

U.S. Department of Labor

Office of Federal Contract Compliance Programs
New Jersey District Office
200 Sheffield Street, Room 102
Mountainside, NJ 07092



Conciliation Agreement
Between the
U.S. Department of Labor
Office of Federal Contract Compliance Programs
and
CRYSTAL LAKE HEALTHCARE & REHABILITATION
395 Lakeside Blvd.
Bayville, NJ 08721

PART I. PRELIMINARY STATEMENT

The Office of Federal Contract Compliance Programs ("OFCCP") evaluated the Crystal Lake Healthcare & Rehabilitation (hereinafter "Crystal Lake") establishment located at 395 Lakeside Boulevard, Bayville, NJ 08721-2807, beginning on December 17, 2018. OFCCP found that Contractor failed to comply with Executive Order 11246, as amended ("E.O. 11246"); Section 503 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 793 ("Section 503"), and Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. § 4212 ("VEVRAA"), and their implementing regulations at 41 C.F.R. Sections 60-1 through 60-3, 60-250, 60-300, and 60-741. OFCCP notified Crystal Lake of the specific violations and the corrective actions required in a Notice of Violation issued on August 1, 2019 ("NOV"). In the interest of resolving the violations without engaging in further legal proceedings and in exchange for the good and valuable consideration described in this document, OFCCP and Crystal Lake enter this Conciliation Agreement (the "Agreement") and agree to all the terms stated below.

PART II. GENERAL TERMS AND CONDITIONS

1. In exchange for Crystal Lake's fulfillment of all obligations in Parts III and IV of the Agreement, OFCCP agrees not to institute administrative or judicial enforcement proceedings under E.O. 11246, Section 503, and VEVRAA based on the violations described in more detail in Part III below. However, OFCCP has the right to initiate legal proceedings to enforce the Agreement itself or to correct and obtain relief for the violations described in Part III if Crystal Lake violates this Agreement. Nothing in this Agreement precludes OFCCP from initiating enforcement proceedings based on future compliance evaluations or complaint investigations.
2. Crystal Lake agrees that OFCCP may review its compliance with this Agreement. As part of such review, OFCCP may require written reports, inspect the premises, interview witnesses, and examine and copy documents. Crystal Lake will permit access to its premises during normal business hours for these purposes and will provide OFCCP with all reports and documents requested.

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3. Crystal Lake understands that nothing in this Agreement relieves it of its obligation to fully comply with the requirements of E.O. 11246, Section 503, VEVRAA, their implementing regulations, and other applicable equal employment laws.
4. Crystal Lake promises not to harass, intimidate, threaten, discriminate, or otherwise retaliate against any individual because the individual: benefits from this Agreement, files a complaint or participates in any investigation or proceeding under E.O. 11246, Section 503, and/or VEVRAA, or engages in any activity listed at 41 C.F.R. § 60-1.32(a).
5. The parties understand the terms of this Agreement and enter into it voluntarily.
6. This document and its attachments contain the complete and final understanding of the parties with respect to the matters referenced herein. This Agreement contains all terms by which the parties are bound and it supersedes all prior written or oral negotiations and agreements. There will be no modifications or amendments to this Agreement unless they are in writing, signed by all parties.
7. If one or more provisions of this Agreement are rendered unlawful or unenforceable, the remaining provisions will remain in full force and effect.
8. This Agreement becomes effective on the day it is signed by the District Director of the New Jersey District Office (the "Effective Date").
9. This Agreement will expire sixty (60) days after Crystal Lake submits the final progress report required in Part IV below, unless OFCCP notifies Crystal Lake in writing prior to the expiration date that Crystal Lake has not fulfilled all of its obligations under the Agreement, in which case the Agreement is automatically extended until the date that OFCCP determine Crystal Lake has met all of its obligations under the Agreement.
10. If Crystal Lake violates this Conciliation Agreement,
 - A. The procedures set forth at 41 C.F.R. § 60-1.34 will govern:
 - 1) If OFCCP believes that Crystal Lake violated any term of the Agreement while it was in effect, OFCCP will send Crystal Lake a written notice stating the alleged violations and summarizing any supporting evidence.
 - 2) Crystal Lake will have 15 days from receipt of such notice to demonstrate in writing that it has not violated the Conciliation Agreement, unless such a delay would result in irreparable injury to the employment rights of affected employees or applicants.
 - 3) If Crystal Lake is unable to demonstrate that it has not violated the Agreement, or if OFCCP alleges irreparable injury, enforcement proceedings may be initiated immediately without issuing a show cause notice or proceeding through any other requirement.

4) OFCCP may seek enforcement of this Agreement itself and is not required to present proof of any underlying violations resolved by this Agreement.

B. Crystal Lake may be subject to the sanctions set forth in Section 209 of the Executive Order, 41 C.F.R. § 60-741.66, 41 C.F.R. § 60-250.66, or 41 C.F.R. § 60-300.66 and/or other appropriate relief for violation of this Agreement.

11. This Agreement does not constitute an admission by Crystal Lake of any violation of E.O. 11246, Section 503, VEVRAA, or other laws, nor has there been an adjudicated finding that Crystal Lake violated any laws.

PART III. SPECIFIC VIOLATIONS AND REMEDIES

1. **VIOLATION:** During the period of January 1, 2017 to June 30, 2018, Crystal Lake failed to implement an applicant tracking system for hires in accordance with the requirements at 41 CFR 60-3.4 and 41 CFR 60-3.15. Specifically, Crystal Lake failed to collect race and gender information on applicants whom Crystal Lake did not hire.

REMEDY: Crystal Lake will implement an updated and refined applicant tracking system for hires that will allow Crystal Lake to analyze its pool of applicants for: a) Affirmative action purposes to monitor whether the process is yielding an adequate pool of qualified minority and female applicants; and b) Nondiscrimination purposes to monitor for disparate treatment or unlawful adverse impact in the selection process.

2. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to collect and maintain personnel and employment records and conduct adverse impact analyses in accordance with the requirements at 41 CFR 60-1.12(a) and Part 60-3. Specifically, Crystal Lake failed to document and maintain accurate records pertaining to the hiring process, such as applications, resumes, interview notes, and, where possible, the gender, race or ethnicity of applicants for employment for the appropriate period.

REMEDY: Effective immediately, Crystal Lake will ensure that its records are collected and maintained in accordance with the requirements at 41 CFR 60-1.12(a) and Part 60-3. Crystal Lake will conduct adverse impact analyses on at least an annual basis for the purpose of determining whether adverse impact exists against applicants based on race, sex, or ethnic group in hiring, promotion, termination, and other personnel activities. These analyses will be done by job for each group constituting more than 2% of the labor force in the relevant labor area or 2% of the applicable workforce. If adverse impact is identified in the total selection process, Crystal Lake will evaluate each individual component of the selection process for adverse impact. If adverse impact is found to exist in any of the individual components of the selection process, Crystal Lake will validate each such component in accordance with the Uniform Guidelines on Employee Selection Procedures or utilize selection procedures, which do not result in adverse impact.

3. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to perform an effective in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity exist in accordance with the regulations at 41 CFR 60-2.17(b). Specifically, Crystal Lake failed to evaluate personnel activity to determine whether impediments to equal employment opportunity exist in the selection process.

REMEDY: Effective immediately Crystal Lake will perform in-depth analyses of its total employment process to determine whether and where impediments to equal employment opportunity exist in accordance with the requirements at 41 CFR 60-2.17. Crystal Lake will evaluate personnel activity; specifically applicant flow, hires, terminations, promotions, and other personnel actions to determine whether there are selection disparities.

4. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to form an acceptable job group analysis in accordance with the regulations at 41 CFR 60-2.12(b). Specifically, Crystal Lake failed to ensure that all jobs in its job groups were of similar content, wage rates, and opportunities in the job group analysis.

REMEDY: Effective immediately, Crystal Lake will perform a job group analysis that is in accordance with the requirements at 41 CFR 60-2.12(b). Crystal Lake will perform a job group analysis that combines jobs at its establishment with similar content, wage rates, and opportunities. Similarity of content refers to the duties and responsibilities of the job titles, which make up the job group. Similarity of opportunities refers to training, transfers, promotions, pay, mobility, and other career enhancement opportunities offered by the jobs within the job group.

5. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to properly determine availability in accordance with the regulations at 41 CFR 60-2.14. Specifically, Crystal Lake failed to conduct an availability analysis, which reflects a benchmark against which the demographic composition of the contractor's incumbent workforce can be compared in order to determine whether barriers to equal employment opportunity may exist within particular job groups.

REMEDY: Effective immediately Crystal Lake will determine availability in accordance with the regulations at 41 CFR 60-2-14. Crystal Lake will evaluate its workforce by job groups to determine whether there are any problems of minority or female utilization.

6. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to develop and implement auditing systems that periodically measure the effectiveness of its total AAPs in accordance with the regulations at 41 CFR 60-2.17(d). Specifically, Crystal Lake failed to monitor records of all personnel activity, failed to require internal reporting on a scheduled basis, failed to review and report

results with all levels of management, and failed to advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

REMEDY: Effective immediately Crystal Lake will develop and implement an effective internal audit and reporting systems that periodically measure the effectiveness of its total AAPs, as required by 41 CFR 60-2.17(d)(1) through (4). The internal audit and reporting system will include the following:

- a. Monitoring records of personnel activity including compensation, at all levels to ensure that its nondiscriminatory policy is carried out;
 - b. Requiring internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
 - c. Reviewing report results with all levels of management; and
 - d. Advising top management of program effectiveness and submitting recommendations, including specific steps and concrete strategies, to improve unsatisfactory performance.
7. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to immediately list all employment openings with either the state workforce agency job bank or a local employment service delivery system serving the location where the openings occurred in violation of 41 CFR 60-300.5(a)2-6.

REMEDY: Effective immediately Crystal Lake will list all employment openings as they occur with an appropriate employment service delivery system (ESDS) (either the state workforce agency job bank or a local ESDS) where the openings occur, in a manner and format that will allow the ESDS to provide priority referrals of protected veterans to Crystal Lake, as required by 41 CFR 60-300.5(a)2-6. With its initial listing, and as subsequently needed to update the information, Crystal Lake will also advise the employment service delivery system that it is a federal contractor that desires priority referrals of protected veterans for job openings at all locations within the state, and provide the employment service delivery system with the name and address of each of its hiring locations within the state and the contact information for the contractor official responsible for hiring at each location, in accordance with 41 CFR 60-300.5(a)4. Should any of the information in the disclosures change since it was last reported to the ESDS, Crystal Lake shall provide updated information simultaneously with its next job listing.

8. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to undertake appropriate outreach and positive recruitment activities that were reasonably designed to effectively recruit qualified protected veterans, document these activities, assess their effectiveness, and document its review, in

violation of 41 CFR 60-300.44(f). Specifically, Crystal Lake indicated that no outreach and recruitment of qualified protected veterans had been taken.

REMEDY: Effective immediately Crystal Lake will undertake appropriate external outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified protected veterans, such as those described at 41 CFR 60-300.44(f)(2). Examples of additional types of outreach and positive recruitment activities include, but are not limited to:

- Entering into formal, written relationships with organizations to accomplish specified objectives, such as training, translating military experience, and/or referring job applicants with work experience or job skills that match or are related to existing and anticipated job vacancies;
- Working with the veterans' counselors and coordinators (or "Vet Reps") at local colleges and universities to identify qualified temporary and permanent job candidates;
- Working with the Local Veterans' Employment Representative (LVER) in the American Job Center nearest to the contractor to identify qualified permanent job candidates. See the following link: <http://www.careeronestop.org/businesscenter/recruitandhire/hiringadiverseworkforce/veterans.aspx>;
- Participating in job fairs targeting veterans;
- Using the national Veterans Employment Center (VEC) to search verified profiles of veteran job candidates and post job opportunities. See <https://www.vets.gov/veterans-employment-center>; and
- Using local veteran service organizations or other resources identified by the contractor's existing Employee Resource Group (ERG) on veterans to recruit qualified temporary and permanent job candidates.

Additional examples are in the text of the regulations.

Crystal Lake will annually review its outreach and recruitment activities, assess their effectiveness, and document this review, in accordance with 41 CFR 60-300.44(f) (3). Crystal Lake will document all activities it undertakes to comply with this section, in accordance with 41 CFR 60-300.44(f) (4).

9. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to invite applicants to inform it whether the applicant believes that he or she is a veteran protected by VEVRAA in violation of 41 CFR 60–300.42.

REMEDY: Effective immediately Crystal Lake will invite applicants to inform it whether the applicant believes that he or she is a veteran protected by VEVRAA, as required by 41 CFR 60–300.42.

More specifically, Crystal Lake will invite applicants for employment, prior to an offer of employment, to voluntarily identify as a protected veteran. Additionally, Crystal Lake will invite applicants for employment, after an offer of employment but before applicants begin their job duties, to voluntarily inform it whether the applicant believes that he or she is a protected veteran. Crystal Lake may invite the applicant to also indicate if he or she belongs to one or more of the specific categories of protected veterans, as defined by 41 CFR 60–300.2(q). All invitations to self-identify as a protected veteran will comply with the requirements of 41 CFR 60–300.42(c). Crystal Lake will keep all self-identification information confidential and maintain it in a separate data analysis file, rather than in its personnel or medical files, in accordance with 41 CFR 60–300.42(e).

10. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to document and maintain the required data pertaining to applicants and hires, in violation of 41 CFR 60–300.44(k). Specifically, Crystal Lake failed to document and maintain any of the required information with regards to data collection for analysis of applicants who self-identified as protected veterans.

REMEDY: Effective immediately Crystal Lake will document the following computations or comparisons pertaining to applicants and hires, on an annual basis, and will maintain this data for three (3) years, as required by 41 CFR 60–300.44(k):

- The number of applicants who self-identified as protected veterans, or who are otherwise known to be protected veterans;
- The total number of job openings and total number of jobs filled;
- The total number of applicants for all jobs;
- The number of protected veteran applicants hired; and
- The total number of applicants hired.

11. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to undertake appropriate outreach and positive recruitment activities that were reasonably designed to effectively recruit qualified individuals with disabilities, document these activities, assess their effectiveness, and document its review, in violation of 41 CFR 60-741.44(f). Specifically, Crystal Lake indicated that no outreach and recruitment of qualified individuals had been undertaken.

REMEDY: Effective immediately Crystal Lake will undertake appropriate outreach and positive recruitment activities designed to recruit qualified individuals with

disabilities, such as those described at 41 CFR 60–741.44(f)(2). Examples of additional types of outreach and positive recruitment activities include, but are not limited to:

- Entering into formal, written relationships with organizations to accomplish specified objectives, such as training, and/or referring job applicants with work experience or job skills that match or are related to existing and anticipated job vacancies;
- Creating internship programs for students with disabilities from local colleges and universities;
- Using the Workforce Recruitment Program (WRP) for students and graduates with disabilities to identify qualified temporary and permanent job candidates. See <http://wrp.jobs/employers/>;
- Participating in job fairs targeting qualified individuals with disabilities; and
- Using local disability service organizations or other resources identified by the contractor's existing Employee Resource Group (ERG) on disability to recruit qualified temporary and permanent job candidates.

Additional examples are in the text of the regulations.

Crystal Lake will annually review its outreach and recruitment activities, assess their effectiveness, and document this review, in accordance with 41 CFR 60-741.44(f) (3). Crystal Lake will document all activities it undertakes to comply with this section, in accordance with 41 CFR 60-741.44(f) (4).

12. **VIOLATION:** During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to invite its employees and applicants for employment to voluntarily self-identify as an individual with a disability, using the OMB-approved form for this purpose, in violation of 41 CFR 60–741.42. Specifically, Crystal Lake failed to invite to self-identify at the pre-offer stage.

REMEDY: Effective immediately Crystal Lake will invite both its applicants for employment, and its employees, to voluntarily self-identify as an individual with a disability, in accordance with 41 CFR 60–741.42. All invitations to self-identify will be made using the OMB-approved form for this purpose (available on the OFCCP website).

More specifically, Crystal Lake will invite each of its applicants for employment, prior to an offer of employment, to voluntarily inform it whether the applicant believes that he or she is an individual with a disability, as that term is defined in 41 CFR 60–741.2(g)(1)(i) or (ii). Crystal Lake will also invite each of its applicants for employment, after an offer of employment has been made and before the applicant begins work, to voluntarily inform it whether the applicant believes that he or she is an individual with a disability. In addition, during the first year it is subject to this requirement, Crystal Lake will invite each of its employees to voluntarily self-identify as an individual with a disability, and then extend this invitation again at five year intervals, thereafter. At least once during each interval, Crystal Lake will remind

its employees that they may voluntarily update their disability-related self-identification information at any time. Crystal Lake will keep all self-identification information confidential and maintain it in a separate data analysis file, rather than in its personnel or medical files, in accordance with 41 CFR 60-741.42(e).

13. **VIOLATION**: During the period of January 1, 2017 through June 30, 2018, Crystal Lake failed to document and maintain the required data pertaining to applicants and hires, in violation of 41 CFR 60-741.44(k). Specifically, Crystal Lake failed to invite applicants to self-identify as an individual with a disability. Due to Crystal Lake's failure to consistently collect the Section 503 self-identification form data, Crystal Lake was unable to collect and retain the required data under 41 CFR 741.44(k). Specifically, Crystal Lake failed to document and maintain any of the required information with regards to data collection for analysis for applicants who self-identified as an individual with disability.

REMEDY: Effective immediately Crystal Lake will document the following computations or comparisons pertaining to applicants and hires, on an annual basis, and will maintain this data for three (3) years, as required by 41 CFR 60-741.44(k):

- The number of applicants who self-identified as individuals with disabilities, or who are otherwise known to be individuals with disabilities;
- The total number of job openings and total number of jobs filled;
- The total number of applicants for all jobs;
- The number of applicants with disabilities hired; and
- The total number of applicants hired.

Part IV. REPORTS REQUIRED

Crystal Lake must submit the documents and reports described below to Joanne Karayiannidis, New Jersey District Director, 200 Sheffield Street, Suite 102, Mountainside, NJ 07092.

Within the prescribed timeframes, Crystal Lake must submit all documents and information referenced in section IV.

- A. The first progress report shall be due seven months after the Effective Date of this Agreement and must cover the six-month period beginning with the Effective Date. Each subsequent report must cover the successive six-month period, and must be submitted within 30 calendar days after the close of that six-month period:

1. Narrative discussion of the implementation of Crystal Lake's applicant tracking system, to include a description of the system and the training on the system. Additionally, provide the below data. (Violation 1 and Violation 2)
 - a. The total number of applicants and hires for each job or job group during the reporting period;

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- b. For each job or job group, the breakdown by applicable race, gender and ethnic group of applicants and hires;
 - c. For each job or job group, the results of Crystal Lake's analysis as to whether its total selection process has adverse impact as defined in 41 CFR 60-3.4D on those members of groups set forth in subparagraph b, above;
 - d. For each job or job group, the qualifications that Crystal Lake used, if any, and the stage at which Crystal Lake used the qualification(s), as a screening device;
 - e. For each case where the total selection process has an adverse impact, as defined in 41 CFR 60-3.4D, the results of Crystal Lake's evaluation of the individual components of the selection process for adverse impact; and
 - f. The actions taken by Crystal Lake, where action is appropriate, after determining that any component of the selection process has an adverse impact on members of groups set forth in subparagraph b, above.
2. Narrative discussion of the implementation of Crystal Lake's VEVRAA self-identification procedures. This narrative should include how Crystal Lake conducted or plans to conduct the issuance of VEVRAA self-identification forms. (Violation 9)
 3. A copy of Crystal Lake's VEVRAA self-identification form issued pre- and post-offer. (Violation 9)
 4. A narrative discussion of the implementation of Crystal Lake's Section 503 self-identification procedures. This narrative should include how Crystal Lake conducted or plans to conduct the issuance of Section 503 self-identification forms and a copy of the OMB approved self-identification form issued pre- and post-offer. Also, indicate the last time a canvass of all employees was conducted as required under Section 503. (Violation 12)
- B. The second report shall be due on 10/31/2020 and shall consist of the following covering the period from the Effective Date of this Agreement to 09/30/2020:
- A listing of all applicants and hires for each job opening, during the reporting period. (Violations 1, 9 and 12)
- a. Applicant name or ID;
 - b. Race/Ethnicity;
 - c. Gender;
 - d. Date of application;

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- e. Job group applied to;
- f. Job title applied for;
- g. Job group hired into;
- h. Job title hired into;
- i. Veteran status;
- j. Disability status; and
- k. Disposition for those not selected for hire.

Within 15 days of receipt of the second progress report OFCCP will send Crystal Lake a list of 30 randomly selected names. Crystal Lake will have 15 days to resubmit the applications and self-identification forms.

- C. The third report shall be due on 04/30/2021 covering the period of 10/01/2020 through 03/31/2021. The report shall consist the following items:
1. Copy of Crystal Lake's E.O. 11246 identification of Problem Areas section of the Current AAP as of the due date. Crystal Lake's Utilization Analysis: Include the formation of percentages of minorities and the percentage of women employed in each job group (Violation 3)
 2. Crystal Lake's Job Group Analysis (covering all jobs) prepared in accordance with 41 CFR 60-2.12. (Violation 4)
 3. Crystal Lake's Availability Analysis: Determine availability using two factors: a) The percentage of minorities and women in the reasonable recruitment area and b) the percentage among those promotable, transferable and trainable within your company; pursuant to 41 CFR 60-2.14. Include documentation of Crystal Lake's placement goals for each job group in which the percentage of minorities or women employed is less than would be reasonably expected given their availability; pursuant to 41 CFR 60-2.16. (Violation 5)
 4. Crystal Lake's E.O. 11246 Internal Audit and Reporting narrative from its Current AAP as of the due date. The narrative should include the results for items a-d below (Violation 6):
 - a. Monitor records of all applicants and self-identification process at all levels to ensure the nondiscriminatory policy is carried out;
 - b. Require internal reporting on a scheduled bases by measuring Crystal Lake's compliance with its voluntary self-identification procedures and applicant tracking including the degree to which equal employment opportunity and Crystal Lake's objectives have been attained;
 - c. Review report results with all levels of management; and
 - d. Advise top management of program effectiveness and indicate any need for remedial action and submit recommendations to improve unsatisfactory performance.

5. Documentation of Crystal Lake's listing of all job openings, as defined by 41 CFR 60-300.5(a) 2 through 6, with the local New Jersey One-Stop Career Center office where the openings occur; along with a report on the number of referrals/responses and the number of hires, and to the extent known, the number of Vietnam Era and other veterans covered under OFCCP's regulations. (Violation 7)
6. Documentation showing Crystal Lake's outreach and recruitment efforts, targeting individuals with disabilities and veterans. Crystal Lake must provide a list of all disability and veteran outreach and recruitment activities, including but not limited to copies of letters, memos, record of telephone calls, and other documents generated in the normal course of business between Crystal Lake and any disability/veteran recruitment sources, including the organization listed in Part III under Violation 8 and Violation 11. For each outreach effort or activity, Crystal Lake must provide a description of the results and effectiveness of that effort or activity.
7. Documentation of Crystal Lake's computations or comparisons pertaining to applicants and hires as required by 41 CFR 60-300.44(k) (Violation 10):
 - a. The number of applicants who self-identified as protected veterans, or who are otherwise known to be protected veterans;
 - b. The total number of job openings and total number of jobs filled;
 - c. The total number of applicants for all jobs;
 - d. The number of protected veteran applicants hired; and
 - e. The total number of applicants hired.
8. Documentation of Crystal Lake's computations or comparisons pertaining to applicants and hires as required by 41 CFR 60-741.44(k) (Violation 13):
 - a. The number of applicants who self-identified as protected veterans, or who are otherwise known to be individuals with a disability;
 - b. The total number of job openings and total number of jobs filled;
 - c. The total number of applicants for all jobs;
 - d. The number of protected veteran applicants hired; and
 - e. The total number of applicants for all jobs.

Crystal Lake will retain all records and data pertinent to the violations resolved by this Agreement and/ or used to prepare required reports until this Agreement expires or as long as required by OFCCP's regulations, whichever date occurs later (or "whichever time period is longer").

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Part V. SIGNATURES

This Agreement is hereby executed by and between the OFCCP and Crystal Lake Healthcare & Rehabilitation, 395 Lakeside Boulevard, Bayville, NJ 08721-2807.

(b) (6), (b) (7)(C)

Steven Pick
Administrator
Crystal Lake Healthcare & Rehabilitation
Bayville, NJ

Date: 9/20/19

(b) (6), (b) (7)(E)

(b) (6), (b) (7)(E)
Compliance Officer
New Jersey District Office
OFCCP – Northeast Region

Date: 10/15/2019

(b) (6), (b) (7)(C)

Kevin Kollgaard
Assistant District Director
New Jersey District Office
OFCCP – Northeast Region

Date: 10/15/19

(b) (6), (b) (7)(C)

Joanne Karayiannidis
District Director
New Jersey District Office
OFCCP – Northeast Region

Date: 10/15/2019