

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

FOR VEVRAA

(FOR EDUCATIONAL AND INFORMATIONAL PURPOSES ONLY)

FEDERAL CONTRACTOR, INC. (FCI)
AFFIRMATIVE ACTION PROGRAM (AAP)
FOR PROTECTED VETERANS

(January 1, 2015 to December 31, 2015)

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II. Policy Statement on Equal Employment Opportunity for Protected Veterans [41 C.F.R. § 60-300.44(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 protected veterans. Therefore, it is the policy of FCI not to discriminate because of protected veteran status and to take affirmative action to employ and advance in employment qualified protected veterans 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 status as a protected veteran. FCI will also provide qualified applicants and employees who are disabled veterans 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 because they are protected veterans and will conduct training to try to prevent any harassment or discrimination before it occurs. FCI also prohibits retaliation 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 or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for protected veterans. 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 protected veterans 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 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 60-300.44(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 protected veterans. 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. In conducting this review, FCI uses the procedures suggested in Appendix C to 41 C.F.R. § 60-300.

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 disabled veterans 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 a protected veteran before an offer of employment is made.

On May 1, 2014, FCI began inviting all applicants to voluntarily inform FCI that they are protected veterans before an offer of employment is made, in compliance with 41 CFR 60-300.42(a) in the manner prescribed by OFCCP. FCI will also continue to invite applicants to self-identify as protected veterans post-offer in compliance with 41 CFR 60-300.42(b). FCI provides the self-id form it created using the model in Appendix B of 41 CFR 60-300 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 self-id form. FCI also created a separate electronic file where it stores all self-id information separate from employment applications, personnel records, and employee medical files.

3. Modify applicant flow logs.

FCI recognizes that it must collect applicant and hiring data to comply with the requirements of 41 CFR 60-300.44(k). In order to facilitate the accurate tracking of applicant and hiring data for protected veterans, FCI has modified its applicant flow logs accordingly. (*See Part XI. A.*) Applicant flow logs will be maintained confidentially.

4. Documentation and Assessment of Outreach and Recruitment Activities

FCI has always engaged in positive outreach and recruitment for protected veterans as required by OFCCP regulations. FCI has begun documenting each outreach and recruitment activity to comply with the requirements of the new VEVRAA 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 60-300.44(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 60-300.44(k), to see if it is producing measurable results:

1. To what extent did the activity attract qualified protected veterans?
2. To what extent did the activity result in the hiring of qualified protected veterans?
3. To what extent did the activity expand FCI's outreach to protected veterans in the community?
4. To what extent did the activity increase FCI's capacity/capability to include protected veterans 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 protected veterans, 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 60-300.44(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 disabled veterans, 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 disabled veterans. 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 and safety.

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 conduct a medical examination, FCI affirms that such inquiries or exams will be conducted in accordance with the VEVRAA regulations and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the VEVRAA regulations. The results of the examination or inquiry will only be used in accordance with the VEVRAA regulations.

V. Reasonable Accommodation [41 CFR 60-300.44(d)]

FCI will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified disabled veterans 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 VEVRAA 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 accommodations procedures using the guidance in Appendix B of the Section 503 disability regulations at 41 CFR Part 60-741.

VI. Anti-Harassment Procedures [41 CFR 60-300.44(e)]

Employees and applicants of FCI will not be subject to harassment because of protected veteran status. Any employee or applicant who believes that they have been subject to harassment because of their status as a protected veteran 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 protected veterans is prohibited. Any employee or applicant who believes that they have 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 protected veteran status 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 60-300.44(f)]

FCI provided written notification of FCI's Equal Employment Opportunity and Affirmative Action policy regarding the employment of protected veterans 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, local employment service delivery systems, educational institutions and social service agencies, of the company's policy concerning the employment of qualified protected veterans 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.

A copy of FCI's Affirmative Action Policy for qualified protected veterans is provided to the State Employment Service annually.

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

VIII. Outreach and Positive Recruitment [41 CFR 60-300.44(f)]

a. FCI's Outreach and Positive Recruitment Activities

Outreach/Recruitment Activity	Date of Activity	Description	Evaluation of Each Activity
Listed job openings with local veteran advocacy group	Ongoing	In addition to listing openings with local Employment Service Delivery System (ESDS) as required by the VEVRAA regulations, openings are also listed with a local veteran advocacy group	
Briefing of Vet-Reps at local community college campus	July 15, 2014	Briefed Vet-Reps regarding FCI's services and current hiring needs. FCI will begin sending job listings to Vet-Reps for assistance in attracting veteran applicants.	
Participated in Veteran Job Fair	November 13, 2014	Veteran Job Fair was hosted by local veterans' groups, and over 30 employers participated.	
Assessment of Effectiveness of Totality of Outreach/Recruitment Efforts:			
Criteria for Evaluation: <ol style="list-style-type: none"> 1. To what extent did the activity attract qualified applicants who are protected veterans? 2. To what extent did the activity result in the hiring of qualified protected veterans? 3. To what extent did the activity expand FCI's outreach to protected veterans in the community? 4. To what extent did the activity increase FCI's capacity/capability to include protected veterans in its applicant pool and workforce? 			

b. Future Assessment of External Outreach and Recruitment Efforts [41 CFR 60-300.44(f)(3)]

FCI will begin assessing its outreach and recruitment efforts annually 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 an assessment of the effectiveness of the totality of our efforts for the year. Because FCI currently has limited applicant and hiring data for protected veterans,

which it began collecting last 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 protected veterans into our 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 60-300.44(f)(4).

c. Future Outreach and Positive Recruitment Activities

FCI plans to expand its outreach and positive recruitment efforts in 2015. FCI will routinely post its job vacancy announcements to veteran job boards hosted by the Departments of Veterans Affairs and Defense (the Veterans Employment Center), the Paralyzed Veterans of America (Paving Access to Veterans' Employment), and other similar public and private veteran-focused job banks. FCI will also reach out to the [Disabled Veterans' Outreach Program Specialists \(DVOPS\) & Local Veterans' Employment Representatives \(LVERs\)](#) in our area to explore the creation of an on-the-job training and mentorship program for protected veterans. FCI will also begin hosting briefing sessions and facility tours for representatives of local organizations that provide employment services to protected veterans.

IX. Internal Dissemination of Policy [41 CFR 60-300.44(g)]

FCI has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified protected veterans. 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 of 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 60-300.44(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, protected veterans 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 are 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 and 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;
2. Summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs relating to protected veterans [withheld from distribution or public inspection to ensure confidentiality]; and

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 VEVRAA AAP that it makes available to applicants and employees (including managers), as they contain information that could violate the privacy and confidentiality of specific individuals. Such items should only be made available to OFCCP and to those employees responsible for the development and implementation of the AAP.

3. An applicant flow log showing the name, race, ethnicity, sex, protected veteran 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 ensure confidentiality].

XI. Supporting Data

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

VEVRAA 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 (41 CFR 60-300.42(a))	As of May 1, 2014, FCI invites applicants to self-identify as a protected veteran pre-offer using a form that conforms to OFCCP requirements at 41 CFR 60-300.42(a) and (c)).	May 1, 2014; (C)	
Invitation to self-identify at the post-offer stage (41 CFR 60-300.42(b))	FCI invites applicants to self-identify as a protected veteran post-offer using a form that conforms to OFCCP requirements at 41 CFR 60-300.42(b) and (c)).	December 1, 2014; (C)	
Policy Statement (41 CFR 60-300.44(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 disabled veterans.	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 60-300.44(b))	FCI conducts periodic review of personnel processes using procedures designed to facilitate this review.	December 1, 2014; (C)	
Physical and Mental Qualifications (41 CFR 60-300.44(c))	FCI provides and adheres to a schedule for reviewing all physical and mental qualification standards in the AAP.	December 1, 2014; (NC)	
	FCI demonstrates that, if a physical/mental qualification standard tends to screen out qualified disabled veterans, the standards are job-related and consistent with business necessity	December 1, 2014; (C)	

VEVRAA AAP Component	Requirements	Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))	Follow-on or remedial actions
Reasonable Accommodation (41 CFR 60-300.44(d))	FCI provides reasonable accommodation to the known physical and mental limitations of otherwise qualified disabled veterans absent undue hardship	December 1, 2014; (C)	
Reasonable Accommodation (41 CFR 60-300.44(d))	If employees who are known disabled veterans 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, ask 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 60-300.44(e))	FCI has developed and implemented procedures to ensure employees are not harassed on the basis of protected veteran status and provided those procedures in the AAP.	December 1, 2014; (C)	
External dissemination of policy, outreach, and positive recruitment (41 CFR 60-300.44(f))	FCI undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified protected veterans.	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.
	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.

VEVRAA 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 60-300.44(f))	1. FCI conducts an overall assessment <u>annually</u> ;		
	2. FCI documents criteria it uses in its assessment, which includes data collected pursuant to 41 CFR 60-300.44(k) for current year and the two most recent previous years;		
	3. 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 protected veterans		
	4. 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		
	5. FCI documents these assessments and retains such documents for 3 years.		
Internal Dissemination of Policy (41 CFR 60-300.44(g))	FCI includes its affirmative action policy in the policy manual or make 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 60-300.44(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 protected veterans 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)	
	FCI documents the actions it takes to comply with audit and reporting system obligations and retains these documents as employment records.	Pending implementation	FCI will begin documenting all audit and reporting activities starting January 1, 2015
	FCI undertake necessary action to bring AAP into compliance if it finds any deficiencies.	December 1, 2014	
Responsibility for Implementation (41 CFR 60-300.44(i))	FCI assigns an official the responsibility for implementation of its AAP activities whose identify 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)	

VEVRAA AAP Component	Requirements	Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))	Follow-on or remedial actions
Training (41 CFR 60-300.44(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 60-300.44(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"> <i>1. The number of applicants who self-identified as protected veterans at the pre-offer stage of FCI's employment process;</i> <i>2. The total number of job openings;</i> <i>3. Total number of jobs filled;</i> <i>4. The total number of applicants for all jobs;</i> <i>5. The number of protected veteran applicants hired;</i> <i>6. The total number of applicants hired.</i> 	Pending implementation	FCI will begin collecting required data starting January 1, 2015.
Hiring Benchmarks (41 CFR 60-300.45)	FCI establishes a hiring benchmark annually using the national percentage of veterans in the civilian labor force provided by OFCCP and will use the percentage in its next assessment of the effectiveness of FCI's outreach and recruitment efforts towards protected veterans.	December 1, 2014; (C)	

b. Personnel Activity (establishment-wide)² [Withheld from distribution or public inspection to ensure confidentiality]

Hires		Applicants		Promotions – Into Job Group		Terminations		Layoffs		Recalls	
Total	Vet	Total	Vet	Total	Vet	Total	Vet	Total	Vet	Total	Vet
17	3	250	30	5	0	6	0	0	0	0	0

c. Applicant flow log [Withheld from distribution or public inspection to ensure confidentiality]

Name	Race/ Ethnicity	Sex	VET (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 protected veterans, and such revisions were implemented on June 1, 2014. Data pertaining to protected veterans 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 60-300.44(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 protected veterans, 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 protected veterans 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 Affirmative Action Program (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 protected veterans 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 who are protected veterans 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 protected veterans.

XIII. EEO and Affirmative Action Training [41 CFR 60-300.44(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 protected veterans 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 who are protected veterans 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 disabled veterans unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any information regarding self-identification of protected veteran status; and
- Ensure that nondiscrimination is adhered to in all personnel activities.

XIV. Applicant and Hiring Data [41 CFR 60-300.44(k)]

[Withheld from distribution or public inspection to ensure confidentiality]

FCI collects employee data pertaining to protected veterans in order to assess the effectiveness of the company's outreach and recruitment efforts. FCI invites applicants to voluntarily inform the company whether they believe they are protected veterans in compliance with the VEVRAA requirements.

	2014	2015	2016
Number of applicants who self-identify as protected veterans before an offer of employment is made	30 ⁴		
Total number of job openings	17		
Total number of jobs filled	17		
Total number of applicants for all jobs	250		
Number of protected veteran applicants hired	3		
Total number of applicants hired	17		

⁴ FCI began inviting applicants to self-identify as protected veterans prior to an offer of employment on June 1, 2014.

XV. Hiring Benchmarks [41 CFR 60-300.45]

a. Establishment of Hiring Benchmark

FCI has adopted the national percentage of veterans in the civilian labor force provided by OFCCP, currently 7.2%, as its hiring benchmark for the 2015 AAP year. In its AAP update on January 1, 2016, FCI will analyze its success in hiring protected veterans during the course of this AAP year based on this benchmark and use that analysis as one of the criteria in its assessment of the effectiveness of its outreach and recruitment efforts.