertisements for performance roles in theatrical, television or motion picture productions often specify race and/or gender.

⁵ (i.e. entertainment industry mentioned in note 3)

subgroup status and the nature of the position applied for. As such, the ADA provides a useful albeit imperfect comparator as a protected class with many similarities to the “prior conviction” protected class. Rather than having subgroups based upon type of conviction, etc., relevant subgroups under the ADA may be characterized as: type of disability, severity of job related impairment, and the availability/reasonableness of measures that will mitigate the job-relevant impairment. Based upon the distinctiveness of “physical and/or mental disabilities” as protected classes, lawmakers opted to create a distinct approach to enforcement.

Employers that are covered by the ADA are obliged to develop what is typically referred to as an “Essential and Marginal Job Function Analysis” (“Essentials and Marginals”) for each position within their organization. The analysis first identifies each of the physical and mental requirements of the position such as “frequently requires lifting objects weighing 50 lbs or more” or “requires long periods of intense mental focus and concentration.” Second, the analysis classifies each requirement according to whether the requirement is part of the “essence” of the position (i.e. essential) or more peripheral or “marginal” in nature.

The ADA bars employers from directly inquiring as to whether a job applicant has a physical or mental disability. Rather, the ADA requires that the applicant be given opportunity to review the Essentials and Marginals for the applied-for position. The employer is then permitted to ask whether, given the Essentials and Marginals, the applicant believes he or she is able to perform the functions with or without reasonable accommodation. If the answer is affirmative, then the employer’s inquiry must stop.⁶ Only after issuing a contingent offer, may the employer reinitiate the conversation.

Specifically, the employer may then inquire (normally as part of a pre-employment physical) whether and what type of accommodation is required to fulfill the Essentials and Marginals. Once the accommodation is identified, the employer must state whether it deems the accommodation “reasonable”. If so, the accommodation must be made. If not, the employer is obligated to offer an alternative accommodation that (1) it deems to be reasonable and (2) allows the applicant to successfully perform the Essentials and Marginals. This negotiation (affectionately known as the “ADA dance” to HR professionals) continues as long as both parties believe that a reasonable accommodation is achievable. When one or both parties conclude that a mutually agreeable accommodation is not achievable, then the applicant may file a charge with the Equal Employment Opportunity Commission (“EEOC”) or other appropriate state or local administrative enforcement agency. That agency will then determine whether a reasonable accommodation (given the employer’s size and resources) exists that would enable the applicant to successfully perform the Essentials and Marginals.

While there are significant distinctions between “physical and/or mental disability” and “prior conviction” as protected classes, the existence of legally relevant subgroups or subclasses within the broader classes make the drawing of comparisons highly instructive.⁷ Note that the ADA’s approach to enforcing the

⁶ If the answer is negative, then the applicant has basically indicated that he or she is not qualified for the position. As such, the employer is no longer obligated to consider the applicant for that position.

⁷ One significant distinction that was alluded to in an earlier section bears repeating. As a federal law, the ADA generally covers all private U.S. businesses with workforces of at least 50 employees. Because of this broad scope, the businesses throughout the country were required to modify hiring practices to achieve compliance. So, if a particular business had locations in each state, each location was required to implement similar ADA-compliant procedures.

protected class is not based upon the attempt to maintain parity with other fundamentally distinct protected classes, but based upon the particular characteristics and challenges of the class. Thus, the enforcement framework appears to be specifically tailored to balance the needs of the protected class with the legitimate business concerns of those with whom they will interact.

CURRENT ENFORCEMENT PROCEDURES

It is against the above-described landscape that the Urbana Human Relations Office (“HRO”) has enforced the Ordinance’s prohibition of discrimination against individuals based upon their prior criminal convictions. As an initial matter, HRO enforcement actions taken against employers who have either failed to hire or terminated individuals based upon “conviction record” have been relatively successful.⁸ That said, however, the HRO has not imposed a mandate as to what specific wording is or is not allowed on applications. Consequently, employers have not been sanctioned for requiring job applicants to disclose prior convictions if that was done for the purposes of determining whether the individual has a disqualifying conviction.

Enforcement of such a prohibition would be a marked departure from current practice that would, consequently, require many Urbana employers to change hiring practices in regards to individuals with prior convictions. Indeed, because such a consequence would have a substantial impact on the community, it would be inappropriate for HRO to modify current enforcement without further input and direction.

“BAN THE BOX”

This enforcement approach would ban all covered employers from asking about prior convictions on job applications and/or at any stage in the hiring process prior to a contingent offer of employment. A major advantage of this approach is of a similar nature to the issue mentioned in footnote 8. Charges filed under this approach would involve little or no factual dispute. This is because charges would only be filed where prior conviction leading to the rejection of the complainant would have come to light as a direct result of the complainant being selected as the most qualified applicant. In sum, the only remaining issue in such cases would be whether there was a nexus between the job and the prior conviction. Furthermore, the complainants under this approach would be highly motivated because, but for the employer’s decision, the position would have been theirs.

The disadvantage of this approach is that it would represent a marked departure in Urbana’s and most other communities’ approach. Thus, it is not inconceivable that multi-site employers would need a separate set of applications and procedures when hiring in Urbana. On a related note, employers would in certain instances invest time (interviewing, reference checking) and resources (testing, travel expenses) into applicants who either cannot or will not be hired because of their prior conviction. Another disadvantage - or rather risk - is that employers would surreptitiously run background checks on all

⁸ The rate of settlements achieved under this protected class is well above rates for all other classes. This is due in large part to the fact that certain factual disputes that would typically exist in a discrimination claim are often undisputed in prior conviction cases. For instance, if an individual files a charge after being rejected for a position for which he or she had received a conditional offer of employment, there is no point for the employer to argue that the individual was not the most qualified. The only true issue is whether there is a substantial relationship between the position offered and the applicant’s prior conviction. By contrast, in a typical *race* charge, most of the time-intensive factual inquiry focuses on whether the Complainant was more qualified than the individual selected.

applicants and find pre-textual reasons for excluding all individuals with prior convictions. Such behavior would be difficult to detect because applicants would be excluded at the preliminary stages of selection where less time investment equals less motivation to claim or even suspect discriminatory conduct.

One approach to resolving some of these difficulties might be to limit coverage to employers who are not statutorily prohibited from hiring individuals with certain prior convictions. However, defining the exact contours of the exempted class of employers may be somewhat difficult. For instance, would we exempt employers whose bonding requirements limit their ability to hire individuals with certain prior convictions? Would we exempt ambulatory clinics that may not be statutorily prohibited from hiring individuals with prior convictions? What if a non-exempted clinic is a part of a larger, exempted, employer?

ESSENTIALS AND MARGINALS

Another approach would be modeled after ADA enforcement. The approach would require employers to develop a document similar to the Essential and Marginal Job Function Analysis currently required under the ADA. However, rather than list the physical and mental requirements of each position, this document would list the types of convictions that would disqualify an individual from employment based upon those convictions' *substantial relationship with specifically defined position responsibilities*. More simply, employers would be obliged to develop and disclose a distinct list of disqualifying convictions for each position based upon the duties of that position. While the employers would be free to provide this list at any point in the application process, employers would no longer be permitted to ask about prior convictions on the job application. Rather, in a fashion similar to the ADA, employers may inquire as to whether, based upon the "essentials and marginals" of the applied-for position, the applicant has any prior convictions that may disqualify him/her from the position. If the applicant answers affirmatively, the employer should give the applicant an opportunity to provide any information that would (1) provide a more complete view of the circumstances leading to the conviction and/or (2) address the risk(s) associated with hiring the individual, which may include but is not limited to factors such as: age at the time of conviction, time elapsed since the conviction, and/or post-conviction relief.⁹ If employer concludes that the additional information does not sufficiently address the risk, then employer may choose to no longer consider the candidate.

There are several distinct advantages to this approach. First, the approach mimics the ADA process. This is an advantage because a vast majority of covered employers will be familiar with both the substantial and procedural requirements of the ADA. As such, raising employer awareness regarding the new enforcement approach may be accomplished largely by referring to similar requirements in the ADA. Modeling the enforcement approach after the ADA also helps to compensate for the lack of an underlying state and/or federal legal framework. Thus, to the extent that the approach follows the ADA, novel issues and disputes arising from enforcement actions may be fruitfully analogized to similar disputes in the relatively well-settled terrain of the ADA.

⁹ For example, after a certain statutorily determined time has elapsed, certain ex-offenders may apply for a "Certificate of Good Conduct". If an employer hires an individual with such a Certificate, the employer enjoys a degree of immunity for negligent hiring suits arising from the selection of the individual.

A second advantage of this approach is that the *ex ante* development and exchange of *relevant* information will tend to save time and resources of both employers and candidates. From the employer's perspective, careful development of the "Essentials and Marginals" will necessitate examination of the job responsibilities to determine which bear a substantial relationship to felony convictions. The employer will have already developed the arguments that it believes justifies disqualification of individuals with certain convictions. Indeed, in many cases the employers may even be guided by examples and analyses published by the Urbana Human Relations Office. The result for employers is more certainty regarding permissible and impermissible actions under the Ordinance.

From the candidates' perspective, knowing whether a particular conviction disqualifies him from an employment opportunity may allow him to expend time and resources pursuing positions for which his conviction will not constitute a barrier. Conversely, knowing that an employer regards a particular conviction as disqualifying for a position may prompt the candidate to mount an affirmative challenge to this assessment, prior to becoming a formal candidate. Such a challenge could be raised and decided expeditiously because the only determinative issue would be whether the employer can establish a substantial relationship between the conviction and available position.

As is the case with the ADA, the most significant disadvantage to this enforcement approach emerges from the requirement for employers to develop "Essentials and Marginals" for each position. The requirement to identify convictions that have a substantial relationship to a position's duties represents a potentially daunting task even for highly skilled human resources professionals. Such a task would be significantly more difficult for a company possessing a relatively modest human resources function. In addition to the need for competent human resources/legal staff, covered employers would need a reasonable amount of time to review their entire position roster, identify job responsibilities bearing a substantial relationship to certain criminal convictions, identify and classify the relevant criminal convictions. Indeed, even with highly qualified staff, the sheer amount of work involved would be considerable.

Two strategies could significantly mitigate the burden to employers. First, the effective date of the new requirements could be delayed for one (1) calendar year in order to provide employers with additional time to achieve compliance. Second, the Human Relations Office could provide comprehensive technical guidance to local employers. The guidance would ideally take many forms such as but not limited to providing advisory opinions for common occupation types, and holding compliance workshops. While such measures would not completely offset the expense and resources of compliance, the measures would certainly reduce the overall burden.

A VOLUNTARY COMPLIANCE PROGRAM

Another approach would encourage or even incent employers to voluntarily choose to implement one of the above approaches (inquire into background at the contingent offer or provide a disclosure statement about disqualifying convictions, etc.). Employers who voluntarily choose to implement such policies could be given special recognition or even afforded certain *rebuttable* presumptions if HRO charges are filed against them. Further, the Human Relations Commission and HRO could engage in a comprehensive effort to educate employers on the costs, both legal and societal, of discrimination against individuals with prior convictions.

This approach has pretty obvious advantages and disadvantages. The advantage is that there would not be a requirement of any employer to modify any current practice so long as that practice is consistent with current enforcement. The disadvantage is clear. Voluntary systems of compliance are only effective where the targeted participants are given significant legal incentives to participate.¹⁰

CONCLUSION

As stated above, the purpose of this memo is to begin the thoughtful articulation of various issues related to changing HRO's enforcement of "conviction record" as a protected class under the Urbana Human Rights Ordinance. Further discussion will more fully explore many of the ideas covered here.

¹⁰ One analogous example is the Department of Health and Human Service's Compliance Program Guidelines for Hospitals which are largely based on the Department of Justice's Sentencing Guidelines.

Summary of Proposed Rule

In order to increase the effectiveness of the enforcement of the City of Urbana’s prohibition of discrimination based upon “prior conviction”, the Human Relations Office ~~proposes the following rule~~ provides the following guidance:

1. Coverage

- The proposed rule exempts employers who are restricted based upon state and/or federal law from hiring individuals with certain prior convictions for specific positions. For example, hospitals and nursing homes covered under the Health Care Worker Background Check Act [225 ILCS 46], which prohibits covered employers from hiring individuals with certain convictions for certain positions are exempt from coverage under the rule when hiring for those certain positions. Thus, these employers are classified as “exempt”.
- All other private employers are classified as “non-exempt” or “covered”.

2. Covered Employers

- Under the proposed rule, covered employers may deny employment to individuals based upon a prior conviction *only when ~~the prior conviction bears a substantial relationship or nexus to the specific position for which the applicant has applied~~ such denial is reasonably necessary to the normal operations of the business or enterprise. Such denials shall not be justified by the factors of increased cost to business, business efficiency, the comparative or stereotypical characteristics of one group as opposed to another or the preferences of co-workers, employers’ customer or any other person.*
- Under the proposed rule, covered employers are prohibited from asking whether an applicant has a prior conviction until a contingent offer of employment is made.
- As such, covered employers may not inquire about conviction status on employment applications. Covered employers will have (1) one year from the date of enactment of the proposed rule to comply with this requirement.

- While employers may not inquire about prior conviction until a contingent offer of employment is made, employers may, at any time, provide accurate information regarding (1) the duties and responsibilities of the applied-for position, as well as (2) which convictions may disqualify an applicant from employment based upon the duties and responsibilities and (3) that upon extension of a conditional offer, the employer intends to run a criminal background check (“CBC”) on the applicant.
- Covered entities who perform CBC on potential employees, must abide by the following guidelines:
 1. The applicant must be given a “Notice of Rights” prior to the performance of a CBC.
 2. The applicant must sign a document acknowledging receipt and understanding of the “Notice of Rights”.
 3. The employer must provide written notice if it plans to take any adverse action (i.e. deny employment) based upon information gained in the CBC. Such written notice must (1) provide a copy of the CBC report to the applicant, (2) identify the specific conviction that led to the proposed adverse action, (3) clearly explain how the identified conviction is *substantially related* to the position applied-for and (4) notify the applicant of his/her right to appeal the adverse decision to the Urbana Human Relations Commission. Further, the employer must provide the applicant with a *reasonable opportunity to dispute the accuracy or completeness of any information* contained in the CBC report. Such reasonable opportunity will be no less than *forty-eight (48) hours* from the time at which written notice of an adverse decision was provided to the applicant.
 4. The determination as to whether an adverse action or denial of employment is reasonably necessary to the normal operations of business or enterprise should comprise an individual assessment based upon the following factors:
 - The facts or circumstances surrounding the offense or conduct;
 - The number of offenses for which the individual was convicted;
 - Age at the time of conviction, or release from prison;

- Evidence that the individual performed the same type of work, post-conviction, with the same or a different employer, with no known incidents of criminal conduct;
 - The length and consistency of employment history before and after the offense or conduct;
 - Rehabilitation efforts, e.g., education/training;
 - Employment or character references and any other information regarding fitness for the particular position;
 - Whether the individual is bonded under a federal, state, or local bonding program.
- Upon extending a contingent offer of employment, covered employers are required to provide a “Notice of Rights” to the applicant who is the subject of the CBC. The “Notice of Rights” will inform the applicant of their rights under the proposed rule.

3. Exempt Employers

- Under the proposed rule, exempt employers may ask whether an applicant has a prior conviction at any time during the application process, except that such an employer must provide notice to the applicant at the time of inquiry indicating (1) the specific section or provision in state or federal law that mandates exclusion of individuals having certain prior convictions, and (2) the right of the applicant to contact the Urbana Human Relations Commission should that applicant have any questions or concerns regarding the application of the provision to the position for which he/she has applied.

4. All Employers

- The Urbana Human Relations Office will provide technical assistance to any Urbana business seeking to ensure compliance with the proposed rule. Such assistance shall include, but is not limited to: (1) providing electronic template of all notices required under the proposed rule, and (2) assistance in determining

which, if any, convictions may bear a substantial relationship to particular positions.

- Any employer following guidance in accordance with technical assistance provided by the Urbana Human Relations Office shall be presumed to be in compliance with the proposed rule. Such a presumption shall be rebuttable only upon clear and convincing evidence of non-compliance.

PROPOSED RULE

**THE URBANA HUMANA RELATIONS ~~COMMISSION RULES~~ OFFICE GUIDANCE
GOVERNING INQUIRY INTO AND CONSIDERATION OF PRIOR ARREST OR
CONVICTION RECORD BY EMPLOYERS**

PREAMBLE

The Human Relations Commission was created by the City Council of the City of Urbana to secure an end to discrimination, including but not limited to discrimination by reason of age, color, creed, class, family responsibilities, marital status, matriculation, national origin, personal appearance, physical and mental disability, political affiliation, race, religion, sex, sexual orientation, prior arrest or conviction record, source of income, or any other discrimination based upon categorizing or classifying a person rather than evaluating a person's unique qualifications relevant to opportunities in, but not limited to, employment, housing, places of public accommodation, and credit or commercial transactions.

The following enforcement ~~rule is adopted~~ guidance is provided pursuant to Section 12-19 of the Code of Ordinances of the City of Urbana. This rule governs guidance seeks to provide information clarifying the standards upon which Human Relations Office will rely in investigating and evaluating whether the Human Rights Ordinance's prohibition against discrimination based upon circumstances under which Urbana employers may inquire about and/or consider "prior arrest or conviction record" in the evaluation of applicants for employment has been violated.

Please note that the Human Relations Commission, the municipal commission charged with issuing the final determination in all enforcement actions has clearly articulated that any consideration of prior arrest or conviction record must be limited to the underlying conduct implicated by the conviction and not the fact of the conviction itself. Rather, employers may disqualify candidates based upon conduct, not conviction record.

APPLICATION

1. Applicable Law

Section 12-39 of the Urbana Human Rights Ordinance defines discrimination in part as:

Any practice or act which is unlawfully based wholly or partially on the...*prior arrest or conviction record* of any individual, or any subclass of the above groups [Emphasis added]

Section 12-62 of the Urbana Human Rights Ordinance reads, *inter alia*:

- (a) *By an employer.* It shall be an unlawful practice for an employer to do any of the following acts for a reason based wholly or partially on discrimination:
 - (1) To fail or refuse to hire, to discharge or to accord adverse, unlawful and unequal treatment to any person with respect to his/her application, hiring, training, compensation, tenure, upgrading, promotion, layoff or any other terms, conditions or privileges of employment;
 - ...
- (b) *By an employment agency.* It shall be an unlawful practice for an employment agency to do any of the following acts for a reason based wholly or partially on discrimination:

- (1) To fail or refuse to refer for employment any individual, or otherwise to discriminate against any individual in any way which would deprive or tend to deprive such individual of an employment opportunity;

...

- (c) *By an employer or employment agency.* It shall be an unlawful practice for an employer or employment agency to make or use a written or oral inquiry or form of application that elicits or attempts to elicit information for a reason based wholly or partially on discrimination; to make or keep a record of or disclose such information, except that the collection and reporting of such information shall not be unlawful if done for equal opportunity or affirmative action purposes pursuant to any local, state or federal government equal opportunity or affirmative action program.

Section 12-105(a) of the Urbana Human Rights Ordinance reads, *inter alia*:

- (a) Any practice or act of discrimination which would otherwise be prohibited by this article shall not be deemed unlawful if it can be established that such practice or act can be justified on the basis of *being reasonably necessary to the normal operation of the business or enterprise.* However, a "business necessity" exception shall not be justified by the factors of increased cost to business, business efficiency, the comparative or stereotypical characteristics of one group as opposed to another or the preferences of co-workers, employers' customers or any other person. [italics added]

2. Exempt Employers and Positions

Those employers whose hiring/employment practices are governed by either federal and/or state laws that restrict them from hiring persons with certain convictions for certain positions are exempted from this provision as it would pertain to that position and potential employee. If an employer can verify that they are required by law to screen applicants for certain convictions and/or are barred from hiring person with certain convictions, they will be deemed "exempt" employers. However, this exemption applies only to those "exempt positions" and their correspondingly excluded convictions as articulated in state or federal laws. An employer may not ~~get~~ receive a plenary exemption for all positions in a particular business for positions/convictions that are not specifically enumerated in state or federal law merely because other positions in their business are exempted.

3. Application of Law to Exempt Employers

Exempt employers may inquire as to whether an applicant for an exempt position has a prior conviction at any time during the application process. However, should that employer either inquire about prior convictions or plan to use knowledge of a prior conviction in hiring determinations (regardless of how such knowledge was obtained), the employer must provide notice to the applicant at the time of inquiry indicating (1) the specific section or provision of federal or state law that prohibits hiring of certain individuals have certain prior convictions, and (2) the right of the applicant to contact the Urbana Human Relations Commission should said have applicant have any questions or concerns regarding the application of the provision to the position for which he/she has applied. Any employer performing a criminal background check must do so in conformity with the rules stated in section 5 below.

4. Application of Law to Non-Exempt Employers

The following rules apply to all non-exempt employers:

- a. Non-exempt employers may deny employment to individuals based upon a prior conviction only when based upon the conduct or circumstances of the conviction or the fact of the prior conviction, bears a substantial relationship or nexus to the specific position for which the applicant has applied the employer established that such denial is reasonably necessary to the normal operation of the business or enterprise;
- b. The determination as to whether an adverse action or denial of employment is *reasonably necessary to the normal operations of business or enterprise* should comprise an individual assessment based upon the following factors:
 - The facts or circumstances surrounding the offense or conduct;
 - The number of offenses for which the individual was convicted;
 - Age at the time of conviction, or release from prison;
 - Evidence that the individual performed the same type of work, post-conviction, with the same or a different employer, with no known incidents of criminal conduct;
 - The length and consistency of employment history before and after the offense or conduct;
 - Rehabilitation efforts, e.g., education/training;
 - Employment or character references and any other information regarding fitness for the particular position;
 - Whether the individual is bonded under a federal, state, or local bonding program.
- c. Non-exempt employers are prohibited from asking whether an applicant has a prior conviction until a conditional offer of employment is made;
- d. Non-exempt employers may not inquire about conviction status on employment applications. Non-exempt employers have one (1) year from the date of enactment of the proposed rule to comply with this requirement and amend any job applications or documentation as necessary;
- e. Non-exempt employers may, at any time, provide to applicants or potential applicants accurate information regarding the following:
 - (1) the duties and responsibilities of the applied-for positions; and
 - (2) whether, upon extension of a conditional offer, the employer intends to run a criminal background check (“CBC”) on the applicant.

5. Criminal Background Checks

Exempt employers may conduct a criminal background (“CBC”) check upon the submission of an application by an applicant, provided notice is given to the applicant at the time of submission of the application that the employer may run a CBC.

Non-exempt employers may only run a CBC upon extension of a conditional offer.

Both exempt and non-exempt employers who intend to run a CBC on an applicant must abide by the following rules:

- a. All employers must provide a “Notice of Rights” to the applicant informing the applicant of his/her rights under these rules;
- b. The applicant must be given a “Notice of Rights” prior to the performance of the CBC;
- c. The applicant must be informed that he/she has the right to provide evidence of rehabilitation to the employer;
- d. The applicant must sign a document acknowledging receipt and understanding of the “Notice of Rights”.

Non-exempt employers must provide written notice to applicants if they plan to take any adverse action, such as denying employment, based upon information gained in the CBC. Such written notice must:

- a. Provide a copy of the CBC report to the applicant;
- b. Identify the specific conviction that led to the proposed adverse action;
- c. Clearly explain how the identified conviction is substantially related to the position applied for; and
- d. Notify the applicant of his/her right to appeal the adverse decision to the Urbana Human Relations Commission.

Further, non-exempt employers must provide the applicant with a reasonable opportunity to dispute the accuracy or completeness of any information contained in the CBC report. Such reasonable opportunity will be no less than forty-eight (48) hours from the time at which the written notice of an adverse decision was provided to the applicant.

6. Assistance to Employers

The Urbana Human Relations Office will provide technical assistance to any Urbana business seeking to ensure compliance with these rules. Upon request the HRO will:

- a. Provide electronic templates of all notices required under the rule;
- b. Assistance in determining if an employer is exempt or non-exempt;
- c. Assistance in determining which, if any, convictions may bear a substantial relationship to particular positions; and
- d. Other assistance as appropriate.

7. Good Faith

Any employer acting in accordance with these rules shall be presumed to have acted in good faith. Any employer following guidance in accordance with the technical assistance provided by the Urbana Human Relations Office shall be presumed to be in compliance with the proposed rule. Such a presumption shall be rebuttable only upon clear and convincing evidence.

COMPANY	EE	AA	% AA	WN	% WN	LTN	% LTN	ASIAN	% ASIAN	NA	% NA	OTHER	%OTHER	MIN	% MIN	EEO	HRSS POLICY	STAFF REC
BATTERY SOLUTIONS LLC (2013)	86	0	0.00%	22	25.58%	9	10.47%	1	1.16%	1	1.16%	0	0.00%	11	12.79%	YES	YES	1 YR
WOOLARD MKTG CONSULTANTS (2013)	3	0	0.00%	3	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	YES	YES	2 YRS

SECTION II. Policies and Practices

Description of EEO Policies and Practices		YES	NO
A.	Is it the Company's policy to recruit, hire, train, upgrade, promote and discipline persons without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual preference, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income ?	X	
B.	Has someone been assigned to develop procedures, which will assure that the EEO policy is implemented and enforced by managerial, administrative, and supervisory personnel? If so, please indicate the name and title of the official charged with this responsibility. Name: <u>Jan Andrews</u> Title: <u>HR</u> Telephone: <u>248 446 3001</u> Email: <u>Jan@batteryrecycling.com</u>		
C.	Does the company have a written Equal Employment Opportunity plan or statement? Note: If no, a copy of an E.E.O statement is enclosed. You must attach an EEO Statement in order to be considered eligible to do business with the City of Urbana. Questions? (217) 384-2466 or terent@city.urbana.il.us.	X	
D.	Has the company developed a written policy statement prohibiting Sexual Harassment? You must attach a copy of your company's Sexual Harassment Policy in order to be considered eligible to do business with the City of Urbana.	Y	
E.	Have all recruitment sources been notified that the company will consider all qualified applicants without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
F.	If advertising is used, does it specify that all qualified applicants will be considered for employment without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
G.	Has the contractor notified all of its sub-contractors of their obligations to comply with the Equal Opportunity requirements either in writing, by inclusion in subcontracts or purchase orders?	X	
H.	Is the company a state certified minority/women owned business? If yes, please attach a copy of state certification.		X
I.	Does the company have collective bargaining agreements with labor organizations?		X
J.	Have the labor organizations been notified of the company's responsibility to comply with the Equal Employment Opportunity requirements in all contracts with the City of Urbana?		N/A
K.	Does your company perform construction, rehabilitation, alteration, conversion, demolition or repair of buildings, highways or other improvements to real property? (If yes, please complete Table B.)		X
L.	Are you currently seeking to renew an existing or expired Urbana EEO certification? (If yes, you need to complete Table C.)		X

SECTION III. Employment Information

Please complete the company work force analysis on the bottom of this page. Use the number of employees as of the most recent payroll period. **You must complete this form in its entirety, as instructed and submit your organization's (1) EEO Statement and (2) Sexual Harassment Policy in order to be eligible to do business with the City of Urbana.** For detailed descriptions of the Job Classifications see attached descriptions. If minorities and females are currently underepresented in your workforce, please attach a copy of an explanation of your plan to recruit and hire qualified minorities and females.

TABLE A - TOTAL CONTRACTOR/VENDOR WORKFORCE

Job Categories	Overall Totals		White (Not of Hispanic Origin)		Black or African-American (Not of Hispanic Origin)		Hispanic or Latino		Asian or Pacific Islander		American Indian or Alaskan Native	
	M	F	M	F	M	F	M	F	M	F	M	F
Officials & Mgrs	11	6	10	6					1			
Professionals												
Technicians				1								
Sales Workers	3	3	3	3								
Office & Clerical	4	10	4	10								
Craft Workers (Skilled)												
Operatives (Semi-Skilled)	1		1									
Laborers (Unskilled)	45	3	35	3			9				1	
Service Workers												
TOTAL	64	22	53	22			9		1		1	

M = MALE, Column B is sum of Rows D, F, H, J and L.
 F = FEMALE, Column C is sum of Rows E, G, I, K and M.
 Date of above Data: 11/25/13

TABLE B* - EMPLOYEES TO BE ASSIGNED TO CITY OF URBANA CONTRACT

Job Categories	TOTAL EMPLOYEES		BLACK EMPLOYEES		HISPANIC EMPLOYEES		OTHER MINORITY EMPLOYEES	
	M	F	M	F	M	F	M	F
Officials & Mgrs								
Professionals								
Technicians								
Sales Workers		1						
Office & Clerical		2						
Craft Workers (Skilled)								
Operatives (Semi-Skilled)								
Laborers (Unskilled)	2							
Service Workers								
TOTAL	2	3						

*Totals included under Table B should be a projection of numbers of persons to be employed in the performance of the City contract.

For Contractors:

Data provided in Table B will be verified by worksite inspections.

TABLE C WORKFORCE TURNOVER SINCE PREVIOUS EEO REPORT**

Job Categories	TOTAL EMPLOYEES SEPARATED		MINORITY EMPLOYEES SEPARATED		TOTAL EMPLOYEES HIRED		MINORITY EMPLOYEES HIRED	
	M	F	M	F	M	F	M	F
Officials & Mgrs					5	1	1	
Professionals								
Technicians								
Sales Workers	1							
Office & Clerical		4			1			
Craft Workers (Skilled)								
Operatives (Semi-Skilled)								
Laborers (Unskilled)	38				10		4	
Service Workers								
TOTAL	39	4			16	1	5	

SECTION IV. Certification

By signing below, the company certifies that it has answered all of the foregoing questions truthfully to the best of its knowledge and belief and agrees that it/he/she will comply and abide by the City of Urbana's Code of Ordinances (Section 2-

(18)

 Signature

Andrew Martlock 11/25/13
 Typed Name and Title CFO Date

SECTION V. Verification

Prior to submitting this form, please check the answers to the following questions to verify your completion of this form:

1. Did you fill in all of the appropriate boxes in the table in Section III, including the "TOTAL" row?

YES NO

2. Have you enclosed your company's EEO statement?

YES NO

3. Have you enclosed your company's Sexual Harassment policy?

YES NO

DEFINITIONS OF TERMS LISTED ON THE WORKFORCE STATISTICS FORM

(See previous Page)

DESCRIPTION OF RACE/ETHNIC CATEGORIES

Race /ethnic designations as used by the Department do not denote scientific definitions of anthropological origins. For the purposes of this report, an employee may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. However, no person should be counted in more than *one* race/ethnic group. The race/ethnic categories for this report are:

White (Not of Hispanic origin). All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Black of African-American (Not of Hispanic origin). All persons having origins in any of the Black racial groups of Africa.

Hispanic or Latino. All persons of Mexican, Puerto Rican, Cuban, Central of South American, or other Spanish culture or origin, regardless of race.

Asian or Pacific Islander. All persons having origins any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands and Samoa.

American Indian or Alaskan Native. All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

DESCRIPTION OF JOB CATEGORIES

Each employee should be counted in only one job category. Select the category containing the jobs most similar to that performed by the employee. The jobs listed in each category are intended to provide an example, not a complete list, of all job titles falling into that category.

Officials and managers. Occupations requiring administrative and managerial personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of firm's operations. Includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents and buyers, railroad conductors and yard masters, ship captains, mates and other officers farm operators and managers, and kindred workers.

Professionals. Occupations requiring either college graduation or experience of such kind and amount as to provide a comparable background. Includes: accountants and auditors, airplane pilots and navigators, architects, artists, chemists, designers, dietitians, editors, engineers, layers, librarians, mathematicians, natural scientist, registered professional nurses, personnel and labor relations specialist, physical scientist, physicians, social scientist, teachers, surveyors and kindred workers.

Technicians. Occupations requiring a combination of basic scientific knowledge and manual skill which can be obtained through 2 years of post high school education, such as is offered in many technical institutes and union colleges, or through equivalent on-the-job training. Include: computer programmers, drafters, engineering aides, junior engineers, mathematical aides, licensed, practical or vocational nurses, photographers, radio operators, scientific assistants, technical illustrators, technicians (medical, dental, electronic, physical science), and kindred workers.

Sales. Occupations engaging wholly or primarily in direct selling. Includes: advertising agents and sales workers, insurance agents and brokers, real estate agents, and brokers, stock and bond sales workers, demonstrators, sales workers and sales clerks, grocery clerks, and cashiers/checkers, and kindred workers.

Office and clerical. Includes all clerical-type work regardless of level of difficulty, where the activities are predominantly non manual though some manual work not directly involved with altering or transporting the products is included. Includes: bookkeepers, collectors (bills and accounts), messengers and office helpers, office machine operators (including computer), shipping and receiving clerks, stenographers, typists and secretaries, telegraph and telephone operators, legal assistants, and kindred workers.

Craft workers (skilled). Manual workers of relatively high skill level having a thorough and comprehensive knowledge of the processes involved in their work. Exercise considerable independent judgment and usually receive an extensive period of training. Includes: the building trades, hourly paid supervisors and lead operators who are not members of occupations, compositors and typesetters, electricians, engravers, painters (construction and maintenance), motion picture projectionists, pattern and model makers, stationary hand painters, coaters, bakers, decorating occupations, and kindred workers.

Operatives (semiskilled). Workers who operate machine or processing equipment or perform other factory-type duties of intermediate skill level which can be mastered in a few weeks and require only limited training. Includes: apprentices (auto service and stitchers, dryers, furnace workers, heaters, laundry and dry cleaning operatives, milliners, mine operatives and laborers, motor operators, oils and greasers (except auto), painters (manufactured articles), photographic process workers, truck and tractor drivers, knitting, looping, taping and weaving machine operators, welders and flame cutters, electrical and electronic equipment assemblers, butchers and meatcutters, inspectors, testers and graders, handpackers and packagers, and kindred workers.

Laborers (unskilled). Workers in manual occupations which generally require no special training who perform elementary duties that may be learned in a few days and require the application of little or no independent judgment. Includes: garage laborers, car washers and greasers, groundskeepers and gardeners, farmworkers, stevedores, wood choppers, laborers performing lifting, digging, mixing, loading and pulling operation and kindred workers.

Service workers. Workers in both protective and nonprotective service occupations. Includes: Attendants (hospital and other institutions, professional and personal service, including nurses aides, and orderlies), barbers, charworkers and cleaners, cooks, counter and fountain workers, elevator operators, firefighters and fire protection, guards, doorkeepers, stewards, janitors, police officers and detectives, porters, waiters and waitresses, amusement and recreation facilities attendants, guides, ushers, public transportation attendants, and kindred workers.

TERM OF EMPLOYMENT

Nothing contained in this manual is to be construed as a guarantee or promise of continued employment. Unless there is an express written and duly authorized contract to the contrary, all employment with BSI is on an "at will" basis. This means that either the employee or the Company may terminate the employment relationship at any time for any lawful reason or for no reason, with or without cause, with or without notice. No one, including an officer of the Company or a Manager, has the authority to make any commitment for employment which is other than terminable at will, with or without cause, except with prior approval of Executive Management. Moreover, no such commitment, agreement or understanding will be valid, effective or binding unless it is in writing and signed by the President or Executive Vice President of the Company.

STATEMENT OF EQUAL OPPORTUNITY AND POLICY AGAINST HARASSMENT

BSI is committed to providing equal opportunity in employment and to prohibiting all forms of unlawful discrimination and harassment. All employment decisions, policies and practices will comply with applicable federal, state and local anti-discrimination laws. In addition, BSI continues to seek out, employ, promote and compensate based on ability, as demonstrated by performance, qualified individuals of all racial groups, religions, ages and national origins, without regard to gender, marital status, disability or any other legally protected status.

Further, BSI provides to qualified individuals with disabilities, of which BSI is aware, reasonable accommodations, which do not impose an undue hardship on BSI or jeopardize the safety of other employees or our customers or suppliers. With regard to an Employee's religious observances, practices and beliefs, of which BSI is aware, BSI endeavors to provide reasonable accommodations, which do not impose an undue hardship on BSI.

BSI will not engage in or tolerate unlawful discrimination or any form of unlawful harassment on account of a person's sex, age, race, color, religion, sexual preference or orientation, marital status, national origin, ancestry, citizenship, military status, veteran status, disability or membership in any other legally protected class of individuals, provided BSI knew or should have known of such conduct. We also will abide by federal, state and local prohibitions against other forms of discrimination not specifically mentioned here.

In addition, BSI is committed to providing a work environment that is characterized by professionalism and mutual respect. Consequently, BSI strictly prohibits all forms of behavior, conduct and speech which have the effect of creating an intimidating or hostile environment as a result of another's sex, age, race, color, religion, marital status, national origin, ancestry, citizenship, military status, veteran status, disability or membership in any other legally protected class of individuals.

In particular, harassment on account of another's sex, which is a form of illegal sex discrimination, is an example of prohibited conduct. Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual or hostile nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment;
- Submission to or rejection of such conduct by individuals is used as the basis for employment decisions affecting such individual;
- Such conduct, **if unwelcome**, has the purpose or effect of interfering unreasonably with an individual's work performance or of creating an intimidating, hostile, abusive or offensive working environment. Examples of such conduct may include (but are not limited to): sexual bantering, "jokes" and "teasing"; off-color language or jokes; sexual flirtations, advances or propositions; requests for sexual favors; verbal abuse of a sexual nature; verbal commentaries about an individual's body, appearance or sexuality; sexually-degrading words used to describe individuals; displays of sexually-explicit or sexually-suggestive objects, pictures, etc.; unwelcome physical contact, such as patting, pinching or brushing against another person's body; and using sexually-oriented or degrading gestures or other nonverbal communications such as leers, gawks and the like.

Similarly, harassment on account of any other protected status, such as **race, national origin, ancestry or disability** (for example, conduct or comments which reflect negatively upon or disparage any protected group, even if the conduct or comments are made "in jest" and/or are not directed at any particular individual) is also prohibited.

The prohibitions against unlawful discrimination and harassment set forth in this manual apply not only to your conduct relative to other Employees of BSI, but also with respect to the manner by which you interact with others who are not our Employees but with whom you come into contact in the course of your employment with us (for example, the customers whom we serve, representatives of our customers, those who refer customers to us, visitors, suppliers and vendors). In addition, you have a right to respectful and non-discriminatory treatment from customers, prospective customers, visitors to our offices and facilities and others having business with BSI. Consequently, if you feel discriminated against or harassed (sexually or otherwise) by someone who is not a BSI employee, but with whom you must interact as part of your duties and responsibilities, you should immediately report your concerns to the President.

DISABILITIES

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact the President and request such an accommodation. The individual with the disability should discuss what accommodation(s) he or she needs to perform the job. BSI will then engage in a good-faith interactive process with the employee or applicant to determine what, if any, effective accommodation can be made for the employee or applicant, provided the accommodation is reasonable and will not impose an undue hardship on BSI. BSI will comply with the Americans With Disabilities Act.

<p align="center"> CITY OF URBANA HUMAN RELATIONS DIVISION 400 SOUTH VINE ST. URBANA, ILLINOIS 61801 (217) 384-2466 (phone); 384-2426 (fax) terent@urbanaindinois.us </p>	Office Use Only (05/13)	
	Requested by:	Date:
	Approved by:	Date:
	Certification Date:	
	Certificate Expiration Date:	

EQUAL EMPLOYMENT OPPORTUNITY (E.E.O.) WORKFORCE STATISTICS FORM

Please complete the sections below as instructed. Failure to properly complete this form may result in a delay or denial of eligibility to bid or do business with the City of Urbana.

Section I. Identification

I. Company Name and Address:

Name: *Woolard Marketing Consultants, Inc.*

d/b/a:

Address: *106 S. Neil Street*

City/State/Zip: *Champaign, IL 61820*

Telephone Number(s) include area code: *217-359-2459*

Check one of the following

Corporation	<input checked="" type="checkbox"/>	Partnership	<input type="checkbox"/>	Individual Proprietorship	<input type="checkbox"/>	Limited Liability Corp.	<input type="checkbox"/>
FEI Number: <i>30-2991788</i>				Social Security Number:			

2. Name and Address of the Company's Principal Office (answer only if not the same as above)

Name:

Address:

City/State/Zip:

3. Major activity of your company (product or service): *Marketing Consulting*

4. Project on which your company is bidding: *Vallent*

5. City of Urbana contact staff assigned to contract: *Courtney Kuchter*

SECTION II. Policies and Practices

Description of EEO Policies and Practices		YES	NO
A.	Is it the Company's policy to recruit, hire, train, upgrade, promote and discipline persons without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual preference, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
B.	Has someone been assigned to develop procedures, which will assure that the EEO policy is implemented and enforced by managerial, administrative, and supervisory personnel? If so, please indicate the name and title of the official charged with this responsibility. Name: <u>Bonnie S. Wcolard</u> Title: <u>President</u> Telephone: <u>217-359-2459</u> Email: <u>wcolard@mrktshare.com</u>	X	
C.	Does the company have a written Equal Employment Opportunity plan or statement? Note: If no, a copy of an EEO statement is enclosed. You must attach an EEO Statement in order to be considered eligible to do business with the City of Urbana. Questions? (217) 384-2466 or terent@city.urbana.il.us.	X	
D.	Has the company developed a written policy statement prohibiting Sexual Harassment? You must attach a copy of your company's Sexual Harassment Policy in order to be considered eligible to do business with the City of Urbana.	X	
E.	Have all recruitment sources been notified that the company will consider all qualified applicants without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
F.	If advertising is used, does it specify that all qualified applicants will be considered for employment without regard to race, color, creed, class, national origin, religion, sex, age, marital status, mental and/or physical disability, personal appearance, sexual orientation, family responsibilities, matriculation, political affiliation, prior arrest, conviction record, or source of income?	X	
G.	Has the contractor notified all of its sub-contractors of their obligations to comply with the Equal Opportunity requirements either in writing, by inclusion in subcontracts or purchase orders?	X	
H.	Is the company a state certified minority/women owned business? If yes, please attach a copy of state certification.		/
I.	Does the company have collective bargaining agreements with labor organizations?		/
J.	Have the labor organizations been notified of the company's responsibility to comply with the Equal Employment Opportunity requirements in all contracts with the City of Urbana?		/
K.	Does your company perform construction, rehabilitation, alteration, conversion, demolition or repair of buildings, highways or other improvements to real property? (If yes, please complete Table B.)		/
L.	Are you currently seeking to renew an existing or expired Urbana EEO certification? (If yes, you need to complete Table C.)		X

SECTION III. Employment Information

Please complete the company work force analysis on the bottom of this page. Use the number of employees as of the most recent payroll period. You must complete this form in its entirety, as instructed and submit your organization's (1) EEO Statement and (2) Sexual Harassment Policy in order to be eligible to do business with the City of Urbana. For detailed descriptions of the Job Classifications see attached descriptions. If minorities and females are currently underepresented in your workforce, please attach a copy of an explanation of your plan to recruit and hire qualified minorities and females.

TABLE A - TOTAL CONTRACTOR/VENDOR WORKFORCE

Job Categories	Overall Totals		White (Not of Hispanic Origin)		Black or African-American (Not of Hispanic Origin)		Hispanic or Latino		Asian or Pacific Islander		American Indian or Alaskan Native	
			M	F	M	F	M	F	M	F	M	F
	M	F	M	F	M	F	M	F	M	F	M	F
Officials & Mgrs		1		1								
Professionals												
Technicians												
Sales Workers												
Office & Clerical		2		1						1		
Craft Workers (Skilled)												
Operatives (Semi-Skilled)												
Laborers (Unskilled)												
Service Workers												
TOTAL		3		2						1		

M = MALE. Column B is sum of Rows D, F, H, J and L.
 F = FEMALE. Column C is sum of Rows E, G, I, K and M.
 Date of above Data: 12-4-13

TABLE B* - EMPLOYEES TO BE ASSIGNED TO CITY OF URBANA CONTRACT

Job Categories	TOTAL EMPLOYEES		BLACK EMPLOYEES		HISPANIC EMPLOYEES		OTHER MINORITY EMPLOYEES	
	M	F	M	F	M	F	M	F
Officials & Mgrs		1						
Professionals								
Technicians								
Sales Workers								
Office & Clerical		2						1
Craft Workers (Skilled)								
Operatives (Semi-Skilled)								
Laborers (Unskilled)								
Service Workers								
TOTAL		3						1

*Totals included under Table B should be a projection of numbers of persons to be employed in the performance of the City contract.

For Contractors:

Data provided in Table B will be verified by worksite inspections.

TABLE C WORKFORCE TURNOVER SINCE PREVIOUS EEO REPORT**

Job Categories	TOTAL EMPLOYEES SEPARATED		MINORITY EMPLOYEES SEPARATED		TOTAL EMPLOYEES HIRED		MINORITY EMPLOYEES HIRED	
	M	F	M	F	M	F	M	F
Officials & Mgrs								
Professionals								
Technicians								
Sales Workers								
Office & Clerical						1		1
Craft Workers (Skilled)								
Operatives (Semi-Skilled)								
Laborers (Unskilled)								
Service Workers								
TOTAL						1		1

SECTION IV. Certification

By signing below, the company certifies that it has answered all of the foregoing questions truthfully to the best of its knowledge and belief and agrees that it/he/she will comply and abide by the City of Urbana's Code of Ordinances (Section 2-119)

Bonnie S. Woolard
Signature

Bonnie S. Woolard, President 12-3-13
Typed Name and Title Date

SECTION V. Verification

Prior to submitting this form, please check the answers to the following questions to verify your completion of this form:

1. Did you fill in all of the appropriate boxes in the table in Section III, including the "TOTAL" row?

YES X NO _____

2. Have you enclosed your company's EEO statement?

YES X NO _____

3. Have you enclosed your company's Sexual Harassment policy?

YES X NO _____

EQUAL EMPLOYMENT OPPORTUNITY STATEMENT

Woolard Marketing Consultants, Inc.
Company Name

This is to state that it is the policy of Woolard Marketing to act in accordance with all local, state and federal Equal Employment Opportunity guidelines and procedures. This policy is in accordance with the Civil Rights Act of 1964, Equal Employment Act of 1972, and all other applicable laws. Woolard Marketing also strives to assure compliance with the Illinois Fair Employment Practices Act, the Illinois Human Rights Act, City of Urbana Human Rights Ordinance and all other laws pertaining to equal employment opportunity.

Woolard Marketing's Policy includes recruiting, hiring, training, upgrading, promoting, and disciplining without regard to any of the protected classes found in local, state or federal E.E.O laws. Woolard Marketing has developed procedures to assure this policy is understood and carried out by managerial, administrative, and supervisory personnel.

ASSIGNMENT OF RESPONSIBILITY: Woolard Marketing has undertaken a positive E.E.O Program to effectively implement and enforce this policy at all times. The E.E.O officer or person designated for monitoring the company's E.E.O. Program is: Bonnie J. Woolard

PROCEDURES FOR DISSEMINATION OF POLICY: A copy of this statement is posted in the main office at Woolard Marketing and copies of the policy are available to employees, vendors and/or subcontractors.

UTILIZATION ANALYSIS: Woolard Marketing will monitor its workforce and job classifications. It will analyze availability and under-utilization and respond accordingly. Woolard Marketing will attempt to advertise job vacancies in places where minorities and females may more likely become aware of the job openings.

GOALS AND TIMETABLES: Woolard Marketing will identify those areas within its workforce in which minorities and women are being under-utilized and set up a system of goals and timetables for correcting the deficiencies.

SYSTEM FOR MONITORING COMPLIANCE AND RECRUITMENT OF WORKFORCE: When adding new employees Woolard Marketing's policy is to assure there are minorities and females in the applicant pool. Woolard Marketing supports EEO programs.

SYSTEM OF RECORDS AND ANNUAL SUMMARY: Woolard Marketing will monitor applicant data, employee records and job descriptions to assist in its Equal Employment efforts.

Bonnie J. Woolard
Signature

12-4-13
Date

POLICY REGARDING SEXUAL HARASSMENT IN EMPLOYMENT

Woodard Marketing Consultants, Inc.
FULL COMPANY NAME

I. STATEMENT OF COMPANY POLICY

This company is committed to providing a workplace that is free from all forms of discrimination, including sexual harassment. Any employee's behavior that fits the definition of sexual harassment is a form of misconduct which may result in disciplinary action up to and including dismissal. Sexual harassment could also subject this company and, in some cases, an individual to substantial civil penalties.

The company's policy on sexual harassment is part of its overall affirmative action efforts pursuant to state and federal laws prohibiting discrimination based on age, race, color, religion, national origin, citizenship status, unfavorable discharge from the military, marital status, disability, and gender. Specifically, sexual harassment is prohibited by the Civil Rights Act of 1964, as amended in 1991, the Illinois Human Rights Act and the Urbana Human Rights Ordinance.

Each employee of this company bears the responsibility to refrain from sexual harassment in the workplace. No employee, male or female, should be subjected to unsolicited or unwelcome sexual overtures or conduct in the workplace. Furthermore, it is the responsibility of all supervisors to make sure that the work environment is free from sexual harassment. All forms of discrimination and conduct which can be considered harassing, coercive or disruptive, or which create a hostile or offensive environment must be eliminated. Instances of sexual harassment must be investigated in a prompt and effective manner.

All employees of this company, particularly those in a supervisory or management capacity, are expected to become familiar with the contents of this Policy and to abide by the requirements it establishes.

II. DEFINITION OF SEXUAL HARASSMENT

According to the Illinois Human Rights Act, sexual harassment is defined as: Any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature when;

- (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment.
- (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
- (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

The courts have determined that sexual harassment is a form of discrimination under Title VII of the Civil Rights Act of 1964, as amended in 1991.

Conduct commonly considered to be sexual harassment includes:

* Verbal: sexual innuendos, suggestive comments, insults, humor and jokes about sex, anatomy or gender-specific traits, sexual propositions, threats, repeated requests for dates, or statements about other employees, even outside their presence, of a sexual nature.

* Non-verbal: Suggestive or insulting sounds (whistling), leering, obscene gestures, sexually suggestive bodily gestures, "catcalls", "smacking", or "kissing" noises

* Visual: posters, signs, pin-ups or slogans of a sexual nature.

* Physical: Touching, unwelcome hugging or kissing, pinching, brushing the body, coerced sexual intercourse, or actual assault.

Sexual harassment most frequently involves a man harassing a woman. However, it can also involve a woman harassing a man or harassment between members of the same gender.

III. RESPONSIBILITY OF INDIVIDUAL EMPLOYEES.

Each individual employee has the responsibility to refrain from sexual harassment in the workplace.

An individual employee who sexually harasses a fellow worker is, of course, liable for his or her individual conduct.

The harassing employee will be subject to disciplinary action up to and including discharge in accord with the company's disciplinary policy and the terms of any applicable collective bargaining agreement.

The company has designated Bonnie J. Woolard (Name), President (Title) to coordinate the company's sexual harassment policy compliance. Mr./Ms. Woolard can be reached at 217-354-2459 (Address and Telephone).

[NOTE: Insert the name of the company's EEO Officer, Human Resource Administrator, Personnel Officer, or other person designated by company management to coordinate compliance with this policy] He/She is available to consult with employees regarding their obligations under this policy.

IV. RESPONSIBILITY OF SUPERVISORY EMPLOYEES.

Each supervisor is responsible for maintaining the workplace free from sexual harassment. This is accomplished by promoting a professional environment and by dealing with sexual harassment as with all other forms of employee misconduct.

A supervisor must address an observed incident of sexual harassment or a complaint, with seriousness, take prompt action to investigate it, report it, and end it, implement appropriate disciplinary action, and observe strict confidentiality. This also applies to cases where an employee tells the supervisor about behavior that constitutes sexual harassment but does not want to make a formal complaint.

In addition, supervisors must ensure that no **retaliation will result against an employee making a sexual harassment complaint.**

Supervisors in need of information regarding their obligations under this policy or procedures to follow upon receipt of a complaint of sexual harassment should contact Bonnie's Norland (Name), President (Title) at 217-359-2459 (Address and telephone). [NOTE: Insert name of company EEO Officer, Human Resource Administrator, Personnel Officer, or other person designated by company management]

V. PROCEDURES FOR FILING A COMPLAINT OF SEXUAL HARASSMENT

A. INTERNAL

An employee who either observes or believes herself/himself to be the object of sexual harassment should deal with the incident(s) as directly and firmly as possible by clearly communicating her/his position to the supervisor, EEO Officer*, and to the offending employee. It is not necessary for the sexual harassment to be directed at the person making the complaint.

Each incident of sexual harassment should be documented or recorded. A note should be made of the date, time, place, what was said or done, and by whom. The documentation may be augmented by written records such as letters, notes, memos, and telephone messages.

No one making a complaint of sexual harassment will be retaliated against even if a complaint made in good faith is not substantiated. Any witness to an incident of sexual harassment is also protected from retaliation.

The process for making a complaint about sexual harassment falls into several stages.

1. **DIRECT COMMUNICATION.** If there is sexually harassing behavior in the workplace, the harassed employee should directly and clearly express her/his objection that the conduct is unwelcome and request that the offending behavior stop. The initial message may be verbal. If subsequent messages are needed, they should be put in writing in a note or a memo.

2. **CONTACT SUPERVISORY PERSONNEL.** At the same time direct communication is undertaken, or in the event the employee feels threatened or intimidated by the situation, the problem must be promptly reported to the immediate supervisor or the EEO Officer. If the harasser is the immediate supervisor, the problem should be reported to the next level of supervision of the EEO Officer.

3. FORMAL WRITTEN COMPLAINT. An employee may also report incidents of sexual harassment directly to the EEO Officer. The EEO Officer will counsel the reporting employee and be available to assist with filing a formal complaint. The Company will fully investigate the complaint, and will advise the complainant and the alleged harasser of the results of the investigation.

B. EXTERNAL

The Company hopes that any incident of sexual harassment can be resolved through the internal process outlined above. All employees, however, have the right to file formal charges with the Illinois Department of Human Rights (IDHR), the United States Equal Employment Opportunity Commission (EEOC) and/or the Urbana Human Relations Commission (UHRC). A charge with IDHR must be filed within 180 days of the incident of sexual harassment. A charge with EEOC must be filed within 300 days of the incident. A charge with UHRC must be filed within 90 days of the incident.

Bonnie D. Woodard, President, 12-4-13

Name, Title and Date

Authorized Company Official

MONTHLY COMPLAINT ACTIVITY REPORT

<u>CASE #</u>	<u>DATE FILED</u>	<u>RESPONSE RECEIVED</u>	<u>DATE</u>	<u>DAYS FROM RESPONSE</u>	<u>DISCRIMINATION TYPE</u>	<u>ALLEGATION TYPE</u>	<u>STATUS/DISPOSITION</u>
UC1106-03	6/15/2011	8/30/2011	11/12/13	805	RACE, SEX, AGE, RETALIATION	EMPLOYMENT	SCHEDULING MEDIATION
UC1303-02	3/1/2013	4/30/2013	11/12/13	196	PRIOR CONVICTION	EMPLOYMENT	SETTLED - COMPLAINANT RECEIVED FULL BACK WAGES
UC1301-01	3/27/2013	4/29/2013	11/12/13	197	RACE	EMPLOYMENT	PREPARING 2ND REQUEST FOR INFORMAITON
UC1303-03	3/15/2013	4/30/2013	11/12/13	196	RETALIATION (UC1106-03)	EMPLOYMENT	SCHEDULING MEDIATION
UC1304-06	4/26/2013	6/14/2013	11/12/13	151	SEXUAL ORIENTATION, GENDER	EMPLOYMENT	FACT-FINDING MEETING RESCHEDULED
UC1307-09	7/17/2013	8/31/2013	11/12/2013	73	RACE	EMPLOYMENT	SCHEDULING FACT-FINDING MEETING
UC1310-10	10/31/2013	NA	11/12/2013	#VALUE!	PRIOR CONVICTION	EMPLOYMENT	AWAITING INITIAL RESPONSE
UC1311-11	11/52013	NA	11/12/2013	#VALUE!	SOURCE OF INCOME (SEC 8)	HOUSING	ISSUE RESOLVED

MONTHLY COMPLAINT ACTIVITY REPORT.xlsx

TYPE OF DISCRIMINATION ALLEGED	PROTECTED CLASS BASIS	DISPOSITION	DATE
EMPLOYMENT	RACE	COMPLAINANT WITHDREW	Oct-11
EMPLOYMENT	RACE	COMPLAINT FILED	Nov-11
EMPLOYMENT	RACE	COMPLAINT FILED	Nov-11
EMPLOYMENT	RACE	NO JURISDICTION	Nov-11
EMPLOYMENT	RACE	COMPLAINT FILED	Dec-11
EMPLOYMENT	CRIMINAL BACKGROUND	COMPLAINT FILED	Dec-11
EMPLOYMENT	RACE	COMPLAINT DID NOT SHOW TO 1ST MEETING	Dec-11
EMPLOYMENT	RACE	COMPLAINT FILED	Jan-12
EMPLOYMENT	RACE	REFERRED TO CHAMPAIGN	Jan-12
EMPLOYMENT	RACE	REFERRED TO CHAMPAIGN	Feb-12
HOUSING	NATIONAL ORIGIN/RELIGION	RESOLVED	Mar-12
EMPLOYMENT	RETALIATION	INTAKE MEETING SCHEDULED	Mar-12
EMPLOYMENT	NO BASIS	NO JURISDICTION	Mar-12
EMPLOYMENT	RACE	IDHR CASE	Apr-12
EMPLOYMENT	MILITARY STATUS	WAITING FOR CONTACT FROM COMPLAINANT	Apr-12
EMPLOYMENT	NATIONAL ORIGIN	REFERRED TO IDHR	Nov-12
EMPLOYMENT	NO BASIS	NO JURISDICTION	Nov-12
EMPLOYMENT	RACE	COMPLAINT TO BE FILED	Nov-12
EMPLOYMENT	RACE/GENDER	COMPLAINANT DID NOT SHOW TO 1ST MEETING	Nov-12
EMPLOYMENT	NATIONAL ORIGIN, GENDER, ETC	COMPLAINT FILED	Dec-12
EMPLOYMENT	RELIGION	COMPLAINT FILED	Dec-12
EMPLOYMENT	GENDER, RETALIATION	COMPLAINT FILED	Dec-12
EMPLOYMENT	RACE	REFERRED TO UNEMPLOYMENT OFFICE	Jan-13
EMPLOYMENT	RACE	WAITING FOR DECISION FROM COMPLAINANT	Jan-13
EMPLOYMENT	RACE	NO SHOW	Feb-13
EMPLOYMENT	AGE	IDHR CASE	Feb-13
HOUSING	NO BASIS	NO JURISDICTION	Feb-13
EMPLOYMENT	SEXUAL HARASSMENT	COMPLAINT BEING DRAFTED	Mar-13
EMPLOYMENT	PHYSICAL DISABILITY/RETALIATION	COMPLAINT BEING DRAFTED	Mar-13
EMPLOYMENT	PRIOR CONVICTION	COMPLAINT FILED	Mar-13
EMPLOYMENT	RETALIATION	COMPLAINT FILED	Mar-13
EMPLOYMENT	GENDER	REFERRED TO CHAMPAIGN	Apr-13
EMPLOYMENT	SEXUAL HARASSMENT/RETALIATION	COMPLAINT FILED	Apr-13
EMPLOYMENT	SEXUAL ORIENTATION	COMPLAINT FILED	Apr-13
HOUSING/EMPLOYMENT	NATIONAL ORIGIN	COMPLAINT DID NOT SHOW TO COMPLAINT SIGNING	May-13
EMPLOYMENT	GENDER	NO JURISDICTION; REFERRED TO CHAMPAIGN	May-13
HOUSING	NO BASIS	NO JURISDICTION; REFERRED TO TENANTS UNION	Jun-13
EMPLOYMENT	RACE	NO JURISDICTION; REFERRED TO IDHR	Jun-13
EMPLOYMENT	UNKNOWN	WAITING FOR CONTACT FROM COMPLAINANT	May-13
HOUSING	NO BASIS	NO JURISDICTION	Jun-13
EMPLOYMENT	RACE/ETHNICITY	WAITING FOR CONTACT FROM COMPLAINANT	Jun-13
EMPLOYMENT	RACE	REFERRED TO CHAMPAIGN/IDHR	Jul-13
EMPLOYMENT	RACE	NO JURISDICTION	Jul-13
HOUSING	RACE/ETHNICITY/CREDIT	ISSUE RESOLVED	Aug-13
HOUSING	RACE/ETHNICITY/CREDIT	ISSUE RESOLVED	Aug-13
EMPLOYMENT	RACE	REFERRED TO IDHR	Aug-13
EMPLOYMENT	RACE	REFERRED TO IDHR	Sep-13
EMPLOYMENT	SEXUAL HARASSMENT	SCHEDULED INITIAL MEETING	Oct-13
HOUSING	SECTION 8	ISSUE RESOLVED	Nov-13
HOUSING	NATIONAL ORIGIN	WAITING FOR CONTACT FROM COMPLAINANT	Nov-13
EMPLOYMENT	SEXUAL HARASSMENT	NO JURISDICTION REFERRED TO IDHR	Nov-13
HOUSING	SECTION 8	NO INJURY	Dec-13
EMPLOYMENT	RACE	WAITING FOR DECISION FROM COMPLAINANT	Dec-13

Human Relations Commission Budget
FY 2013-2014

Line Item	Date	Description	Debit	Credit	Balance
020-3-1200-2012 (Books - Commission Budget)	7/1/2013	Beginning Balance			200
020-3-1200-2016 (HR Meeting Expenses)	7/1/2013	Beginning Balance			150
020-3-1300-3027 (Training - Commission Budget)	7/1/2013	Beginning Balance			1500
020-3-1300-3060 (HR Hearing Officer/Legal)	7/1/2013	Beginning Balance			9500
	10/11/2013	Donald R. Jackson	170.67		9329.33
020-3-1300-3062 (Traffic Stop Stat. Study)	7/1/2013	Beginning Balance			500
020-3-1300-3102 (Grants/Sponsorships - Commission)	7/1/2013	Beginning Balance			1500
020-3-1300-3120 (Community Education - Commission)	7/1/2013	Beginning Balance			1500
020-3-1300-3422 (Printing - Commission Budget)	7/1/2013	Beginning Balance			400