



BAIRD HOLM^{LLP}
ATTORNEYS AT LAW
EST. 1873

1700 Farnam Street, Suite 1500 • Omaha, NE 68102 • 402.344.0500

Papio-Missouri River NRD

AFFIRMATIVE ACTION PROGRAM FOR THE DISABLED & VETERANS (Narrative Only)

Contractor: Papio-Missouri River NRD
8901 South 154th Street
Omaha, NE 68138

EEO Contact: Ms. Jean Tait
Administrative Coordinator
Papio-Missouri River NRD
8901 South 154th Street
Omaha, NE 68138
402-444-6222

January 1, 2025 to December 31, 2025

EQUAL EMPLOYMENT OPPORTUNITY POLICY
41 C.F.R. Section 60-741.44(a); 41 C.F.R. Section 60-300.44(a)

It is the policy at Papio-Missouri River Natural Resources District to provide equal employment and advancement all qualified individuals. To achieve this goal, Papio-Missouri River Natural Resources District is dedicated to taking action to employ and advance in employment protected veterans and individuals with disabilities. All personnel actions, including compensation, benefits, recruitment, hiring, training, and promotion in all job titles, will be administered without regard to protected veteran or disability status employment decisions are based solely on valid job requirements. In addition, employees protected from harassment, threats, coercion, intimidation, or discrimination for:

1. Filing a complaint;
2. Assisting or participating in an investigation, compliance review, hearing, or any other activity under Section 503 of the Rehabilitation Act of 1973 ("Section 503"), as amended, 29 U.S.C. § 793, Vietnam Era Veterans' Readjustment Assistance Act of 1974 ("VEVRAA"), as amended, 38 U.S.C. § 4212, or any other Federal, State or local law requiring equal opportunity for disabled persons and other protected veterans;
3. Opposing any practice made unlawful by the Section 503, VEVRAA, or any other Federal, State, or local law requiring equal opportunity for disabled persons and other protected veterans; or
4. Exercising any other right protected by Section 503, VEVRAA, or the implementing regulations.

This EEO policy has the full support of John G. Winkler, General Manager, who has assigned responsibility for its implementation to Jean Tait, Administrative Coordinator. Papio-Missouri River Natural Resources District has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

A copy of the Equal Employment Opportunity statement that reaffirms Papio-Missouri River Natural Resources District's commitment to protected veterans and individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability.

REVIEW OF PERSONNEL PROCESSES
41 C.F.R. Section 60-741.44(b); 41 C.F.R. Section 60-300.44(b)

Papio-Missouri River Natural Resources District periodically reviews its employment procedures to ensure careful, thorough and systematic consideration of the job qualifications of known disabled individuals and protected veteran applicants for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review shall also ensure that personnel procedures do not stereotype individuals with disabilities and protected veterans in a manner which limits their access to jobs for which they are qualified. When protected veterans are considered for employment, only that portion of the individual's military record, including discharge papers, that is relevant to the requirements of the position will be considered.

To facilitate compliance with this requirement, some or all of the following procedures have been implemented:

1. The application or personnel form of each known applicant with a disability or each known protected veteran may be annotated to identify each vacancy for which the applicant was considered and will be retrievable for review for use in investigations and internal compliance activities.
2. The application or personnel form of each known applicant with a disability or each known protected veteran may include the identification of each promotion and training program for which that employee was considered.
3. When a protected veteran employee or applicant is rejected for employment, promotion, or training, a statement of the reason may be appended to the personnel file.
4. When an employee or applicant with a known disability or a protected veteran status, is rejected for employment, promotion, or training, a statement of the reason may be appended to the personnel file along with a description of any reasonable accommodation considered.
5. When an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability or disabled veteran, the personnel record may contain a description of the reasonable accommodation.

PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. Section 60-741.44(c); 41 C.F.R. Section 60-300.44(c)

At least annually, Papio-Missouri River Natural Resources District reviews physical and mental job qualification requirements as openings occur, to ensure to the extent qualification requirements tend to screen out qualified disabled individuals, they are job-related and consistent with business necessity and the safe performance of the job.

To the extent that physical or mental job qualification requirements tend to screen out qualified disabled individuals in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, Papio-Missouri River Natural Resources District assures that the requirements are related to the specific job(s) for which the individual is being considered and are consistent with business necessity and the safe performance of the job.

REASONABLE ACCOMMODATION
41 C.F.R. Section 60-741.44(d), 41 C.F.R. Section 60-300.44(d)

Papio-Missouri River Natural Resources District makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations do not impose an undue hardship on the conduct of its business. When an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee will be notified of the performance problem and asked if the problem is related to the disability. If the employee indicates the performance problems are related to his or her disability, the employee will be asked if reasonable accommodation is needed.

Papio-Missouri River Natural Resources District makes reasonable accommodation to the special needs of disabled individuals and disabled veterans including access to the building, utilization of rest room facilities, and mobility requirements within the building and parking locations.

HARASSMENT
41 C.F.R. Section 60-741.44(e); 41 C.F.R. Section 60-300.44(e)

Papio-Missouri River Natural Resources District has developed and maintains procedures to ensure that its employees are not harassed because of a disability or status as a protected veteran.

EXTERNAL DISSEMINATION OF POLICY
41 C.F.R. Section 60-741.44(f), 41 C.F.R. Section 60-300.44(f)

Papio-Missouri River Natural Resources District undertakes the following appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified disabled individuals and protected veterans:

1. Papio-Missouri River Natural Resources District incorporates the Equal Opportunity Clause regarding protected veterans and individuals with disabilities in its purchase orders, leases and contracts as required by law, executive order, and regulation. Written notification of the Equal Opportunity Policy is sent to all subcontractors, vendors, and suppliers requesting appropriate action on their part.
2. Papio-Missouri River Natural Resources District notifies all applicants of the EEO policy and invites them to self-identify. Application forms state Papio-Missouri River Natural Resources District's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.
3. Outreach and recruitment activities that may be undertaken as needed by Papio-Missouri River Natural Resources District include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for protected veterans and individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:
 - The Local Veterans' Employment Representative in the local employment service office (One-Stop) nearest the contractor's establishment;
 - The Department of Veterans Affairs Regional Office nearest the contractor's establishment;
 - The veterans' counselors and coordinators ("Vet-Reps") on college campuses;
 - The service officers of the national veterans' groups active in the area of the contractor's establishment;
 - Local veterans' groups and veterans' service centers near the contractor's establishment;
 - Listing job openings with the National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it;
 - The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP;

- Any organization listed in the Employer Resources section of the National Resource Directory (<http://www.nationalresourcedirectory.gov/>), or any future service that replaces or complements it;
 - The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the area of the contractor's establishment;
 - The Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor's establishment;
 - The Department of Veterans Affairs Regional Office nearest the contractor's establishment (www.va.gov);
 - Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) (www.earnworks.com);
 - Local Employment Network (EN) organizations (other than the contractor, if the contractor is an EN) listed in the Social Security Administration's Ticket to Work Employment Network Directory (www.yourtickettowork.com/endir);
 - Local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;
 - Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
 - Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.
4. All employment openings (except executive and top management, positions that are filled from within, and positions lasting three days or less) are listed at the appropriate state employment services office.
 5. Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources and feedback on disposition of applicants are conducted when appropriate.
 6. Papio-Missouri River Natural Resources District develops internal communication of these outreach efforts in a manner that fosters understanding, acceptance, and support among executive management, supervisors, and all other employees.

7. Meaningful contacts are established with veteran's service organizations and organizations for individuals with disabilities for such purposes as advice, technical assistance and referral of potential employees.
8. Good faith efforts are made to consider protected veterans and applicants with known disabilities for all available positions for which they may be qualified, to the extent practicable.
9. Recruitment at educational institutions will include efforts to reach students who are protected veterans.
10. Recruitment programs established with schools incorporate efforts to reach students with disabilities. Efforts may be made to participate in work-study programs with rehabilitation facilities and schools specializing in training or educating individuals with disabilities.
11. When appropriate, efforts may be made to participate in work-study programs with the Department of Veterans Affairs' rehabilitation facilities which specialize in training or educating disabled veterans.
12. Efforts are made to include individuals with disabilities when employees are pictured in consumer, promotional or help wanted advertisements.

ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS
41 C.F.R. Section 60-300.44(f)(3); 41 C.F.R. Section 60-741.44(f)(3)

At least annually, Papio-Missouri River Natural Resources District reviews the outreach and recruitment efforts it has taken over the previous twelve (12) months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and qualified individuals with disabilities. Each evaluation is documented, including at a minimum the criteria used to evaluate the effectiveness of each effort and the conclusion as to whether each effort and the totality of the efforts are effective. Among these criteria are the Data Collection Analysis for the current year and the two most recent previous years. If Papio-Missouri River Natural Resources District concludes the totality of its efforts are not effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities, alternative outreach and recruitment efforts are identified and implemented.

Papio-Missouri River Natural Resources District concludes that each and the totality of, its efforts are effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities.

INTERNAL DISSEMINATION OF POLICY
41 C.F.R. Section 60-741.44(g); 41 C.F.R. Section 60-300.44(g)

Papio-Missouri River Natural Resources District has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities and protected veterans. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to meet this obligation.

1. Papio-Missouri River Natural Resources District Notices. The EEO policy statement is included in a policy manual and/or posted on the employee bulletin board in a manner and place that ensures individuals with disabilities and protected veterans are informed of its contents. This notice states the name of the EEO Coordinator, the support of top-level management toward this policy, and to whom questions, comments, or complaints should be directed. A statement is included that employees are protected from coercion, intimidation, interference or discrimination for filing a complaint or assisting in an investigation under the applicable affirmative action laws. All required state and federal EEO notices are also posted on bulletin boards.
2. Meetings. Our overall commitment, top-level management support, and specific implementation of the plan are discussed periodically with management personnel. Periodic meetings may also be held with all employees to discuss our commitment to this policy and the responsibilities of individual employees. Our policy is also discussed in employee orientation and any management training programs.
3. Notice of Affirmative Action Plan. Papio-Missouri River Natural Resources District affirmative action plan is available in the office of the EEO Coordinator for employee review.
4. Company publications. This policy and articles on accomplishments of disabled and veteran workers will be publicized in any company newspapers, magazines, annual reports, or other publications when appropriate. When employees are featured in publications, disabled individuals and veterans will be included.
5. Union Contracts. Where/when applicable, a non-discrimination clause will be included in any union contracts and any such contract will be reviewed to ensure that they are non-discriminatory.

AUDIT AND REPORTING SYSTEM
41 C.F.R. Section 60-741.44(h); 41 C.F.R. Section 60-300.44(h)

Papio-Missouri River Natural Resources District has designed and implemented an audit and reporting system that:

1. Measures the effectiveness of the affirmative action program.
2. Indicates any need for remedial action.
3. Determines the degree to which the objectives have been attained.
4. Determines whether individuals with known disabilities have had the opportunity to participate in all company sponsored educational, training, recreational and social activities.
5. Measures compliance with the affirmative action program's specific obligations.

Where the affirmative action program is found to be deficient, corrective action will be taken to bring the program into compliance.

RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. Section 60-741.44(i); 41 C.F.R. Section 60-300.44(i)

Jean Tait, Administrative Coordinator, has been designated to direct the activities of the Affirmative Action Program. Jean Tait has the full support of John G. Winkler, General Manager, in carrying out Papio-Missouri River Natural Resources District's Affirmative Action Policy. Jean Tait will be responsible for:

1. Developing policy statements, affirmative action programs, and internal and external communication to include discussions with managers, supervisors and employees to ensure the policies are followed;
2. Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts;
3. Identifying and discussing any problem areas with management, and developing solutions;
4. Serving as a liaison between Papio-Missouri River Natural Resources District and community groups, governmental agencies, and vocational rehabilitation organizations;
5. Maintaining an audit and reporting system to monitor the progress of the Affirmative Action Program;
6. Informing management of the latest developments in the affirmative action and equal employment opportunity area;
7. Serving as a liaison between Papio-Missouri River Natural Resources District and organizations for disabled persons and protected veterans;
8. Assisting in career counseling for disabled and protected veteran employees;
9. Ensuring that the policy statement and required posters are posted on bulletin boards; and
10. Ensuring that employees placed through these policies are not harassed.

TRAINING

41 C.F.R. Section 60-741.44(j); 41 C.F.R. Section 60-300.44(j)

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are trained to ensure knowledge of equal employment opportunity and affirmative action laws. Educational and training programs may be offered to employees to assist in their personal development as well as to increase their skills and ability to perform on the job. Papio-Missouri River Natural Resources District will continue to ensure that all employees have the opportunity to participate in such programs without regard to disabled or veteran status.

DATA COLLECTION ANALYSIS
41 C.F.R. Section 60-300.44(k), 41 C.F.R. Section 60-741.44(k)

Papio-Missouri River Natural Resources District has documented the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

1. The number of applicants who self-identified as protected veterans pursuant to § 60-300.42(a), or who are otherwise known as protected veterans;
2. The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities;
3. The total number of job openings and total number of jobs filled;
4. The total number of applicants for all jobs;
5. The number of protected veteran applicants hired;
6. The number of applicants with disabilities hired; and
7. The total number of applicants hired.

SIGNATURES

Papio-Missouri River Natural Resources District has prepared this Affirmative Action Program for the period of January 1, 2025 through December 31, 2025.

Papio-Missouri River Natural Resources District



Administrative Coordinator

11/21/2025
Date



General Manager

11/21/2025
Date