

**BOARD OF COUNTY COMMISSIONERS
SARPY COUNTY, NEBRASKA**

RESOLUTION ADOPTING AN UPDATED EQUAL EMPLOYMENT OPPORTUNITY PLAN

WHEREAS, pursuant to Neb. Rev. Stat. § 23-104(6) (Reissue 2012), the County has the power to do all acts in relation to the concerns of the County necessary to the exercise of its corporate powers;

WHEREAS, pursuant to Neb. Rev. Stat. § 23-103 (Reissue 2012), the powers of the County as a body are exercised by the County Board;

WHEREAS, per federal regulations, certain grant award recipients are required to certify they have an Equal Employment Opportunity Plan ("EEOP") and that the EEOP has been formulated and signed into effect within the past two years;

WHEREAS, Sarpy County does have an EEOP but it has not been re-formulated and signed into effect within the last two years;

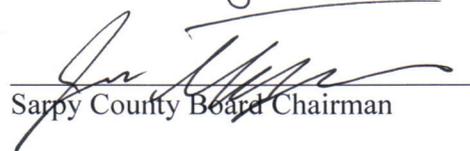
WHEREAS, an updated EEOP is attached, however that EEOP does not yet include an analysis of whether minorities, women, or other protected groups are underutilized in the County's workforce. This information will be gathered and presented to the Board at a later date; and

WHEREAS, adopting the EEOP is in the best interests of the citizens of Sarpy County.

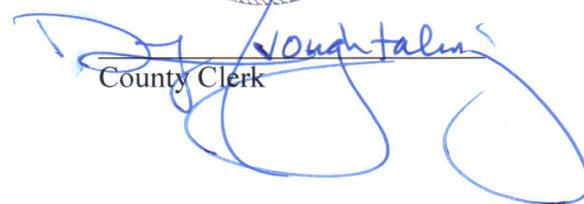
NOW, THEREFORE, BE IT RESOLVED by the Sarpy County Board of Commissioners that this Board does hereby adopts the attached Equal Employment Opportunity Plan.

BE IT FURTHER RESOLVED that all previous resolutions or parts of resolutions of the Sarpy County Board of Commissioners on said subjects or in conflict with the provisions of this Resolution are hereby repealed.

The above Resolution was approved by a vote of the Sarpy County Board of Commissioners at a public meeting duly held in accordance with the applicable law on the 28th day of January, 2014.


Sarpy County Board Chairman

Attest
SEAL



County Clerk



Equal Employment Opportunity Plan Sarpy County

February 1, 2014

PREFACE:

This Equal Employment Opportunity (EEO) Plan is in effect as of February 1, 2014.

Sarpy County does not require employees to disclose their ethnicity. The utilization numbers that will be reported in this EEO Plan reflect the ethnic backgrounds that have been voluntarily disclosed by the workforce of Sarpy County.

INTRODUCTION:

Sarpy County has a total area of 247 square miles, of which 241 square miles is land and 7 square miles is water. As of 2010 Census, the population was 158,840, making it the third most populous County in Nebraska.

The County is divided into five electoral districts, and the five-member "Board of County Commissioners" oversees the County's government. Sarpy County employs nearly 630 personnel. The Sarpy County Human Resources Department is located at 1261 Golden Gate Drive, Suite 4E, Papillion, NE 68046; phone (402) 593-4485.

GRANT INFORMATION:

Sarpy County is a recipient agency under the following criteria:

- Receives a total of \$25,000 or more in grants/sub-grants

Sarpy County receives grant revenue from the sources identified in the attached Schedule of Expenditures of Federal Awards. The most current Schedule shall be available upon request.

CONTACT INFORMATION:

Deb Houghtaling, Sarpy County Clerk
Phone: 402-593-4155
Email: clerk@sarpy.com
1210 Golden Gate Drive #1250
Papillion, Nebraska 68046-2894

PLAN TERMINOLOGY

Accommodation: The employer's obligation to make reasonable changes in the work environment or reasonable modification in work assignments and scheduling to provide "qualified individuals" employment opportunities through appropriate assistive devices and work modification.

Adverse Impact: A statistical measure (such as those outlined in the EEO Commission's Uniform Guidelines on Employee Selection Procedures) that is applied to the effects of a selection procedure and demonstrates a disproportionate negative impact on any group defined in terms of ethnic group identification, sex, or disability. A disparity identified in a given selection process will not be considered to constitute adverse impact if the numbers involved are too small to permit a meaningful comparison.

Basis: Cause of discrimination alleged in discrimination complaint based on a person's race, color, national origin, sex, religion, disability, marital status, or retaliation for a person's opposition to an act made unlawful by the Civil Rights Act of 1964 or similar civil rights laws.

Business Necessity: Circumstances which justify an exception to the requirements of Americans with Disabilities Act (ADA) because compliance would result in substantial additional financial cost or pose a significant threat to human life or safety. Business necessity requires greater financial cost than mere business convenience. Business necessity does not exist where there is an alternative that will serve business needs equally well.

County: Sarpy County five-member Board of County Commissioners.

Complainant (Charging Party): A person filing a complaint of discrimination, discriminatory or sexual harassment alleging a violation of federal or state civil rights (equal opportunity and nondiscrimination) laws, regulations, or the County's EEO-related policies.

Discrimination: The showing that a practice, procedure, or test has an adverse effect on at least one protected group and is not job-related. With regard to employment practices, the denial or equal treatment to a person in comparison with other, similarly situated, based on that person's rights as defined under by Title VII; the Age Discrimination Employment Act; American with Disabilities Act; any amendments as well as other federal or state anti-discrimination laws.

EEO Commission Classifications of Ethnic Groups: This document uses the Equal Employment Opportunity Commission (EEOC) classifications of ethnic groups which are defined below:

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

Black (Not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa, as well as Jamaican, Trinidadian, and West Indian.

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

Asian or Pacific Islander: All persons having origins in 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.

Employment Practices: Means activities and decisions associated with job advertisements, recruiting, application and hiring, job referrals, job assignments and promotions, pay and benefits, discipline and discharge, employment references, reasonable accommodation and disability, reasonable accommodation and religion, training and apprenticeship programs, harassment, terms and conditions of employment, pre-employment inquiries (general), and dress code.

Equal Employment Opportunity: Means that all qualified individuals have a full and fair opportunity to compete for hiring and promotion and to enjoy the benefits of employment. Equal employment opportunity should exist at all levels and in all job categories. Ensuring equal employment opportunity also involves creating an environment that fosters cooperation, acceptance, democracy, and free expression of ideas and that is welcoming to men and women, persons of color, persons with disabilities, and individuals from all other protected groups.

Equal Employment Opportunity Plan: A written document in which the County's workforce is analyzed and specific plans, goals, and objectives are set forth for ensuring equal employment opportunity.

Equal Employment Opportunity Programs: All the various methods by which equal employment opportunity is ensured. Such methods include, but are not limited to, using nondiscriminatory employment practices, such as actively recruiting, monitoring, and taking additional steps consistent with the requirements of federal and state equal employment opportunity laws and regulations.

Formal Complaint: Any complaint alleging discrimination or illegal harassment filed with the Human Resource (HR) Director or the Civil Division of the County Attorney's office.

Informal Complaint: Any verbal or written statement alleging discrimination filed by a complainant with a supervisory-level employee.

Issues: The violations alleged in the complaint or the nature of the charge of discrimination, such as failure to hire, discharge, failure to promote, layoff, harassment, or other terms and conditions of an individual's employment.

Person of Disability: Any person who (a) has a physical or mental impairment which substantially limits one or more major life activities, (b) has a record of such impairment, or (c) is regarded as having such impairment.

Protected Class: Legally identifies groups that are specifically protected by statute against employment discrimination, such as minority group members, females, elderly, disabled, and veteran status by virtue of the law or court decisions interpreting the law.

Reasonable Accommodation: The efforts made on the part of the County to remove artificial or real barriers, which prevent or limit the employment and upward mobility of persons with disabilities.

Relevant Labor Market: That portion of the labor force within the County's recruitment area (i.e. Omaha-Council Bluffs Metropolitan Statistical Area) possessing the requisite skills.

Retaliation: Prohibited action taken against complainants or person assisting in a complaint of discrimination or illegal harassment as a direct result of their participation in the complaint or their opposition to alleged unlawful employment practices prohibited by state and federal laws and Board policies.

Screening or Selection Procedures: Any measure, combination of measures, or procedures used as a basis for any employment decisions. Selection procedures include the full range of assessment techniques including, but not limited to, traditional paper and pencil tests or assessments, performance/skill-based tests, physical ability, educational and work experience requirements, interviews, as well as the review of application forms.

Significantly Underrepresented Group: Any monitored group for which the percentage of persons from that group employed by the County in any job category is below eighty percent (80%) of the projected representation for that group in the job category in question.

Underutilization: This exists when fewer protected group members are in a particular job category than would reasonably be expected by their presence in the relevant labor market.

Utilization: The actual number and percentage of men, women, and ethnic groups employed by an organization, in each department or in each job category.

REAFFIRMATION OF POLICY

In adopting this Equal Opportunity Employment Plan, the Board of County Commissioners of Sarpy County reaffirms its commitment to the principles of equal opportunity in employment and all other personnel practices. The County realizes the success of this program is dependent upon the contribution that each and every County employee must make to ensure the philosophy of the program is practiced and the requirements, goals, and objectives are met. This program is dedicated to the principle that through good faith effort, Sarpy County will endeavor to be a leader in the community as an Equal Opportunity Employer.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Sarpy County is committed to providing an inclusive and welcoming environment for all members of its community and to ensuring that employment decisions are based on individuals' abilities and qualifications. It is, therefore, the policy of Sarpy County, pursuant to its legal and social obligations, to undertake, maintain, and support a program of positive action to assure that equal employment opportunities are made available to all qualified and qualifiable employees and applicants without regard to race, color, national origin, sex, age, religion, disability, genetic information, marital status, veteran's status, or political affiliation. Such a policy ensures that only relevant factors are considered and that equitable and consistent standards of conduct and performance are applied.

Employees and applicants shall be assured fair and equal treatment in all aspects of recruitment, selection and hiring, training, compensation, benefits, promotion, transfers, layoffs, recalls from layoffs, demotions, suspensions, terminations, working conditions, educational and training opportunities, and all other job-related personnel policies and practices are free from discrimination or illegal harassment.

DESIGNATION OF RESPONSIBILITY

Board of Commissioners - ultimate responsibility for compliance with the Equal Employment Opportunity (EEO) Policy and other EEO-related policies as well as the success of the Sarpy County EEO Plan through:

- Encouragement and budgetary assistance to County departments;
- Dissemination of EEO oriented information to employees and the general public; and
- Requesting and reviewing EEO progress reports.

County Administrator - ultimate responsibility for EEO compliance for all employees under direct or indirect supervision through:

- Effective communication of the requirements of all EEO-related policies;
- Cooperation of all department heads and their supervisors and employees in the achievement of the Equal Employment Opportunity Plan; and
- Assurance that each department head takes action, as is necessary to achieve the Plan's goals and objectives.

Human Resource (HR) Director - responsible for overall coordination of EEO activities as outlined below:

- Prepare EEO Plan and make presentations to County management and employees;
- Gather EEO data relative to employees/applicants by race, gender, classification, pay grade, age, disabilities, and other legally required information;
- Maintain EEO data, documents, and other-related records;
- Ensure current and new employees receive the County's EEO Policy, other EEO-related policies, and the Complaint Procedures;
- Provide training to Elected Officials, Department Heads, and other management-level personnel on the requirements of the EEO-related policies;
- Investigate alleged discrimination and illegal harassment complaints;
- Work to resolve internal and external complaints of alleged discrimination or illegal harassment;
- Ensure that all personnel actions are free from discriminatory practices and disparate impact;
- Update the EEO Plan every two years; and
- Assist with the preparation of the EEO-4 report, data base information, and other related information.

Elected Official / Department Head – ensure EEO compliance by implementing, maintaining, and monitoring affirmative efforts within their office and/or department to include:

- Provide necessary employee data to the Human Resources (HR) Director in order to achieve compliance with the EEO Plan and EEO-related policies;
- Certify their staff are in compliance with EEO Policies, other EEO-related policies as well as applicable laws, rules, regulations, and procedures;
- Accept responsibility for effectuating progress towards the EEO Plan objectives;
- Ensure all managers/supervisors understand the County's EEO-related policies and EEO Plan and the necessity of their support;
- Certify that appropriate steps are implemented throughout their respective offices/departments that are consistent and supportive of the EEO Plan;
- Discuss with managers/supervisors the importance of, and the progress being made, in achieving the County's EEO Plan's objectives;
- Hold supervisory staff and employees accountable for promoting EEO in the work place;
- Certify that staff under their supervision attend scheduled EEO training; and
- Ensure the appropriate EEO materials are displayed in the respective workplaces for all employees to view.

Managers (executive and mid-level) / Supervisors - adhere to EEO-related policies as well as the intent of the County's EEO Plan:

- Demonstrate commitment and support of EEO Policy and other EEO-related policies;
- Ensure that the principles covered in the EEO Policy are upheld by employees for whom they are responsible;
- Initiate steps to foster and maintain a work climate that is conducive to achieving equal employment opportunities, employee job satisfaction, and fair treatment as well as a workplace free from discrimination or illegal harassment;
- Assure that personnel-related decisions are made non-discriminatorily;
- Ensure equality of employment opportunity is extended to all employees;
- Conduct periodic performance reviews which will document the employee's development and readiness to assume higher level positions when promotional opportunities become available;
- Perform audits periodically to ensure compliance in areas such as:
 - Proper display of posters and communiqués;
 - Minority and female employees are afforded full opportunity and are encouraged to participate in all County-sponsored education, program, recreation, and social activities; and
 - Participate in the periodic review of all job descriptions to ensure accurate reflection of duties performed; and
- Actively encourage employees to increase their skills and job advancement potential through training and educational opportunities;
- Post EEO-related policies and federal and state notices of Equal Employee Opportunity throughout the workplace; and

- Report any employment discrimination or harassment complaint to the HR Director.

Employees:

- Understand and abide by the County's EEO Policy and other EEO-related policies as well as comply with the policies terms;
- Support a work climate that is conducive to achieving equal employment opportunities and a workplace free from discrimination or harassment;
- Report to their immediate manager or supervisor conduct which is prohibited by the EEO Policy or other EEO-related policies, whether or not the individual is personally involved;
- Cooperate complete in any investigation of violations of policy.

DISCRIMINATORY HARASSMENT POLICY

It is the policy of the Sarpy County Board of Commissioners to maintain a work environment that respects the dignity and worth of each individual, and permits employees to feel free from intimidation, coercion, unlawful harassment, or retaliation. Any form of unlawful discrimination against an individual on the basis of race, color, sex, national origin, religion, age, disability, pregnancy, veteran status, marital status or any other characteristic protected by applicable law is a form of employee misconduct which undermines the integrity of employment relationship and shall not be condoned.

Discriminatory harassment including, but not limited to, racial harassment; sexual harassment; and/or harassment based on national origin, religion, age, disability, pregnancy, veteran status or marital status infringes on an individual's right to a work environment that is free from intimidating or offensive behavior and will not be tolerated.

DEFINITION:

Discriminatory Harassment/Other Prohibited Harassment is defined as unwelcome (verbal or physical) conduct relating to an individual's race, color, national origin, sex, age, disability, religious or political affiliation, veteran status, marital status or other characteristics protected by law that has the purpose or effect of unreasonably interfering with or creating an offensive or hostile work environment is prohibited.

It is impossible to identify all of the conduct that could constitute other prohibited harassment. The following are examples of conduct that may constitute such harassment:

- Using epithets, slurs, inappropriate jokes or pranks;
- Frequent derogatory remarks, comments, or innuendos;
- Obscene or harassing phone calls, emails, letters, notes, or other forms of communication;
- Mocking, ridiculing, or mimicking another's culture, accent, appearance, or customs;
- Threatening, intimidating, or engaging in hostile or offensive acts that focus on an individual's race, color, national origin, sex, age, religious or political affiliation, disability, veteran status, marital status, or any other protected class as defined by law;
- Posting offensive material on walls, bulletin boards, or elsewhere on County property;
- Circulating offensive material in the workplace in writing, by electronic means, or other methods.

Discriminatory harassment is not acceptable and will not be tolerated. All employees are expected to comply with this Policy demonstrating sensitivity and respect for others.

SEXUAL HARASSMENT POLICY

Sexual Harassment is a form of unlawful harassment. All persons must be provided an environment free from unsolicited and unwelcome sexual overtures. Sexual harassment debilitates morale and interferes with the productivity of its victims and coworkers.

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment where:

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 the individual is used as the basis for employment decisions,
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment, or
4. Such conduct has the purpose or effect of unreasonably interfering with, or creating an offensive or hostile environment for a non-employed individual.

There are two types of sexual harassment:

1. *Quid Pro Quo* or "this for that" is behavior involves express or implied demands for sexual favors in exchange for some benefit such as a promotion, raise, recommendation, or to avoid some detriment in the workplace such as termination, demotion, etc. *Quid Pro Quo* harassment may be as undisguised as a direct solicitation ("sleep with me or else...") or it may take the form of more oblique sexual propositions or dating invitations.
2. *Hostile Work Environment* is unwelcome, severe, and pervasive harassment sufficient to alter the condition of employment and create an abusive environment in which to work. This definition goes beyond casual, infrequent, or isolated instances. The person alleging a hostile work environment must show a pattern or practice of harassment against oneself, as a single or isolated incident will generally not be sufficient. In determining whether a reasonable person in an individual's circumstances would find the work environment to be hostile, the totality of the circumstances must be considered.

Examples of conduct that may rise to the level of sexual harassment may include, but are not limited to, the following:

Verbal Sexual Harassment

- Making explicit propositions that are unwelcomed;
- Making sexual comments about a person's clothing, body, or appearance (looks),
- Asking personal questions regarding an employee's social or sex life;
- Telling dirty jokes, having conversations with sexual overtones, or turning casual comments into sexual innuendoes; or
- Making obscene phone calls;

Non-Verbal Sexual Harassment

- Leering, looking someone up and down, making facial expressions such as winking or licking lips;
- Distributing, posting, or displaying pin-up calendars, or sexually explicit pictures, cartoons, or objects, with or without sexually explicit wording or comments;
- Making sexual gestures, sounds, or stares;
- Sending/giving gifts or any materials of a sexual nature; or
- Sending obscene or sexually explicit emails, letters, notes, or other forms of written communication.

Physical Sexual Harassment

- Deliberately brushing up against a person;
- Massaging, hugging, kissing, patting, fondling, groping, or pinching any area of a person's body; or
- Committing or attempting to commit a rape, sexual assault, battery, or molestation.

ADDITIONAL INFORMATION:

1. A man, as well as, a woman may be the victim of sexual harassment, and a woman, as well as, a man may be the harasser.
2. The harasser does not have to be the victim's supervisor. The harasser may also be an agent of the County, a supervisor who does not supervise the victim, a non-supervisory employee, coworker, subordinate, or, in some circumstances, even a non-employee.
3. The harassed does not have to be a County employee; they may be a client/customer, or agent of the County or a person providing unpaid/volunteer service to the County.
4. The act at issue determines sexual harassment and not the gender of the parties involved.
5. The victim does not have to be the person to whom the unwelcome sexual conduct is directed. It may be someone who is affected by such conduct when it is directed toward another person. For example, the sexual harassment of one female (or male) employee may create an intimidating, hostile, or offensive working environment for another female (or male).

Any incident involving sexual harassment of an employee on or in the workplace by a non-employee such as a vendor, client, member of the general public, etc. will not be tolerated and should be reported immediately.

AMERICANS WITH DISABILITIES ACT (ADA) POLICY

Sarpy County is committed to equality of opportunity and freedom from discrimination for all employees, applicants for employment, and customers regardless of any disability an individual may have. In accordance with the Americans with Disabilities Act of 1990 and the Section 504 of the Rehabilitation Act of 1973, Sarpy County has taken positive steps to make Sarpy County facilities accessible to individuals with disabilities and has established procedures to provide reasonable accommodations to allow individuals with disabilities to maintain employment with Sarpy County or gain access to Sarpy County services.

POLICY APPLICATION:

The Human Resources (HR) Director has been appointed as the ADA Coordinator for Sarpy County. As such, the HR Director shall periodically review the County's employment procedures to assure that job qualifications are based upon the essential functions of the job and will be responsible for investigating any complaints from employees and/or individuals of the general public.

The physical and mental qualifications as defined in the County's job description shall describe the necessary requirements to perform the job consistent with both business necessity and the safety of the job incumbent, other County employees, and the general public. When job requirements have the effect of screening out otherwise qualified individuals with disabilities as defined by the Americans with Disabilities Act (ADA) in the selection of applicants for employment or employees for changes in employment status, such as promotion or training, the County shall ensure that the requirements are related to the essential functions of the specific job(s) for which the individual is being considered.

Information obtained from an applicant/employee concerning a disability as defined by the ADA shall be kept confidential, except that:

1. Supervisors and managers may be informed regarding possible accommodations to be made or restrictions on work or duties;
2. An employee's supervisor(s) may be informed when and to what extent, if appropriate, any condition might require emergency treatment, and
3. Government agencies/officials investigating compliance with the equal employment opportunity laws and regulations will be provided documentation that is focused and tailored to produce information relevant to an investigation.

REASONABLE ACCOMMODATION:

The County shall make reasonable accommodations for employees or applicants, with disabilities as defined by the ADA, to the extent that such accommodation does not impose an undue hardship on the conduct of County business.

Reasonable accommodation shall be defined as any adjustment to a job or work environment that permits an applicant or employee with a disability, as defined by the ADA, to participate in the job application process, to perform the essential functions of a job, or to enjoy benefits and privileges of employment equal to those enjoyed by employees without disabilities.

Reasonable accommodation may include, but is not limited to:

- Acquiring or modifying equipment or devices;
- Job restructuring;
- Part-time or modified work schedules;
- Reassignment to a vacant position;
- Adjusting or modifying examinations, training materials or policies;
- Providing readers and interpreters; and
- Making the workplace readily accessible to and usable by people with disabilities.

When an employee or applicant requests accommodation, the County shall undertake an interactive process with the individual to clarify what the individual needs and identify the appropriate reasonable accommodation should one or more exist.

The County may ask the individual for reasonable documentation from an appropriate healthcare or rehabilitation professional to establish that a person has a disability covered by the ADA, and that the disability necessitates a reasonable accommodation. An individual will not be asked for documentation when both the disability and the need for reasonable accommodation are obvious or the individual has already provided the County with sufficient information to substantiate that the individual has a qualifying disability as defined by the ADA.

The County may choose among reasonable accommodations as long as the chosen accommodation is effective. The County is not obligated to show that it is an undue hardship to provide the more difficult accommodation. While the preference of the individual with a disability will be given primary consideration, the County has the discretion to choose between effective accommodations.

The County may not require a qualified individual with a disability to accept an accommodation. If, however, an employee needs accommodation to perform an essential function or to eliminate an impediment, and refuses to accept an effective accommodation, the individual may not be qualified to remain in the job.

The County does not have to provide an accommodation if doing so would impose an undue hardship on the operation of the County's business. Under the ADA, the term "undue hardship" means significant difficulty or expense in, or resulting from, the provision of the accommodation, and takes into account not only the financial difficulty imposed on the County, but also whether the accommodation would be unduly disruptive, costly, expensive, or substantial.

COMPLAINT RESOLUTION PROCEDURES

It shall be the objective of the County to resolve issues of discrimination and/or disparate treatment and/or harassment of members of the protected groups on an informal basis by involving the immediate supervisor and the Human Resources (HR) Director, or designee.

The HR Director is responsible for mediating complaints of discrimination at the early stages by counseling employees in matters of discrimination in employment, disparate treatment, adverse impact, sexual harassment, etc., and by advising or assisting management in the complaint resolution process before a formal grievance is filed by an employee. The process shall remain confidential to the extent reasonably possible but consistent with resolving the complaint. Employees, applicants, and recipients of County services are urged to report complaints as soon as possible.

FORMAL COMPLAINT PROCEDURE:

The County has implemented such EEO practices, including the Complaint Resolution Procedures outlined below, to resolve complaints of discrimination, disparate treatment, and/or harassment of members of protected groups. However, employees should note that nothing in the County's Equal Employment Opportunity Plan or Complaint Resolution procedures prevents an employee from initiating a discrimination complaint, at any time, with any civil rights agency, including the Nebraska Equal Employment Opportunity Commission.

Allegations of discrimination, sexual harassment, or retaliation shall be investigated and dealt with in a fair, unbiased, and timely manner. The County will take prompt action to investigate the complaint and prevent any further instances of such behavior. All employees including, but not limited to, supervisors/managers, department heads, or elected officials shall fully cooperate with any investigation.

The HR Director, or designee, shall provide guidance and recommended appropriate action during any investigation. All complaints shall be thoroughly investigated.

Complaint Reporting and Investigation Procedure for Employees

Discrimination and discriminatory/sexual harassment are serious breaches of policy and may be a violation of the law as well. As a result, a complaint is an extremely serious matter that could have a damaging effect on an accused individual's professional and personal reputation, career, and personal life. Consequently, a complaint of discrimination or discriminatory/sexual harassment should not be used to address complaints for something other than discrimination or discriminatory/sexual harassment or made to achieve some purpose other than the eradication of discrimination or discriminatory/sexual harassment.

1. Any employee who believes he or she has experienced discrimination or discriminatory/sexual harassment is strongly encouraged to immediately report the situation to his or her supervisor or someone within the next level of their chain of command up to an including the Elected Official of a department.
2. Employees are to immediately document the specific conduct, date and time it occurred, the names of those involved including any witnesses, so details are not forgotten.

3. If discrimination or discriminatory/sexual harassment involves a supervisor or someone within the chain of command, employees may report the incident directly to the HR Director or the Civil Division of the County Attorney's Office.
4. The HR Director will work with management to investigate all the facts of the complaint/situation.
5. Managers and supervisors are also responsible to stop discrimination or discriminatory/sexual harassment that comes to their attention through observation or other sources when no formal complaint is filed, and to inform the HR Director of the situation.
6. All discrimination & harassment claims reported to a supervisor or any other management member shall be forwarded to the HR Director.
7. Managers and supervisors who knowingly condone, fail to report, or fail to take action to remedy incidents of discrimination, discriminatory/sexual harassment may themselves be subject to disciplinary sanctions.
8. As soon as an investigation is concluded, an analysis of the facts and evaluation shall be reduced to writing by the HR Director with results the investigation results being disseminated to the Elected Official/Department Head and the Civil Division of the County Attorney's Office.
9. Should a recommendation(s) for corrective action be determined, the HR Director will work with the Elected Official/Department Head to implement necessary changes, and when appropriate corrective disciplinary action will be taken by immediately by the Elected Official/Department Head to rectify the situation.
10. The type of action taken will depend on, among other things:
 - The type and degree of harassment,
 - The employment status and level of responsibility of the offending individual,
 - Any past finding of inappropriate conduct, and
 - The extent of the offending individual's cooperation in the investigation.
11. The action taken may include, but is not limited to:
 - Verbal or written counseling,
 - Referral to professional counseling,
 - Disciplinary suspension or immediate termination from employment, or
 - Any other action permitted by law.
12. In all cases, the final results will be provided to all involved parties.

Complaints are handled on a case-by-case basis and variations in complexity will impact the time it takes to complete the investigation and recommend a course of action.

Complaint Reporting and Investigation Procedure for Applicants and Recipients of County Services

Discrimination and discriminatory/sexual harassment are serious breaches of policy and may be a violation of the law as well. As a result, a complaint is an extremely serious matter that could have a damaging effect on an accused individual's professional and personal reputation, career, and personal life. Consequently, a complaint of discrimination or discriminatory/sexual harassment should not be used to address complaints for something other than discrimination

or discriminatory/sexual harassment or made to achieve some purpose other than the eradication of discrimination or discriminatory/sexual harassment.

1. Any applicant or recipient of County services who believes he or she has experienced discrimination or discriminatory/sexual harassment is strongly encouraged to immediately report the situation to the HR Director.
2. Applicants or recipients of County services are to immediately document the specific conduct, date and time it occurred, the names of those involved including any witnesses, so details are not forgotten.
3. The HR Director will investigate all the facts of the complaint/situation.
4. Managers and supervisors who are involved in discriminatory/sexual harassment may themselves be subject to disciplinary sanctions.
5. As soon as an investigation is concluded, an analysis of the facts and evaluation shall be reduced to writing by the HR Director with the investigation results being disseminated to the County Commissioners and the Civil Division of the County Attorney's Office.
6. Should a recommendation(s) for corrective action be determined, the HR Director will work with the County Commissioners to implement necessary changes, and when appropriate corrective disciplinary action will be taken immediately to rectify the situation.
7. The type of action taken will depend on, among other things:
 - The type and degree of harassment,
 - Any past finding of inappropriate conduct, and
 - The extent of the offending individual's cooperation in the investigation.
8. The action taken may include, but is not limited to:
 - Verbal or written counseling,
 - Referral to professional counseling,
 - Disciplinary suspension or immediate termination from employment or
 - Any other action permitted by law.
9. In all cases, the final results will be provided to all involved parties.

Complaints are handled on a case-by-case basis and variations in complexity will impact the time it takes to complete the investigation and recommend a course of action.

PROHIBITION AGAINST RETALIATION:

Retaliation against any individual for reporting discrimination or discriminatory/sexual harassment or cooperating in an investigation of such a report is considered a serious offense, as it undermines the integrity of the County's policies.

Retaliation is defined as an adverse employment action taken against an employee because the person in good faith reported instances of discrimination and/or discriminatory/sexual harassment or has been a witness/participant in any procedure to investigate or redress a complaint.

To establish a retaliation complaint, complainant must reflect:

1. The basis, for example shows that there was statutorily protected participation or opposition.
2. The issue, for example an adverse employment activity, such as discharge, demotion, failure to hire or other forms of discriminatory action.
3. A causal connection between the participation and opposition (basis) and the adverse employment action (issue).

Reports of perceived retaliation should be made promptly and can be made in the same manner as reports of discrimination or discriminatory/sexual harassment. Those reports will be investigated and resolved in the same manner as reports of discrimination and discriminatory/sexual harassment.

POLICY DISSEMINATION

INTERNAL POLICY DISSEMINATION:

1. A description of the County's Equal Employment Opportunity (EEO) Policy and other EEO-related policies shall be incorporated into the County's Personnel Policy Statements.
2. The County's EEO Policy, other EEO-related policies, and the EEO Plan shall be disseminated and discussed at new employee orientation.
3. The County's EEO Policy and other EEO-related policies shall be communicated to all County employees.
4. The County's EEO Policy and other EEO-related policies shall be displayed in areas where employees or applicants have access to review. Copies of the EEO Policy, other EEO-related policies, and the EEO Plan shall also be available in the HR department.
5. The County's EEO Policy, other EEO-related policies, and the EEO Plan are public records.
6. The HR Director will meet with union officials to inform them of the County's EEO Policy, EEO-related policies, and the EEO Plan and request their cooperation.

EXTERNAL POLICY DISSEMINATION:

1. The EEO Policy, other EEO-related policies, and the EEO Plan shall be provided to organizations identified within the community whose membership includes significant members of minorities, women, and other protected groups.
2. All sources used for recruitment including minority and women's organizations, community agencies, community leaders, high schools, vocational and technical schools, colleges and universities shall be informed of the County's EEO Policy. These sources shall be encouraged to actively recruit and refer minorities, women, and members of other protected groups for all positions within the County.
3. All employment advertisements shall contain the phrase, "Equal Opportunity Employer."

EQUAL EMPLOYMENT OPPORTUNITY POSTERS:

All applicable employment law posters concerning equal employment, age discrimination, equal pay, veterans, and the disabled shall be displayed in a conspicuous place in the Human Resources Department as well as made available on the County's intranet website.

EQUAL EMPLOYMENT OPPORTUNITY PLAN

PURPOSE:

The purpose of this Equal Employment Opportunity (EEO) Plan is to implement the Equal Employment Opportunity (EEO) Policy of the Sarpy County Board of Commissioners. The practices and procedures outlined herein coupled with our good faith efforts will ensure equal employment opportunities within County Government.

OBJECTIVE:

The equal employment opportunity objective of the Sarpy County Board of County Commissioners is to achieve, within a reasonable period of time, an employee profile which is an appropriate reflection of the relevant labor market availability, with respect to race, gender and other protected groups in each major job category.

This objective calls for achieving full utilization of minorities, women, and members of other protected groups at all levels of County government employment, as well as the absence of discrimination in employment because of race, color, national origin, sex, age, disability, genetic information, religious or political affiliation, marital status, or other legally protected group. The objective also calls for a work environment free of unlawful discrimination. The major thrust of the County's efforts to reach the stated objective is through the implementation of an Equal Employment Opportunity Plan. An integral part of the Plan is the goals designed to change the race and gender profile in those areas where an underutilization of protected groups exists.

This shall be accomplished by the adoption of this Plan appointing authorities to meet goals for the inclusion of women and/or minorities who are substantially equally qualified to other applicants for vacancies in targeted job categories. The County assures the full realization of the stated objectives through a continuous procedure of monitoring and reporting.

It should be emphasized that the County's Equal Employment Opportunity Plan is a plan of inclusion rather than exclusion. The goals provided in this Equal Employment Opportunity Plan shall not continue beyond a period reasonably required to eliminate any existing under-representation. Additionally, this Plan seeks to harmonize the need to correct the effects of prior discrimination, where it may have existed, with the need to protect all individuals from the discrimination prohibited by non-discrimination laws. This Plan is designed to use the least restrictive programs and is designed to be remedial.

No employee or witness shall be retaliated against because of filing an internal complaint, or a complaint with an outside agency, or for having voiced opposition to an act believed to be discriminatory, or for having cooperated with an investigation of a discrimination complaint.

The workforce composition will be reviewed on a quarterly basis to ensure proactive hiring and promotions.

The County will provide equal employment opportunity training to supervisory level employees. This will be accomplished by providing training sessions to familiarize supervisors with Sarpy County's Equal Employment Opportunity Plan, specifically how the Plan works and what their responsibilities are under this Plan. In the training sessions, supervisors/managers will review each section of the Plan; discuss the County's goals established under this Plan, and the

process each should utilize to assist in achieving these goals. Those in attendance will include all supervisors who are involved in the County's employment decisions/actions. In addition, the County will emphasize equal employment opportunity awareness to our general employee population through mandatory training classes, such as, *New Employee Orientation as well as Discriminatory Harassment* classes, which include *Sexual Harassment Awareness and Prevention*.

The Human Resources (HR) Director, or designee, is responsible for proactively addressing employee issues and concerns before the employee decides to take more formal measures. The HR Director utilizes effective communication and mediation skills to broker positive employee relations and conflict resolution in the workplace.

For recruiting purposes, the Sheriff's Office for "sworn" employees and the Human Resources Department for all other job opportunities will send information to all minority and female organizations on their recruitment list. The HR department will also place job opportunity announcements on the County's official website, CareerLink, and other applicable third-party recruiters, as these sources provide 24-hour access to potential applicants.

All complaints brought forward are investigated. When requested or as appropriate, reasonable accommodations have been made under the Americans with Disabilities Act (ADA). A review of each selected candidate is performed by the HR department or the Merit Commission to confirm that the best-qualified candidates have been selected.

The County is taking steps to gather relevant data. Therefore, the following pages will show a workforce analysis, Utilization Report, and information required by 28 CFR § 42.301 et seq. once the data is gathered and analyzed.

CURRENT STATUS

JOB CATEGORY TARGETED GROUP

- Officials/Managers:
- Professionals: Technicians:
- Protective Services (sworn): Protective Services (non-sworn):
- Para-Professional: Administrative Support:
- Skilled Craft:

RESERVED PAGES FOR WORKFORCE ANALYSIS AND UTILIZATION

UTILIZATION ANALYSIS

The Utilization Analysis compares the most recent data available of the relevant labor market from the Census 2010 Data Tool EEO Residence Data Results for Sarpy County by occupational category for all permanent employees as of February 2014.

A comparison with the relevant labor market will indicate whether there is **underutilization** of any of the targeted protected groups in the following job categories:

JOB CATEGORY TARGETED PROTECTED GROUP

- Officials/Managers:
- Professionals:
- Technicians:
- Protective Services:
- Para-Professional:
- Administrative Support:
- Skilled Craft:
- Service Maintenance:

Under this Equal Employment Opportunity Plan, by identifying targeted protected groups, the County shall attempt to increase the representations of those targeted. This shall be accomplished by directing, through the adoption of this Plan, appointing authorities to meet goals for the inclusion of women and/or minorities who are substantially equally qualified to other applicants for vacancies in targeted job categories.

ACHIEVING EEO PLAN OBJECTIVES

The County considers its Equal Employment Opportunity Plan a results-oriented program designed to enhance the opportunities and numbers of employees who are minority, female, or members of other protected groups. The ultimate success of this undertaking is largely the result of the good-faith efforts detailed in the Equal Employment Opportunity Plan procedures. In this section the substantive procedures/steps, which are used to convert commitments to measurable progress, are outlined. The following procedures are intended to help achieve the County's EEO Plan objectives:

RECRUITING:

The County shall actively seek minorities, females, and members of other protected groups for employment. In order to improve recruitment and increase the flow of minority and female applicants, the HR department shall regularly contact local minority/female organizations and local, state, and federal employment agencies. The County shall inform these recruiting sources of the County's Equal Employment Policy through distribution of Job Opportunity announcements, which state that the County is an Equal Opportunity Employer.

EMPLOYMENT AND SELECTION:

The minority/gender identities of applicants and new hires shall be reviewed periodically to assure that sufficient numbers are applying for jobs and to assure that the selection process is not adversely impacting upon the County's ability to meet its EEO program goals.

All employees engaged in rendering hiring and promotion decisions shall be trained to assure nondiscrimination in decision-making. The hiring and promotion results shall be reviewed periodically to ensure that non-discrimination is a fact.

All screening mechanisms used shall be for the purpose of determining an individual's suitability for the particular job sought or to meet other lawful purposes. The County shall not use any non-job-related screening mechanism that result in an adverse impact on minorities, females and other members of protected groups.

The County's employment online application shall contain a notice that the County is an Equal Opportunity Employer (EOE). Information, which is collected for EEO purposes only, regarding applicants who have protected group membership, shall not be viewed by individuals making selection decisions.

Hiring authorities will be notified in writing on each list of candidates issued, when that position is a targeted position in accordance with this Plan.

PROMOTIONS:

Where a concern of unequal consideration or opportunity arises, applications of employees shall be reviewed by the Merit Commission (sworn) or the Human Resources (HR) Director (all others) to assure that qualified individuals are given equal consideration and opportunity in all employment actions.

Where additional training and experience would be beneficial for advancement, the Elected Official/Department Head will counsel and assist their employees. Members of underrepresented groups shall be given preference, when substantially equally qualified, for all developmental training designed to enhance an employee's ability to assume targeted positions.

COMMUNITY ACTION:

It is imperative that a good working relationship exists between the County and the community in order to inform the minority, female, veteran, and disabled persons of the employment opportunities in the County. Positive relationships result in creating mutual respect and cooperation.

FACILITIES:

All work areas, lunchrooms, conference rooms, recreational areas, and other County facilities shall be maintained on a racially desegregated basis and ADA accessible as required by law.

OTHER:

A copy of the EEO Policy and Plan signed by the Chair of the Board of County Commissioners shall be posted on bulletin boards designated for staff information and will also be issued to all employees.

The HR Director shall be available on request to speak with any employee concerning work-related problems of discrimination, unequal treatment, as well as illegal and sexual harassment.

PERFORMANCE EVALUATIONS:

Annual performance evaluations for management and supervisory personnel shall evaluate each individual's commitment to equal employment opportunities. The appraisal of equal employment opportunity efforts and results, along with any other criteria necessary, will be used to evaluate whether a manager's job performance is acceptable.

EXIT INTERVIEWS:

Any employee separating from County employment may request and shall be afforded the opportunity of an exit interview. Exit Interviews shall be offered and conducted by the Human Resources Department and include a discussion of the employee's perception of Equal Employment Opportunity in County government and any comments they may have regarding this matter.

INTERNAL AUDIT AND REPORTING

In order for the County government to assess its objective of achieving, within a reasonable period of time, an employment profile with respect to protected groups in each job category, a systematic approach must be taken to monitor the results of the County's program. The systematic approach described below should enable the County to evaluate results and to plan for the future.

The following reports shall be generated by Human Resources at least bi-annually and include EEO-4 race and gender designation:

- Permanent Full-Time Employees
- Permanent Full-Time Employees grouped by Occupational Category and by Salary Level
- New Hires
- Employment
- Disciplinary Actions

Where appropriate, the Human Resources Department shall also be responsible for the following:

- Analysis of progress toward goals and objectives (numerical and non-numerical).
- Review of program effectiveness designed to assist in obtaining goals and objectives.
- Analysis of performance reviews, promotions, transfers, discipline, and exit interviews of minorities, females, and other protected classes to determine whether or not disparate treatment or adverse impact exists.
- Review of Job Opportunity announcements; newspaper advertisement and placement; and other recruitment, referral, and employment records.
- Review of training, education, and management-level development programs.



**SCHEDULE OF EXPENDITURES
OF FEDERAL GRANTS
As of January 24, 2014**

Federal Financial Assistance Programs	CFDA #	2013 FY Expenditures	ARRA Funds Y/N	Source of Amount Reported	2013 Expenses reimb in 2013 FY	2013 FY A/R Expenses not reimb by 6/30/13	Fund
U.S. Department of Health and Human Services							
Passed through Nebraska Dept. of Health and Human Services:				2013/2014		(On 2013 report	
Child Support				Reports		or not yet rec'd)	
District Court	93.563	\$ 157,859.00	No	20	\$ 38,016.00	\$ 119,843.00	0980
County Attorney	93.563	\$ 872,880.00	No	21	\$ 426,315.00	\$ 446,565.00	0985
Incentive Program (Indirect Admin & Incentive)	93.563	\$ 44.00	No	15		\$ 44.00	0100
Incentive Program (Indirect Admin & Incentive)	93.778	\$ 16,366.00	No	15		\$ 16,366.00	0100
Incentive Program (CS-CA Incentive)	93.563	\$ 144,981.00	No	22	\$ 144,981.00		0986
Total U.S. Dept. of Health and Human Services		\$ 1,192,130.00			\$ 609,312.00	\$ 582,818.00	
U.S. Department of Education							
Passed through Papillion/LaVista School District							
FG-Title 1D	84.010	\$ 46,374.00	No	24	\$ 36,225.00	\$ 10,149.00	2372
Passed through Nebraska Department of Education		\$ -					
FG-Perkins Corrections	84.048	\$ 40,000.00	No	34	\$ 8,127.00	\$ 31,873.00	2547
Total U.S. Department of Education		\$ 86,374.00			\$ 44,352.00	\$ 42,022.00	
U.S. Department of Justice							
Passed through Nebraska Crime Commission							
FG-JAIBG	16.523	\$ 16,100.00	No	23	\$ 16,100.00		2371
FG-Victim Witness	16.575	\$ 107,527.00	No	30	\$ 104,626.00	\$ 2,901.00	2500
FG-Truancy	16.540	\$ 44,458.00	No	25	\$ 44,458.00	\$ -	2377
FG-JDAI		\$ 7,955.00	No	26	\$ 7,955.00	\$ -	2379
Passed through City of Omaha							
Drug Enforcement	16.738	\$ 50,416.00	No	29	\$ 50,416.00		2560
Passed through NE Crime Commission & Heartland Family Services							
Domestic Violence Attorney-County Attorney	16.588	\$ 28,200.00	No	9	\$ 25,850.00	\$ 2,350.00	0100
FG-Drug Eradication	N/A	\$ 19,458.00	No	40	\$ 19,458.00		2593
Prisoner Housing - U.S. Marshall	16.Unknown	\$ 1,512.00	No	12	\$ 1,512.00	\$ -	0100
Federal Forfeitures	16.922	\$ 49,320.00	No	27	\$ 49,320.00		2411
Justice Benefits Reimbursement	16.606	\$ 36,858.00	No	28	\$ 36,858.00		2412
Justice Benefits Reimbursement-Social Security Incentive		\$ 4,800.00	No	29	\$ 4,800.00		2413
FBI Overtime Reimbursement - Cyber Crimes Task Force (MOU)	N/A	\$ 4,152.00	No	11	\$ 3,687.00	\$ 465.00	0100
Ballistic Vest Program Reimbursement	16.607	\$ 1,595.00	No	10		\$ 1,595.00	0100
FG-JAG Equipment	16.738	\$ 11,951.00	No	37	\$ 7,094.00	\$ 4,857.00	2566
Total U.S. Department of Justice		\$ 384,302.00			\$ 372,134.00	\$ 12,168.00	
U.S. Dept. of Transportation							
Passed through Nebraska Office of Highway Safety							
FG-Traffic Enforcement Grant	20.600	\$ 163,444.00	No	1a-1l	\$ 147,683.00	\$ 15,761.00	2578
Click It or Ticket-November	20.205	\$ 3,607.00	No	5	\$ 3,607.00		0100
You Drink, Drive, You Lose-December	20.205	\$ 2,235.00	No	4	\$ 2,235.00		0100
In-Car Cameras	20.601	\$ 9,889.00	No	2	\$ 9,889.00		0100
Cab Fare Program	20.601	\$ 7,849.00	No	3	\$ 7,849.00		0100
DUI Checkpoint	20.205	\$ 1,137.00	No	6	\$ 1,137.00		0100
You Drink, Drive, You Lose-August	20.205	\$ 5,604.00	No	7	\$ 5,604.00		0100

	CFDA #	2013 FY Expenditures	ARRA Funds Y/N	Source of Amount Reported	2013 Expenses reimb in 2013 FY	2013 FY A/R Expenses not reimb by 6/30/13	Fund
Federal Financial Assistance Programs							
Click It or Ticket-May	20.205	\$ 5,872.00	No	42	\$ -	\$ 5,872.00	0100
Preliminary Breath Testers	20.601	\$ 3,420.00	No	46	\$ 3,420.00		0100
Passed through Metro Area Planning Agency		\$ -					
FG-GIS Transportation	20.505	\$ 110,738.00	No	38	\$ 104,170.00	\$ 6,568.00	2581
Passed through Nebraska Game & Parks Commission							
Marv Holubar Trail Grant	20.219	\$ 9,113.00	No	44	\$ -	\$ 9,113.00	0200
Total U.S. Department of Transportation		\$ 322,908.00			\$ 285,594.00	\$ 37,314.00	
U.S. Department of Homeland Security							
Passed through Nebraska Emergency Management Association							
Civil Defense Reimbursement	97.042	\$ 100,204.00	No	14	\$ 44,898.00	\$ 55,306.00	0100
Passed through City of Omaha & State of Nebraska							
Reimbursement-NE NENAQ APCO Conference	97.067	\$ 7,154.00	No	19	\$ 7,154.00		0100
Reimbursement-APCO NENA Conference	97.067	\$ 6,127.00	No	18	\$ 6,127.00		0100
GIS Software	97.067	\$ 3,700.00	No	41	\$ 3,700.00	\$ -	5650
Total U.S. Department of Homeland Security		\$ 117,185.00			\$ 61,879.00	\$ 55,306.00	
Immigration & Customs Enforcement							
US Immigrations-Juveniles	Unknown	\$ 3,147.00	No	13	\$ 257.00	\$ 2,890.00	0100
Total Immigration & Customs Enforcement		\$ 3,147.00			\$ 257.00	\$ 2,890.00	
Department of Housing & Urban Development							
Passed through Nebraska Department of Economic Development							
CDBG Revolving Loan-Sergeants Pet Care	14.228	\$ 504,500.00	No	30	\$ 500,000.00	\$ 4,500.00	2502
Total Department of Housing & Urban Development		\$ 504,500.00			\$ 500,000.00	\$ 4,500.00	
SUPPLEMENTAL DISCLOSURE-FEDERAL SECONDARY MONEY							
PASSED THROUGH STATE OF NEBRASKA							
Federal Aid Secondary - Project MAPA-5005(1)	20.205	\$ 149,341.00	No	43	\$ 149,341.00	\$ -	0200
Federal Aid Secondary - Project MAPA-5005(1)	20.205	\$ 12,662.00	No	43	\$ -	\$ 12,662.00	0200
Federal Aid Secondary - Project SRTS-77(53)	20.205	\$ 3,232.00	No	43	\$ -	\$ 3,232.00	0200
Total Federal Aid Secondary		\$ 165,235.00			\$ 149,341.00	\$ 15,894.00	
Total Federal Financial Assistance Programs-(Received funds)		\$ 2,779,781.00			\$ 2,022,869.00	\$ 752,912.00	
SUB-RECIPIENTS OF SARPY COUNTY:							
CITY OF BELLEVUE:							
FG-JAG EQUIPMENT	16.738	\$ 5,570.00	No		\$ 5,570.00		2566
FG-TRAFFIC ENFORCEMENT	20.600	\$ 67,477.88	No		\$ 67,477.88		2578
TOTAL 2013 FY EXPENSES		\$ 73,047.88			\$ 73,047.88		
<i>These amounts have already been included in above amounts.</i>							