

**OFFICE OF FEDERAL CONTRACT
COMPLIANCE PROGRAMS (OFCCP)
SAMPLE CONTRACTOR AFFIRMATIVE
ACTION PROGRAM (AAP)
FOR SECTION 503**

(FOR EDUCATIONAL AND INFORMATIONAL PURPOSES ONLY)

**FEDERAL CONTRACTOR, INC. (FCI)
AFFIRMATIVE ACTION PROGRAM (AAP)
FOR INDIVIDUALS WITH DISABILITIES
(IWD)**

(January 1, 2015 to December 31, 2015)

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II. Policy Statement on Equal Employment Opportunity for Individuals with Disabilities [41 CFR 60-741.44(a)]

As the Chief Executive Officer of Federal Contractor, Inc. (FCI), I am committed to the principles of affirmative action and equal employment opportunity for individuals with disabilities. Therefore, it is the policy of FCI not to discriminate on the basis of disability and to take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels within the company. FCI will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, will be administered without regard to disability. FCI will also provide qualified applicants and employees with disabilities with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements.

FCI prohibits harassment of employees and applicants on the basis of disability and will conduct training to try to prevent any harassment or discrimination before it occurs. FCI also prohibits retaliation or punishment against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing regarding FCI's employment practices, or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities. Prohibited retaliation includes, but is not limited to harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

In furtherance of FCI's policy regarding affirmative action and equal employment opportunity, FCI has developed a written Affirmative Action Program (AAP) that sets forth the policies, practices and procedures that FCI is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request, during normal business hours, in FCI's Administrative Department office located at _____. Interested persons should contact the Human Resources Office at _____ for assistance.

In order to ensure equal employment opportunity and affirmative action throughout all levels of FCI, I have designated FCI's Director of Human Resources as the Equal Employment Opportunity (EEO) Officer for FCI. The EEO Officer will establish and maintain an internal audit and reporting system that will track and measure the effectiveness of FCI's AAP and show where additional action is needed to meet FCI's objectives.

Roger Wilco

January 1, 2015

Federal Contractor, Inc.

III. Review of Personnel Processes [41 CFR 60-741.44(b)]

To comply with the requirement to “periodically review” its personnel processes, FCI reviews its personnel processes annually to determine whether its present procedures assure careful, thorough, and systematic consideration of the qualifications of known individuals with disabilities. As part of this review, FCI also ensures that its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

Based upon FCI’s most recent review of its personnel processes, FCI has implemented the following modifications to its personnel processes to come into compliance:

1. Ensure accessibility of personnel processes.

FCI will ensure that applicants and employees who are individuals with disabilities have equal access to all of its personnel processes. Although it is not required to do so, as a best practice in furtherance of that commitment, FCI is in the process of making its job application, time and attendance, and employee benefits electronic systems conform to the Web Content Accessibility Guidelines (WCAG 2.0) promulgated by the World Wide Web Consortium Web Accessibility Initiative and will complete these upgrades by December 31, 2015. FCI believes that taking these steps now will help minimize the need for future reasonable accommodations and facilitate ready access to key systems for many applicants and employees with disabilities. Also, as part of the upgrading of our job application system, FCI will ensure that human resources office contact information is prominently displayed to facilitate requests for reasonable accommodation from applicants with disabilities.

2. Invite all applicants to voluntarily self-identify as having a disability before an offer of employment is made.

On May 1, 2014, FCI began inviting all applicants to voluntarily inform FCI whether they are individuals with disabilities before an offer of employment is made in compliance with 41 CFR 61-741.42(a) using the form prescribed by OFCCP. FCI provides the self-id form prescribed by OFCCP to all applicants along with FCI’s required paper application forms. Additionally, FCI has modified its electronic application system and created a fillable copy of the required self-id form using the parameters outlined by OFCCP in its FAQs. FCI also created a separate electronic file where it stores all self-id information separate from employment applications, personnel records, and employee medical files. FCI also continues to invite applicants to voluntarily self-identify as individuals with disabilities after a job offer has been made, but before the applicant begins work, in compliance with 41 CFR 61-741.42(b). FCI uses the form prescribed by OFCCP to invite this post-offer self-identification, and stores all self-id responses in the separate electronic file created for this purpose.

3. Invite self-identification of disability from all FCI employees every five years.

In compliance with 41 CFR 60-741.42(c), FCI invited all of its current employees to voluntarily inform FCI whether they are individuals with disabilities via an email sent on May 1, 2014, and will do so every five years thereafter. The email contained a link to the electronic self-id form, and also indicated to employees that paper self-id forms are available in FCI's human resources office. Employees were asked to reply by May 8, 2014. FCI will also remind employees via email three years after the most recent invitation that they can voluntarily update their disability status with FCI at any time. The next reminder will be sent to employees on May 1, 2017, and the next all-employee invitation to self-identify is scheduled for May 1, 2019.

4. Modify applicant flow logs.

FCI recognizes that it must collect applicant and hiring data to comply with the requirements of 41 CFR 60-741.44(k). In order to facilitate the accurate tracking of applicant and hiring data for individuals with disabilities, FCI has modified its applicant flow logs accordingly. (*See Part XI. A.*) Applicant flow logs will be maintained confidentially.

5. Documentation and Assessment of the Effectiveness of Outreach and Recruitment Activities

FCI has always engaged in positive outreach and recruitment for individuals with disabilities, as required by OFCCP regulations. FCI has begun documenting each outreach and recruitment activity to comply with the requirements of the new Section 503 regulations, and will conduct an annual assessment to evaluate the effectiveness of the totality of our outreach and recruitment efforts, as required by 41 CFR 60-741.44(f)(3)). FCI will institute procedures to comply with the requirements of this part and will conduct its first annual assessment with data collected during the 2015 AAP year, starting in 2016.

FCI will evaluate the results of each outreach and recruitment activity using the following criteria, which includes data collected under 41 CFR 60-741.44(k), to see if it is producing measurable results:

1. To what extent did the activity attract qualified applicants with disabilities?
2. To what extent did the activity result in the hiring of qualified individuals with disabilities?
3. To what extent did the activity expand FCI's outreach to individuals with disabilities in the community?
4. To what extent did the activity increase FCI's capacity/capability to include individuals with disabilities in its workforce?

FCI will utilize the same criteria to conduct its annual assessment of the totality of its outreach and recruitment efforts. If FCI concludes that the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, FCI will explore and implement alternative outreach and recruitment methods. FCI will document its outreach and recruitment activities and its assessments of these activities, and retain these documents for three years.

IV. Review of Physical and Mental Job Qualification Standards [41 CFR 60-741.44(c)]

To comply with the requirement to “periodically review” its physical and mental job qualification standards, FCI reviews the physical and mental job qualifications of each job opening before it is publicly posted to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. FCI also conducts a periodic review of all job qualification standards every three years (except for those job qualification standards that FCI has reviewed within the previous twelve months) to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are job-related and consistent with business necessity. The last review was completed on December 1, 2014.

Appropriately trained personnel conducted the review and identified no physical or mental job qualification requirements that are likely to screen out qualified individuals with disabilities. Nevertheless, to ensure our compliance, FCI strives to use only job qualification standards that are job-related and consistent with business necessity. The review found all job qualification requirements to be job-related and consistent with business necessity.

FCI will continue to review physical and mental job qualification requirements whenever a job vacancy will be filled through either hiring or promotion and will conduct a qualifications review whenever job duties change.

No pre-employment physical examinations or medical questionnaires are used in FCI’s hiring process.

If at any time in the future, FCI should inquire into an applicant’s physical or mental condition or should require the conduct of a medical examination, FCI affirms that such inquiries or exams will be conducted in accordance with the Section 503 regulations and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will only be used in accordance with the Section 503 regulations.

V. Reasonable Accommodation [41 CFR 60-741.44(d)]

FCI will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless such accommodation would impose an undue hardship on the conduct of its business. FCI also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation, and any other potential accommodations, would cause significant difficulty or expense, as provided for in the Section 503 regulations.

When an employee with a known disability has 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 is confidentially notified of the performance problem and asked if the problem is related to the disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

FCI will also ensure that all requests for reasonable accommodation and any medical or disability-related information provided to FCI will be treated as confidential medical records and maintained in a separate medical file.

Because FCI strives to be a model employer, it is currently drafting reasonable accommodation procedures using the optional guidance in Appendix B of 41 CFR Part 60-741.

VI. Anti-Harassment Procedures [41 CFR 60-741.44(e)]

Employees and applicants of FCI will not be subject to harassment because of disability. Any employee or applicant who believes that they have been subject to harassment because of their disability should promptly contact a manager in their chain of command, or promptly contact the Director of Human Resources at 555-555-1213 for assistance. Employees or applicants may also file a written complaint with the office of the Director of Human Resources, [insert address].

Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding individuals with disabilities is prohibited. Any employee or applicant who believes that he or she has been subject to retaliation should contact the Director of Human Resources at 555-555-1213 for assistance.

This anti-harassment policy is communicated to all employees and managers annually via e-mail, most recently on December 1, 2014, and a notice is posted in the personnel office.

Additionally, training is provided annually on the identification and prevention of harassment based on disability to all of FCI's employees. Furthermore, FCI monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

VII. External Dissemination of Policy [41 CFR 60-741.44(f)]

FCI provided written notification of FCI's Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities to all current subcontractors, vendors, and suppliers on June 1, 2014 and will continue to do so on an annual basis. FCI will also provide such written notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them.

FCI has informed its recruiting sources, including State employment agencies, educational institutions and social service agencies, of the company's policy concerning the employment of qualified individuals with disabilities and will notify them of employment opportunities as they become available. FCI requested all recruiting sources to actively recruit and refer qualified persons for job opportunities.

FCI will include the equal opportunity clause concerning the employment of qualified individuals with disabilities in all non-exempt subcontracts and purchase orders.

VIII. Outreach and Positive Recruitment [41 CFR 60-741.44(f)]

a. FCI's Outreach and Positive Recruitment Activities

| Outreach/Recruitment Activity | Date of Activity | Description | Evaluation of Each Activity |
|--|-------------------|---|-----------------------------|
| Annual meeting with State Vocational Rehabilitation Service Agency (SVRA) | November 15, 2014 | Will provide information regarding FCI job openings to SVRA starting January 1, 2015. | |
| Listing of jobs with Employment One-Stop Center | Recurring | All jobs are posted with Employment One-Stop Career Center. | |
| Briefing of Local Disability Advocates (LDA) | September 1, 2014 | Briefed representatives of LDA, a local disability advocacy group, regarding FCI's services and job opportunities, and provided an FCI facility tour. | |
| Assessment of Effectiveness of Totality of Outreach/Recruitment Efforts: | | | |
| <p>Criteria for Evaluation:</p> <ol style="list-style-type: none"> 1. To what extent did the activity attract qualified applicants with disabilities? 2. To what extent did the activity result in the hiring of qualified individuals with disabilities? 3. To what extent did the activity expand FCI's outreach to individuals with disabilities in the community? 4. To what extent did the activity increase FCI's capacity/capability to include individuals with disabilities in its applicant pool and workforce? | | | |

b. Future Assessment of External Outreach and Recruitment Efforts [41 CFR 60-741.44(f)(3)]

FCI will begin assessing its outreach and recruitment efforts annually, using the above stated evaluation criteria, starting in 2015 and will document such assessment for inclusion in FCI's 2016 AAP. This will include an assessment of the effectiveness of each individual effort, as well as an assessment of the effectiveness of the totality of our efforts for the year. Because FCI currently has limited applicant and hiring data for individuals with disabilities, which it began collecting June 1, 2014, we can only perform a limited assessment of the effectiveness of our outreach and recruitment efforts at this time. Starting in 2015, FCI will have more complete data from which to perform a comprehensive assessment of whether our efforts are effective in recruiting individuals with disabilities into its

workforce. FCI documents all of its outreach and recruitment efforts and maintains these documents, including the written assessments of the effectiveness of these efforts, for three years, in accordance with 41 CFR 60-741.44(f)(4).

c. Future Outreach and Positive Recruitment Activities

FCI plans to expand its outreach and positive recruitment efforts in 2015. FCI will participate in the upcoming annual job fair hosted by a consortium of regional disability advocacy groups, and is exploring the creation of an internship program for students with disabilities with the nearby state university college. FCI will also begin hosting briefing sessions and facility tours for representatives of local disability advocacy groups that provide employment services to individuals with disabilities.

IX. Internal Dissemination of Policy [41 CFR 60-741.44(g)]

FCI has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. FCI's procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help FCI meet this obligation.

FCI makes copies of its AAP available for inspection to any employee or applicant upon request. FCI also incorporates the company's affirmative action and equal employment opportunity policies into the FCI Human Resources Manual and updates this manual as needed. The policies are emailed to all employees annually and discussed in employee orientation programs, such as FCI's New Employee Orientation seminar. Additionally, FCI's affirmative action policy and EEO poster are placed on bulletin boards located throughout FCI's facilities and office work areas, and electronic versions of these notices are posted and clearly labeled on FCI's company-wide intranet. A clearly labeled link to an electronic version of the EEO poster is also included in FCI's electronic job application system.

FCI managers and supervisors are provided with affirmative action and EEO training upon taking their management roles and are briefed annually on these policies. The last such management briefing was held on June 1, 2014. FCI also notified union officials and employee representatives of these policies on June 1, 2014 and will send them reminders on an annual basis.

X. Audit and Reporting System [41 CFR 60-741.44(h)]

The FCI Director of Human Resources has the responsibility for developing and preparing the formal documents of the AAP. The Director of Human Resources is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each department manager and supervisor.

FCI conducts an annual audit of personnel activities to ensure such activities are free from discrimination against or stereotyping of individuals with disabilities in any manner. The results of FCI's most recent self-audit are included in Part XI. A. During the self-audit, the following activities were reviewed:

- Recruitment, advertising, and job application procedures;
- Implementation of hiring, promotion, upgrading, award of tenure, layoff, and recall from layoff practices;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Implementation of reasonable accommodation policies and procedures;
- Awarding of sick leave, leaves or absence, or implementation of any other leave policies;
- Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings/conferences; and
- Application of any other term, condition, or privilege of employment, including participation in company-sponsored educational, training, recreational, and social activities.

The CEO has also directed the Director of Human Resources to submit a quarterly report documenting FCI's efforts to comply with its EEO/AAP Responsibilities, discussing any identified EEO/AAP problem areas along with recommended remedial actions, and providing an update regarding the status of FCI's AAP objectives. Managers and supervisors are asked to report any current or foreseeable EEO problem areas to the Director of Human Resources and are asked to outline their suggestions or recommendations for solutions.

The following documents are maintained as a component of FCI's internal audit process:¹

1. Documentation of self-audit;

¹ Some items in this Sample AAP are labeled "withheld from distribution or public inspection to protect confidentiality." A contractor would not include these items in copies of its Section 503 AAP that it makes available to applicants and employees (including managers), as they contain information that could identify specific employees with disabilities in violation of Section 503's confidentiality requirements. Such items should only be made available to OFCCP and to those employees responsible for the development and implementation of the AAP.

2. Summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs by job group relating to individuals with disabilities (withheld from distribution or public inspection to protect confidentiality); and
3. An applicant flow log showing the name, race, ethnicity, sex, disability status, date of application, job title, interview status and the action taken for all individuals applying for job opportunities (withheld from distribution or public inspection to protect confidentiality).

XI. Supporting Data

a. FCI Self-Audit (Conducted on 12/15/2014)

| SECTION 503 AAP Component | Requirements | Date last inspected for compliance and Results of Inspection (Compliant (C) / Not Compliant (NC)) | Follow-on or remedial actions |
|---|--|---|---|
| Invitation to self-identify at the pre-offer stage of employment process (41 CFR 60-741.42(a)(1) and (2)) | As of May 1, 2014, FCI invites applicants to self-identify as an individual with a disability pre-offer using the invitation form provided by OFCCP. | May 1, 2014; (C) | |
| Invitation to self-identify at the post-offer stage of employment process (41 CFR 60-741.42(b)(1) and (2)) | FCI invites applicants to self-identify as an individual with a disability post-offer using the invitation form provided by OFCCP. | December 1, 2014; (C) | |
| Employee invitation to self-identify (41 CFR 60-741.42(c)) | FCI sent an invitation to all employees to voluntarily self-identify as an individual with a disability on June 1, 2014 by e-mail. The email contained a link to the electronic self-id form, and also indicated to employees that paper self-id forms are available in FCI's human resources office. FCI will extend this invitation to self-identify to employees every five years thereafter. | December 1, 2014; (C) | Remind employees on May 1, 2017 that they may update their status at any time. Issue next invitation to self-identify on May 1, 2019. |
| Policy Statement (41 CFR 60-741.44(a)) | Policy Statement posted on bulletin boards. | December 1, 2014; (C) | |
| | Policy Statement made available, as needed, in a form that is accessible and understandable to individuals with disabilities. | December 1, 2014; (C) | |
| | Policy Statement contains required non-discrimination and non-retaliation statements. | December 1, 2014; (C) | |
| | Policy Statement indicates top executive support for AAP. | December 1, 2014; (C) | |
| Review of Personnel Processes (41 CFR 60-741.44(b)) | FCI conducts periodic review of personnel processes using procedures designed to facilitate this review. | December 1, 2014; (C) | |
| | FCI provides necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. | December 1, 2014; (C) | |

| SECTION 503 AAP Component | Requirements | Date last inspected for compliance and Results of Inspection (Compliant (C) / Not Compliant (NC)) | Follow-on or remedial actions |
|---|--|---|---|
| Physical and Mental Qualifications (41 CFR 60-741.44(c)) | FCI provides and adheres to a schedule for reviewing all physical and mental qualification standards in the AAP. | December 1, 2014; (C) | |
| | FCI demonstrates that, if a physical/mental qualification standard tends to screen out qualified individuals with disabilities, the standards are job-related and consistent with business necessity. | December 1, 2014; (C) | |
| Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-741.44(d)) | FCI provides reasonable accommodation to the known physical and mental limitations of otherwise qualified individuals with disabilities, absent undue hardship. | December 1, 2014; (NC) | During the audit, FCI discovered several requests for reasonable accommodation submitted during the AAP year that were not timely processed, without a reasonable explanation for the delay. FCI will review reasonable accommodation procedures and provide training to all managers and supervisors on the proper processing of accommodation requests. |
| | If employees with known disabilities experience performance difficulties that may be related to the disability, FCI confidentially informs the employee of the issue, asks if it is related to the disability and, if so, asks if the employee needs an accommodation. | December 1, 2014; (NC) | During the audit, FCI discovered that several new managers with supervisory responsibilities over employees with known disabilities were unaware of this affirmative duty. FCI will immediately provide refresher training to all managers and supervisors regarding this affirmative duty in January 2015. |
| Harassment (41 CFR 60-741.44(e)) | FCI has developed and implemented procedures to ensure employees are not harassed on the basis of disability and provided those procedures in the AAP. | December 1, 2014; (C) | |
| External dissemination of policy, outreach, and positive recruitment (41 CFR 60-741.44(f)) | FCI undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities. | December 1, 2014; (C) | |
| | FCI documents all outreach and recruitment activities and retains such documents for a period of three years. | Pending implementation | FCI will begin documenting all outreach and recruitment activities starting January 1, 2015. |

| SECTION 503 AAP Component | Requirements | Date last inspected for compliance and Results of Inspection (Compliant (C) / Not Compliant (NC)) | Follow-on or remedial actions |
|---|--|---|--|
| External dissemination of policy, outreach, and positive recruitment (41 CFR 60-741.44(f)) | FCI conducts an assessment of each outreach and recruitment activity, and an assessment of the effectiveness of the totality of these activities that meets these requirements: | Pending implementation | FCI will conduct first annual, overall outreach and recruitment assessment on December 1, 2015 |
| | <ol style="list-style-type: none"> 1. <i>FCI conducts an overall assessment <u>annually</u>;</i> | | |
| | <ol style="list-style-type: none"> 2. <i>FCI documents criteria it uses in its assessment, which includes data collected pursuant to 41 CFR 60-741.44(k) for current year and the two most recent previous years;</i> | | |
| | <ol style="list-style-type: none"> 3. <i>FCI evaluates <u>each</u> outreach and recruitment activity using the criteria set out and comes to a reasonable conclusion as to whether each activity is effective in identifying and recruiting qualified individuals with disabilities</i> | | |
| | <ol style="list-style-type: none"> 4. <i>FCI provides an assessment of its overall outreach and recruitment efforts and, if it concludes that these overall efforts are not effective, FCI identifies and implements alternative efforts; and</i> | | |
| | <ol style="list-style-type: none"> 5. <i>FCI documents these assessments and retains such documents for 3 years.</i> | | |
| Internal Dissemination of Policy (41 CFR 60-741.44(g)) | FCI includes its affirmative action policy in the policy manual or makes it otherwise available to employees. | December 1, 2014; (C) | |
| | FCI notifies union officials of its affirmative action policy. | December 1, 2014; (C) | |
| Audit and Reporting System (41 CFR 60-741.44(h)) | FCI has designed and implemented an audit and reporting system that: (a) measures the effectiveness of FCI's AAP, (b) indicates any need for remedial action, (c) determines whether FCI's affirmative action objectives have been reached, (d) determines whether known individuals with disabilities have had the opportunity to participate in all company sponsored educational, training, recreational and social activities, (e) and measures FCI's compliance with the AAP's specific objectives. | December 1, 2014; (C) | |

| SECTION 503 AAP Component | Requirements | Date last inspected for compliance and Results of Inspection (Compliant (C) / Not Compliant (NC)) | Follow-on or remedial actions |
|---|--|---|--|
| Audit and Reporting System (41 CFR 60-741.44(h)) (continued) | FCI documents the actions it takes to comply with audit and reporting system obligations and retains these documents as employment records (see § 60-741.80). | Pending Implementation | FCI will begin documenting all audit and reporting activities starting January 1, 2015 |
| | FCI undertakes necessary action to bring AAP into compliance if it finds any deficiencies. | December 1, 2014; (C) | |
| Responsibility for Implementation (41 CFR 60-741.44(i)) | FCI assigns an official the responsibility for implementation of its AAP activities whose identity appears on all internal and external communications regarding the AAP and is supported by senior management and staff to implement the AAP. | December 1, 2014; (C) | |
| Training (41 CFR 60-741.44(j)) | FCI trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the AAP are carried out. | December 1, 2014; (C) | |
| Data Collection Analysis (41 CFR 60-741.44(k)) | FCI documents the following computations or comparisons pertaining to applicants and hires on an <u>annual basis</u> and maintains them for a period of three years: <ol style="list-style-type: none"> 1. <i>The number of applicants who self-identified as individuals with disabilities at the pre-offer stage of FCI's employment process (§ 60-741.42(a));</i> 2. <i>The total number of job openings;</i> 3. <i>Total number of jobs filled;</i> 4. <i>The total number of applicants for all jobs;</i> 5. <i>The number of applicants with disabilities hired;</i> 6. <i>The total number of applicants hired.</i> | Pending implementation | FCI will begin collecting required data starting January 1, 2015. |
| Utilization goals (41 CFR 60-741.45) | FCI annually evaluates the representation of individuals with disabilities in each job group established for utilization analysis under EO 11246 with the 7% utilization goal. | Pending implementation | FCI will conduct its first full annual utilization analysis on December 1, 2015. |
| | FCI takes steps to determine if there are impediments to equal employment opportunity when the percentage of individuals with disabilities in the job group is less than the 7% utilization goal. | | |
| | FCI develops & executes action-oriented programs designed to correct any identified impediments or problem areas. | | |

b. Personnel Activity² [Withheld from distribution or public inspection to ensure confidentiality.]

| Category and Job Group Number | Hires | | Applicants | | Promotions – Into Job Group | | Terminations | | Layoffs | | Recalls | |
|---|-----------|----------|------------|-----------|-----------------------------|----------|--------------|----------|----------|----------|----------|----------|
| | Total | IWD | Total | IWD | Total | IWD | Total | IWD | Total | IWD | Total | IWD |
| Officials and Managers Job Group: 1 | 1 | 0 | 9 | 1 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Professionals Job Group: 2 | 2 | 0 | 24 | 3 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Technicians Job Group: 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sales Workers Job Group: 4 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Administrative Support Workers Job Group: 5 | 2 | 1 | 63 | 8 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Craft Workers Job Group: 6 | 9 | 1 | 92 | 12 | 2 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| Operatives Job Group: 7 | 2 | 0 | 34 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Laborers and Helpers Job Group: 8 | 1 | 0 | 28 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 |
| Service Workers Job Group: 9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Overall activity | 17 | 2 | 250 | 25 | 5 | 0 | 6 | 0 | 0 | 0 | 0 | 0 |

c. Applicant Flow Logs [Withheld from distribution or public inspection to ensure confidentiality.]

| Name | Referral Source | Race/Ethnicity | Sex | Disability (Y/N) | Date of Application | Job Title | Interview (Y/N) | Action Taken (H/NH) ³ | Date Action Taken |
|------|-----------------|----------------|-----|------------------|---------------------|-----------|-----------------|----------------------------------|-------------------|
| | | | | | | | | | |

² FCI revised its audit procedures to include summary data of personnel activities involving Individuals with Disabilities, and such revisions were implemented on June 1, 2014. Data pertaining to IWDs in this chart is incomplete, and FCI expects to have more complete data in its next AAP update.

³ H = Hired; NH = Not Hired

XII. Responsibility for Implementation of AAP [41 CFR 60-741.44(i)]

The Director of Human Resources has been designated to direct the activities of the affirmative action program. The Director has the full support of the Chief Executive Officer and has the responsibility for designing and ensuring the effective implementation of FCI's AAP. These responsibilities include, but are not limited to:

1. The development of the AAP for individuals with disabilities, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with FCI's affirmative action obligations;
3. Reviewing the qualifications of all applicants and employees considered/eligible for hiring, promotion, transfer, or layoff/reduction in force to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur;
4. Developing solutions for any identified problem areas;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
6. Keeping the CEO informed of equal opportunity progress and problems within the company through quarterly reports;
7. Providing department-level managers with copies of the AAP (minus the items withheld from dissemination for confidentiality reasons) and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for individuals with disabilities with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Assisting in ensuring that career development of employees with disabilities is equal to that of other employees;
10. Auditing the contents of company bulletin boards to ensure that required information is posted and up-to-date;
11. Serving as a liaison between FCI and enforcement agencies; and
12. Serving as a liaison between FCI and outreach and recruitment sources for individuals with disabilities.

XIII. EEO and Affirmative Action Training [41 CFR 60-741.44(j)]

Managers, supervisors, and human resources staff involved in recruiting, screening, selection, promotion, disciplinary, and other related employment processes receive annual training regarding FCI's AAP and their role in its implementation. Training sessions were most recently conducted on December 1, 2014.

During the annual training, managers and supervisors are advised of their responsibilities under FCI's AAP for individuals with disabilities and of their obligations to:

- Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
- Ensure qualified applicants and employees with disabilities are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training or to receive awards or bonuses;
- Provide reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any disability-related information obtained regarding any applicant or employee; and
- Ensure that nondiscrimination is adhered to in all personnel activities.

XIV. Applicant and Hiring Data [41 CFR 60-741.44(k)]

[Withheld from distribution or public inspection to ensure confidentiality.]

FCI collects employee data pertaining to individuals with disabilities in order to assess the effectiveness of the company's outreach and recruitment efforts. FCI invites applicants and employees to voluntarily inform the company whether they believe they are individuals with disabilities in compliance with the Section 503 requirements.

| | 2014 | 2015 | 2016 |
|---|-----------------|------|------|
| Number of applicants who self-identify as individuals with disabilities before an offer of employment is made | 25 ⁴ | | |
| Total number of job openings | 17 | | |
| Total number of jobs filled | 17 | | |
| Total number of applicants for all jobs | 250 | | |
| Number of applicants with disabilities hired | 2 | | |
| Total number of applicants hired | 17 | | |

⁴ FCI began inviting applicants to self-identify as IWDs prior to an offer of employment on June 1, 2014. Therefore, FCI only has partial-year data for this data element for 2014.

XV. Utilization Analysis [41 CFR 60-741.45(d)]

a. Job Groups [41 C.F.R. § 60-741.45(d)(2)]⁵

| Job Titles | Job Group Name | EEO-1 Category |
|--|----------------|--------------------------------|
| General Manager Controller Pricing – Billing Manager Sales – Customer Support Manager Interior Design Manager Personnel Manager Installation Manager Installation Supervisor Repair Supervisor | 1 | Officials and Managers |
| Interior Designer Office Space Planner General Ledger Accountant Payroll Administrator Purchasing Agent Pricing Specialist | 2 | Professionals |
| No FCI employees in Job Group 3 | 3 | Technicians |
| Office Equipment Sales Representative | 4 | Sales Workers |
| Executive Assistant Administrative Assistant File Clerk Billing Clerk Inventory Control Clerk Customer Information Sales Representative Call Center Agent Customer Service Complaints Clerk | 5 | Administrative Support Workers |
| Systems – Specialist Installer Furniture Repair | 6 | Craft Workers |
| Truck Driver Forklift Operator | 7 | Operatives |
| Installer Helper Receiving | 8 | Laborers and Helpers |
| No FCI Employees in Job Group 9 | 9 | Service Workers |

⁵ For utilization analysis under 41 CFR 60-741.45, a company is required to use the same job groups established for its Executive Order 11246 AAP if it has more than 100 employees.

b. Utilization of Individuals with Disabilities⁶

| Job Group | Total Number of Employees per Job Group | # of Employees who are individuals with disabilities per Job Group | Utilization rate of individuals with disabilities per Job Group | Underutilized? (Y/N) |
|------------------|--|---|--|-----------------------------|
| 1 | 9 | 0 | 0.0% | Y |
| 2 | 22 | 2 | 9.1% | N |
| 4 | 10 | 1 | 10.0% | N |
| 5 | 30 | 3 | 10.0% | N |
| 6 | 43 | 3 | 7.0% | N |
| 7 | 10 | 0 | 0.0% | Y |
| 8 | 16 | 1 | 6.3% | Y |

⁶ If the number of employees in one or more of a contractor's job groups is so small that the identity of an employee with a disability would be readily discernable, the data for that job group(s) should be omitted from any copies of the AAP disseminated or made available for public inspection, so as to ensure confidentiality.

c. **Identification of Problem Areas and Action-oriented Programs⁷ [41 CFR 60-741.45(e) and (f)]**

| Job Groups where Utilization Goal is Not Met | Identification of Problem Areas (if any) | Action-oriented Programs |
|---|---|---------------------------------|
| 1 | None identified | |
| 7 | None identified | |
| 8 | None identified | |

⁷ FCI's review of its internal audit, including review of the company's personnel processes and job qualification standards did not reveal any impediments to equal employment opportunity for these job groups. However, FCI recognizes that this review was based on incomplete data, as FCI is in the midst of its transition to compliance with the revised Section 503 AAP requirements. FCI's next AAP will include a more thorough and complete assessment of problem areas for any job group where the 7% goal is not met.