

SAMPLE AFFIRMATIVE ACTION PROGRAM (AAP)

The following sample AAP is for illustrative purposes only and does not represent the only styles and formats that meet regulatory requirements. While this sample has been constructed around a company with less than 150 employees, thereby allowing the AAP job groups to be formulated according to OFCCP occupational categories as authorized by 41 CFR 60-2.12(e)¹, it may be used as a guide for larger employers.

When preparing an AAP, it should be customized to reflect an employer's organizational structure, policies, practices, programs, and data. Usually a separate AAP is required for each establishment. In appropriate circumstances, an establishment may include several facilities located at two or more sites if the facilities are in the same labor market or recruiting area.

In addition to the records an employer is required to compile and maintain to support the AAP [41 CFR 60-1.12 and 60-2.17(d)], the employer should also keep materials evidencing its affirmative action efforts. This may include items such as copies of collective bargaining agreements and other documents that indicate employment policies and practices; copies of letters sent to suppliers and vendors stating the EEO/affirmative action policy; copies of letters sent to recruitment sources and community organizations; and copies of contract language incorporating the regulatory EEO clause [41 CFR 60-1.4].

¹ Employers may use the EEO-1 categories for this purpose. See footnote 2 for further discussion.

FEDERAL CONTRACTOR, INC. (FCI)
EXECUTIVE ORDER 11246
SAMPLE AFFIRMATIVE ACTION PROGRAM

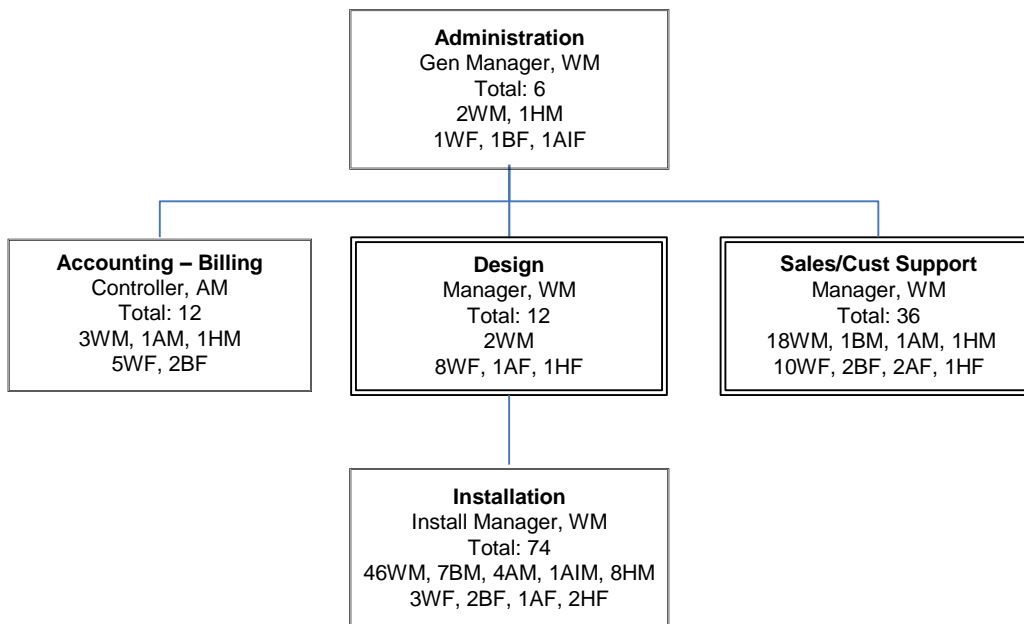
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Organizational Display

The **Organizational Display** is a detailed chart of the contractor's organizational structure. For each organizational unit, the display must indicate the following:

- The name of the unit and the job title, race and gender of the unit supervisor
- The total number of male and female incumbents and the total number of male and female incumbents in each of the following groups: Blacks, American Indians, Asians, Hispanics, and whites other than Hispanics².

Federal Contractor, Inc. (FCI)



Note that the organizational display shows each department, the race/sex of the supervisor(s) and employees within each department, and how all of the departments relate to each other.

² OFCCP's regulations regarding the race, ethnicity, and job categories to be used by contractors have not changed to reflect the new categories required for the EEO-1 Report. However, OFCCP will accept AAPs and supporting records that reflect the categories outlined in either 41 CFR Part 60-2 or the new EEO-1 Report.

For more information, see OFCCP's Directive at <http://www.dol.gov/ofccp/regs/compliance/directives/dirindex.htm>

Workforce Analysis

DEPARTMENT/WORK UNIT: Administration					MALES						FEMALES					
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic
General Manager	S-A	1	1	1	1	1										
Personnel Manager	S-D	1	1	1	1	1										
Executive Assistant	S-J	5	5	1							1	1				
Administrative Assistant	H-8	5	5	1							1		1			
File Clerk	H-11	5	5	2	1					1	1				1	
DEPARTMENT TOTAL				6	3	2				1	3	1	1		1	

Workforce Analysis

DEPARTMENT/WORK UNIT: Accounting – Billing					MALES						FEMALES					
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic
Controller	S-C	1	1	1	1			1								
Pricing-Billing Manager	S-E	1	1	1	1	1										
General Ledger Accountant	S-F	2	2	1							1	1				
Payroll Administrator	S-H	2	2	1	1	1										
Billing Clerk	H-5	5	5	3	1					1	2	2				
Material Pricing Clerk	H-5	5	5	3	1	1					2	1	1			
Administrative Assistant	H-8	5	5	2							2	1	1			
DEPARTMENT TOTAL				12	5	3		1		1	7	5	2			

Workforce Analysis

DEPARTMENT/WORK UNIT: Accounting – Design					MALES						FEMALES					
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic
Interior Design Manager	S-E	1	1	1	1	1										
Interior Designer	S-M	2	2	2							2	1				1
Office Space Planner	S-M	2	2	5	1	1					4	4				
Administrative Assistant	H-8	5	5	2							2	2				
File Clerk	H-11	5	5	2							2	1		1		
DEPARTMENT TOTAL				12	2	2					10	8		1		1

Workforce Analysis

DEPARTMENT/WORK UNIT: Sales - Customer					MALES						FEMALES					
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic
Customer Support Manager	S-G	1	1	1	1	1										
Pricing Specialist	S-J	2	2	6	5	3	1	1			1					
Purchasing Agent	S-J	2	2	7	5	5					2	2				
Office Equipment Sales Representative	S-K	4	4	10	8	8					2	2				
Customer Information Sales Representative	H-7	5	5	6							6	4		1		
Call Center Agent	H-7	5	5	3	1	1					2	1	1			
Customer Service Complaints Clerk	H-8	5	5	3	1					1	2	1		1		
DEPARTMENT TOTAL				36	21	18	1	1		1	15	10	2	2		1

Workforce Analysis

DEPARTMENT/WORK UNIT: Installation					MALES						FEMALES					
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic	Total	White	Black/AA	Asian/PI	American Indian/AN	Hispanic
Installation Manager	S-F	1	1	1	1	1										
Installation Supervisor	S-G	1	1	1	1	1										
Furniture Repair Supervisor	S-G	1	1	1	1	1										
Inventory Control Clerk	H-9	5	5	2							2	1				1
Systems Specialist	H-9	6	6	12	10	8				2	2	1	1			
Installer	H-10	6	6	18	17	12	2	1		2	1					1
Furniture Repair	H-10	6	6	13	12	7		3		2	1		1			
Truck Driver	H-11	7	7	8	7	5	1		1		1	1				
Forklift Operator	H-12	7	7	2	2	1	1									
Installer Helper	H-13	8	8	13	12	8	2			2	1			1		
Receiving	H-13	8	8	3	3	2	1									
DEPARTMENT TOTAL				74	66	46	7	4	1	8	8	3	2	1		2

**Job Group Analysis:
Listing of Job Titles**

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 Furniture Repair Supervisor	1	Officials & Managers
Interior Designer Office Space Planner General Ledger Accountant Payroll Administrator Purchasing Agent Pricing Specialist	2	Professionals
Office Sales Representative	4	Sales Workers
Executive Assistant Administrative Assistant File Clerk Billing Clerk Inventory Control Clerk Material Pricing Clerk Customer Information Sales Representative Call Center Agent Customer Service Complaints Clerk	5	Office & Clericals
Systems – Specialist Installer Furniture Repair	6	Craftworkers
Truck Driver Forklift Operator	7	Operatives
Installer Helper Receiving	8	Laborers

**Utilization Analysis:
Placement of Incumbents in Job Groups**

Job Group	Total # of Incumbents	# of Females	Female Incumbency %	# of Minorities	Minority Incumbency %
1	9	0	0.0	1	11.1
2	22	10	45.5	4	18.2
4	10	2	20.0	0	0.0
5	30	25	83.3	13	43.3
6	43	4	9.3	15	34.9
7	10	1	10.0	3	30.0
8	16	1	6.3	6	37.5

**Utilization Analysis:
Determining Availability³**

Job Group: 6	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics	Reason for Weighting
	Minority	Female		Minority	Female		
1. Percentage of minorities or women with requisite skills in the reasonable recruitment area	18.4%	40.2%	10%	1.84%	4.02%	2000 Census Data	
2. Percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.	20.1%	44.6%	90%	18.09%	40.14%		
Totals:			100%	19.93%	44.16%	< Final Factor	

³ The example is of one job group only. Contractors must conduct an analysis of each of the job groups and determine availability for each [41 CFR 60-2.12 – 60-2.14]. Please note that the chart includes fictionalized numbers designed for illustrative purposes.

**Utilization Analysis:
Comparing Incumbency to Availability
and
Establishing Placement Goals**

Job Group	Female Incumbency %	Female Availability %	Establish Goal? Yes/No	If Yes, Goal for Females	Minority Incumbency %	Minority Availability %	Establish Goal? Yes/No	If Yes, Goal for Minorities
1	0.0	47.6%	Yes	47.6%	11.1%	18.1%	Yes	18.1%
2	45.5%	43.8%	No		18.2%	8.2%	No	
4	20.0%	34.5%	Yes	34.5%	0.0%	12.4%	Yes	12.4%
5	83.3%	87.7%	No	*	43.3%	27.6%	No	
6	9.3%	44.16%	Yes	44.16%	34.9%	19.93%	No	
7	10.0%	6.3%	No		30.0%	37.5%	No	*
8	6.3%	19.1%	Yes	19.1%	37.5%	26.3%	No	

*The 80% rule of thumb was followed in declaring underutilization and establishing goals when the actual employment of minorities or females is less than 80% of their availability. If the female/minority incumbency percent (%) is less than the female/minority availability percent (%) and the ratio of incumbency to availability is less than 80%, a placement goal should be included in the appropriate "If Yes" column.

Designation of Responsibility for Implementation

Responsibilities of the Equal Employment Opportunity Manager:

The Personnel Manager has the responsibility for designing and ensuring the effective implementation of Federal Contractor, Inc's. (FCI's) Affirmative Action Program (AAP). These responsibilities include, but are not limited to, the following:

1. Developing Equal Employment Opportunity (EEO) policy statements, affirmative action programs and internal and external communication procedures;
2. Assisting in the identification of AAP/EEO problem areas;
3. Assisting management in arriving at effective solutions to AAP/EEO problems;
4. Designing and implementing an internal audit and reporting system that:
 - a. Measures the effectiveness of FCI's program;
 - b. Determines the degree to which AAP goals and objectives are met; and
 - c. Identifies the need for remedial action;
5. Keeping FCI's General Manager informed of equal opportunity progress and reporting potential problem areas within the company through quarterly reports;
6. Reviewing the company's AAP for qualified minorities and women with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
7. Auditing the contents of the company's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between FCI and enforcement agencies.

Responsibilities of Managers and Supervisors:

It is the responsibility of all managerial and supervisory staff to implement FCI's AAP. These responsibilities include, but are not limited to:

1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary;
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and

3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

Identification of Problem Areas

<i>Areas of Concern</i>	<i>Corrective Actions</i>
<ul style="list-style-type: none"> Underutilization of minorities and women in Job Groups 1 and 4 where external hiring opportunities occurred. Concern regarding low minority and female applicant flow rate resulting from inadequate recruitment for both job groups. 	<ul style="list-style-type: none"> No later than March 1, 2010, notify management and professional recruitment sources, in writing, of FCI's interest in attracting qualified minorities and women to apply for job openings. No later than March 1, 2010, expand FCI's recruitment program to colleges and universities with a significant percentage of minority and female students.
<ul style="list-style-type: none"> Underutilization of women in Job Groups 6 and 8 craft workers and entry-level blue-collar jobs. Concern regarding low female applicant flow rate resulting from inadequate recruitment. 	<ul style="list-style-type: none"> No later than January 1, 2010, contact the local YWCA, local vocational school, and training centers to inform them of FCI's interest in attracting qualified female applicants.
<ul style="list-style-type: none"> High termination rate for females in Job Group 8. 	<ul style="list-style-type: none"> Immediately review exit interview survey of terminated females to confirm voluntary reason for leaving.

Action-Oriented Programs

FCI has instituted action programs to eliminate identified problem areas and to help achieve specific affirmative action goals. These programs include:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
2. Reviewing job descriptions by department and job title using job performance criteria;
3. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
4. Evaluating the total selection process to ensure freedom from bias through:
 - a. Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
 - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
 - c. Training personnel and management staff on proper interview techniques; and
 - d. Training in EEO for management and supervisory staff;
5. Using techniques to improve recruitment and increase the flow of minority and female applicants. FCI presently undertakes the following actions:
 - a. Include the phrase "Equal Opportunity/Affirmative Action Employer" in all printed employment advertisements;
 - b. Place help wanted advertisement, when appropriate, in local minority news media and women's interest media;
 - c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
 - d. Encourage all employees to refer qualified applicants;
 - e. Actively recruit at secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments; and

- f. Request employment agencies to refer qualified minorities and women;
- 6. Hiring a statistical consultant to help FCI perform a self-audit of its compensation practices; and
- 7. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
 - a. Posting promotional opportunities;
 - b. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
 - c. Evaluating job requirements for promotion.

Internal Audit and Reporting System

The Personnel Manager has the responsibility for developing and preparing the formal documents of the AAP. The Personnel Manager is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each department manager and supervisor. FCI's audit and reporting system is designed to:

- Measure the effectiveness of the AAP/EEO program;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which FCI's AAP goals and objectives have been obtained.

The following personnel activities are reviewed to ensure nondiscrimination and equal employment opportunity for all individuals without regard to their race, color, sex, sexual orientation, gender identity, religion, or national origin:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, award of tenure, layoff, recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Sick leave, leaves or absence, or any other leave;
- Training, apprenticeships, attendance at professional meetings and conferences; and
- Any other term, condition, or privilege of employment.

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

1. An applicant flow log showing the name, race, sex, date of application, job title, interview status and the action taken for all individuals applying for job opportunities;
2. Summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification;
3. Summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants for each position;
4. Maintenance of employment applications (not to exceed one year); and
5. Records pertaining to FCI's compensation system.

FCI's audit system includes a quarterly report documenting FCI's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the Personnel Manager. During quarterly reporting, the following occurs:

1. The Personnel Manager will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the General Manager; and
2. The Personnel Manager will report the status of the FCI's AAP goals and objectives to the General Manager. The Personnel Manager will recommend remedial actions for the effective implementation of the AAP.

**Support Data:
Personnel Activity**

OFCCP Category: Officials and Managers Job Group: 1	External Hires		External Applicants		Promotions – Into Job Group		Promotions - Within Job Group	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White	1		8		1			
Black/African American				1				
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)	1		8	1	1			

**Support Data:
Personnel Activity**

OFCCP Category: Officials and Managers Job Group: 1	Voluntary Terminations & Retirements		Involuntary Terminations		Layoffs		Recalls	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White								
Black/African American			1					
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)			1					

**Support Data:
Personnel Activity**

OFCCP Category: Professionals Job Group: 2	External Hires		External Applicants		Promotions – Into Job Group		Promotions - Within Job Group	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White	2		6	9			1	
Black/African American			1	1				
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic			1			1		
Race Missing or Unknown								
TOTAL (count each person once only)	2		8	10		1	1	

**Support Data:
Personnel Activity**

OFCCP Category: Professionals Job Group: 2	Voluntary Terminations & Retirements		Involuntary Terminations		Layoffs		Recalls	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White								
Black/African American								
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)								

**Support Data:
Personnel Activity**

OFCCP Category: Sales Workers Job Group: 4	External Hires		External Applicants		Promotions – Into Job Group		Promotions - Within Job Group	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White								
Black/African American								
Asian/Pacific Islander								
American Indian/Alaskan Native								1
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)								1

**Support Data:
Personnel Activity**

OFCCP Category: Sales Workers Job Group: 4	Voluntary Terminations & Retirements		Involuntary Terminations		Layoffs		Recalls	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White			1					
Black/African American								
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)			1					

**Support Data:
Personnel Activity**

OFCCP Category: Office and Clerical Job Group: 5	External Hires		External Applicants		Promotions – Into Job Group		Promotions - Within Job Group	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White	1		5	46				1
Black/African American		1	2	3				
Asian/Pacific Islander			2					
American Indian/Alaskan Native				1				
Hispanic			1	3				
Race Missing or Unknown								
TOTAL (count each person once only)	1	1	10	53				1

**Support Data:
Personnel Activity**

OFCCP Category: Office and Clerical Job Group: 5	Voluntary Terminations & Retirements		Involuntary Terminations		Layoffs		Recalls	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White								
Black/African American								
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic			1					
Race Missing or Unknown								
TOTAL (count each person once only)			1					

**Support Data:
Personnel Activity**

OFCCP Category: Craftworkers Job Group: 6	External Hires		External Applicants		Promotions – Into Job Group		Promotions - Within Job Group	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White	2		15	2	1		1	
Black/African American		1	1	1				
Asian/Pacific Islander			2	1	1			
American Indian/Alaskan Native								
Hispanic	1							
Race Missing or Unknown								
TOTAL (count each person once only)	3	1	18	4	2		1	

**Support Data:
Personnel Activity**

OFCCP Category: Craftworkers Job Group: 6	Voluntary Terminations & Retirements		Involuntary Terminations		Layoffs		Recalls	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White	1			1				
Black/African American								
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)	1			1				

**Support Data:
Personnel Activity**

OFCCP Category: Operatives Job Group: 7	External Hires		External Applicants		Promotions – Into Job Group		Promotions - Within Job Group	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White					1		1	
Black/African American								
Asian/Pacific Islander							1	
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)					1		2	

**Support Data:
Personnel Activity**

OFCCP Category: Operatives Job Group: 7	Voluntary Terminations & Retirements		Involuntary Terminations		Layoffs		Recalls	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White								
Black/African American								
Asian/Pacific Islander								
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)								

**Support Data:
Personnel Activity**

OFCCP Category: Laborers Job Group:8	External Hires		External Applicants		Promotions – Into Job Group		Promotions - Within Job Group	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White			19	1			1	
Black/African American	1		3					
Asian/Pacific Islander			1					
American Indian/Alaskan Native								
Hispanic			4					
Race Missing or Unknown								
TOTAL (count each person once only)	1		27	1			1	

**Support Data:
Personnel Activity**

OFCCP Category: Laborers Job Group: 8	Voluntary Terminations & Retirements		Involuntary Terminations		Layoffs		Recalls	
	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES	MALES	FEMALES
White								
Black/African American			1					
Asian/Pacific Islander			1					
American Indian/Alaskan Native								
Hispanic								
Race Missing or Unknown								
TOTAL (count each person once only)			2					

Support Data

ANALYSIS OF AFFIRMATIVE ACTION PROGRAM PROGRESS: [] PRIOR YEAR AAP [] CURRENT YEAR AAP

JOB GROUP*		GOAL PLACEMENT RATE (%)**	ACTUAL PLACEMENT RATE (%)***	ANALYSIS OF GOOD FAITH EFFORTS
	MINORITY			
	FEMALE			
	MINORITY			
	FEMALE			
	MINORITY			
	FEMALE			
	MINORITY			
	FEMALE			

* JOB GROUPS WHERE GOALS ARE REQUIRED

** GOAL PLACEMENT RATE EQUALS AVAILABILITY PERCENTAGE RATE FOR MINORITIES OR FEMALES AS APPLICABLE

*** ACTUAL PLACEMENT RATE FOR MINORITIES OR FEMALES FOR A PARTICULAR JOB GROUP IS EQUAL TO THE NUMBER OF MINORITY OR FEMALE PLACEMENTS DIVIDED BY THE TOTAL NUMBER OF PLACEMENTS. FOR EXAMPLE, IF JOB GROUP A EXPERIENCED 45 FEMALE PLACEMENTS OUT OF 90 TOTAL PLACEMENTS, THE ACTUAL PLACEMENT RATE FOR FEMALES IS (45/90=.50) OR 50%.

Guidelines on Discrimination Because of Religion or National Origin

It is the policy of FCI, Inc. to take affirmative action to insure that applicants are employed, without regard to their religion or national origin. Such action includes, but is not limited to the following employment practices: hiring, promotion, demotion, transfer, recruitment or recruitment advertising, layoff, termination, rates of pay or other forms of compensation and selection for training.

Employment practices have been reviewed to determine whether members of the various religions and/or ethnic groups are receiving fair consideration for job opportunities. Attention has been directed toward executive and middle management levels.

1. The policy concerning FCI's obligation to provide equal employment opportunity without regard to religion or national origin is communicated to all employees via employee handbooks, policy statement and the Affirmative Action Program.
2. Internal procedures have been developed in this program to insure that FCI's obligation to provide equal employment opportunity without regard to religion or national origin is being fully implemented. **[LIST PROCEDURES]**
3. Employees are informed at least annually of FCI's commitment to equal employment opportunity for all persons, without regard to religion or national origin.
4. Recruiting sources have been informed of our commitment to provide equal employment opportunity without regard to religion or national origin.
5. Employment records of all employees are reviewed to determine the availability of promotable and transferable employees.
6. Contacts with religious and ethnic organizations will be made for purposes of advice, education, technical assistance and referral of potential employees as necessary to accomplish the purpose of this program.
7. FCI engages in recruitment activities at educational institutions with substantial enrollments of students from various ethnic and religious groups.
8. Ethnic and religious media may be used for employment advertising.

Reasonable accommodations to the religious observances and practices of employees or prospective employees will be made, unless doing so would result in undue hardship. In determining whether undue hardship exists, factors such as the cost to the company and the impact on the rights of other employees would be considered.