Client Resource

Guide to Affirmative Action Reports

balance AAP software





Introduction

The Client's Guide to Affirmative Action Plan Reports will help you understand the required and supporting reports that are included in an Affirmative Action plan (AAP), which serves as a vehicle to assess the state of your organization's workforce diversity. Because an AAP is intended to help you formulate Affirmative Action efforts going forward, this resource will help you in communicating AAP results to others within your organization.

What this Guide Covers

This *Guide* covers all required reports, key supporting reports, and monitoring reports, as produced by Berkshire's balanceAAP (and REACH) software. These reports are organized in the Table of Contents, on the next page, by Report Group. For each report, a written summary and a sample report are shown for your reference. Additional reports are available in the software.

The report samples provided in this guide will rely on the most commonly used settings for compliance purposes and to meet typical client needs. If you are interested in reviewing other options, the full array of report settings will be highlighted at the beginning of each *Guide* section.

Required Reports

AAP-required reports are marked with a **Required** symbol: ✓ Required

If You Need Additional Support

We hope you find this guide to be a valuable resource in understanding and interpreting AAP results and related analyses. If you have additional questions, person-to-person support is also available:

Berkshire Service Customers – Contact your AAP consultant for an appointment by telephone at (800) 882-8904, or email: ClientData@berkshireassociates.com. Your consultant can assist you with questions regarding AAP reports.

Software Customers – Technical support for balanceAAP software is available by calling (800) 882-8904, during the following hours:

8:30 a.m. – 8 p.m. ET, Monday – Thursday, and 8:30 a.m. – 5 p.m. ET, Friday.

Help from a product support representative is also available by email at: product.support@berkshireassociates.com, or you may click the request button within the software, located in the software header.



Table of Contents

C	VERVIEW REPORTS	5
	Plan Summary	5
	Progress Summary (Update Plan)	10
N	IAIN AAP REPORTS	12
	Workforce Analysis	12
	Organizational Display / Supervisor by Department	14
	Annotated Employee List by Department	17
	Job Group Analysis	19
	Job Group Analysis Summary	19
	Annotated Employee List by Job Group	22
	Availability Factor Computation Form	23
	Incumbency vs. Estimated Availability	25
	Placement Goals	27
	Goal Attainment	29
	Applicant Summary	30
	New Hire Summary	32
	Promotion Summary by Old Job	33
	Termination Summary	34
U	TILIZATION	35
	Requisite Skills Calculations	35
	Feeder Job Calculations	37
	Shortfall	38
	Availability Worksheet	39
	Recruitment Area Composition	40

IWD/VETERANS	41
Data Collection Analysis for Individuals with Disabilities	41
Data Collection Analysis for Protected Veterans	42
Individuals with Disabilities Utilization Goals	43
Veterans Benchmarks for Hiring Analysis	43
ADVERSE IMPACT	44
Introduction to the Adverse Impact Report Group	44
Calculating Adverse Impact Ratio Analysis by Favored Group	45
Adverse Impact for Applicants	46
Detail for Applicants	47
Adverse Impact for Promotions	48
Detail for Promotions	49
Adverse Impact for Terminations	50
Detail for Terminations	51
COMPENSATION	52
Compensation Summary by Title	52
REACH (GOOD FAITH EFFORTS TRACKING)	53
Sources Summary Statistics	54
Source Detail List	55
Sample GFE Insertion in Minorities and Women Narrative	55
Evaluation Detail List	56
EXHIBIT A: REPORT AND AUDIT SCHEDULING LETTER CROSSWALK	1
EVHIRIT R. SAMDLE ALIDIT SCHEDILLING LETTER ITEMIZED LIST	,

Overview Reports

Plan Summary

The *Plan Summary* provides a multi-page synopsis of results by topic that can be used to communicate about the state of Affirmative Action within your organization. For detailed information on the topics above, please refer to the underlying reports, using the links below:

- **Employment** Total employee counts/percentages by minority and female.
- <u>Incumbency vs. Estimated Availability</u> Potential areas of underutilization of minorities and females by job group, based on the Utilization rule in place.
- <u>Personnel Activity</u> Counts/percentages for the protected classes by personnel action.
- Adverse Impact This measure, formally referred to as "adverse impact ratio analysis"
 (adverse IRA), evaluates each personnel action to ascertain whether disproportionate selection rates exist by gender or race/ethnicity. The selection rate for the "favored" group (i.e., the group with the highest selection rate) is compared to the selection rate for the other analysis groups.
 (The Summary differs from full reports, by highlighting results having statistical significance.)
- <u>Goal Attainment</u> Progress made during the current plan year, through hiring and promotion, in meeting placement goals set in the prior year.
- <u>IWD/Veterans</u> IWD utilization and Veteran hiring, compared to goal and benchmark, respectively.

A Progress Summary, also shown in this section, is available in an interim Update plan.

Overview Report Settings:

Plan Summary for an Annual Plan (or Progress Summary for an interim Update Plan)

- Overall
 - o Run for Minorities/Females (default) OR Run for protected classes selected in plan settings
 - o Choose activities (Defaults: Applicant, New Hire, Promotion, Termination, Involuntary Termination)
- Do you want to include an Individuals with Disabilities analysis?
 - o Yes, I want to include analysis for Individuals with Disabilities.(default, Plan Summary)
 - o No, I don't want to include analysis for Individuals with Disabilities. (default, Progress Summary)
- Do you want to include a Protected Veterans analysis?
 - o Yes, I want to include analysis for Protected Veterans. (default, Plan Summary)
 - o No, I don't want to include analysis for Protected Veterans.(default, Progress Summary)
- Incumbency vs. Estimated Availability How would you like to show groups with goals on your Plan Summary?
 - Show all groups
 - Show groups w/ goals (default)
 - o Show groups w/ significant goals (i.e., adverse impact must be statistically significant)
- Adverse Impact How would you like to show Adverse Impact on your Plan Summary?
 - Show Adverse Impact by Favored Group (default)
 - Show Traditional Adverse Impact
 - Do Not Show Adverse Impact
- Adverse Impact How would you like to show groups with Adverse Impact on your Plan Summary?
 - o Show all groups
 - Show groups w/ Adverse IRA
 - Show groups w/ significant Adverse Impact (default)
- Recruitment Areas Hide Recruitment Areas section (default)

Plan Summary

Minorities And Women

Employment Data as of 6/30/2019

	Total Employees	Min	Fem
#	482	166	268
%		34.44	55.60

Incumbency vs. Estimated Availability

For incumbency vs. availability, lists job groups with goals.



	20	Entry L	everrior
Total Emp		Min	Fem
60	Employment %	15.00	60.00
	Availability %	38.48	54.54
	Statistical Value	3.738	

	5A	Senior Level Clerical					
Total Emp		Min	Fem				
54	Employment %	25.93	88.89				
	Availability %	51.81	82.18				
	Statistical Value	3.807					
/allaw shading in	diantan planamant a	aala radab	ading indicat	00 050			

Yellow shading indicates placement goals, red shading indicates areas that require more focus.

In the Statistical Value section, standard deviations of 2.00 or greater are generally regarded as statistically significant. For groups with fewer than 30 employees, the Exact Binomial Test is used and scores are marked with "E". "E" scores of 0.050 or less are generally regarded as statistically significant.

S - Significant Difference Rule

A placement goal is set when employment is less than availability by a statistically significant amount.

Yellow highlight indicates potential underutilization, based on the chosen Utilization rule.

In this example, the Significant Different Rule was chosen, as outlined in green below.

Red highlight on Statistical Value would indicate the underutilization is statis

Page 1 of 4

Personnel Activity Data for: 7/1/2018 - 6/30/2019

		Total	Min	Fem	Unk Race	Unk Gend
Applicant Pool	#	439	182	305	42	19
	%		41.46	69.48	9.57	4.33
Applicant Selected	#	43	21	36	0	0
	%		48.84	83.72	0.00	0.00

Mid Laws Ducks as is under

Totals in Applicant Pool versus Selected

Min Fem Total New Hire 43 21 36 48.84 83.72 Promotion 47 14 20 29.79 42.55 Termination 15 3 14 % 20.00 93.33 Involuntary Termination 5 1 5 % 100.00 20.00 Voluntary Termination # 10 2 9 20.00 90.00

Totals for other personnel actions

Statistical value of difference in selection rate between favored group and non-favored group

- YES Yellow highlight indicates adverse IRA (impact ratio analysis) finding.
- YES Red highlight indicates difference in selection rates is statistically significant.

Executive Management 1A Action Type Favored Group **Protected Class** Adv IRA Stat Sig? Sel Ratio Stat Value **Shortfall** 2 Applicant Mal YES 0.00 2.789 Fem

2A	Senior Level Professionals											
Action Type	Protected Class	Adv IRA	Sel Ratio	Stat Value	Shortfall	Stat Sig?	Favored Group					
Applicant	Fem	YES	0.00	2.022	1	YES	Mal					
Applicant	Wht	YES	0.00	2.697	2	YES	Min					
Applicant	Wht	YES	0.00	4.522	2	YES	Blk					

2B	IVIId Level Professionals						
Action Type	Protected Class	Adv IRA	Sel Ratio	Stat Value	Shortfall	Stat Sig?	Favored Group
Applicant	Wht	YES	0.05	3.461	0	YES	Blk
Promotion	Fem	YES	0.06	3.750	4	YES	Mal

Page 2 of 4

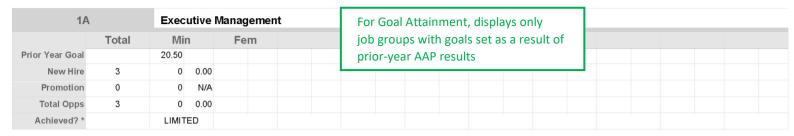
Adverse Impact

2C	Entry Level Professional	ntry Level Professionals												
Action Type	Protected Class	Adv IRA	Sel Ratio	Stat Value	Shortfall	Stat Sig?	Favored Group							
Applicant	Wht	YES	0.25	2.018	1	YES	Asi							
Promotion	Asi	YES	0.00	0.012F	1	YES	Blk							
Promotion	Wht	YES	0.25	2.781	2	YES	Blk							

5A	Senior Level Clerical						
Action Type	Protected Class	Adv IRA	Sel Ratio	Stat Value	Shortfall	Stat Sig?	Favored Group
Applicant	Blk	YES	0.25	2.416	3	YES	Wht
Applicant	Min	YES	0.21	2.752	4	YES	Wht

Infin - indicates that the denominator was zero

Goal Attainment





Page 3 of 4

[&]quot;--" indicates that the result could not be calculated

5A		Seni	or Leve	el Clerical								
	Total	Mi	n	Fem								
Prior Year Goal		51.81										
New Hire	13	3	23.08									
Promotion	5	1	20.00									
Total Opps	18	4	22.22									
Achieved? *		NC)									

Note - there was no prior year goal required for categories not listed above.

LIMITED = Limited Opportunities. This indicates the prior year goal percent multiplied by total opportunities to the job group was less than one person.

Individuals with Disabilites (IWD)

Individuals with Disabilities Utilization Goals Employment Data as of 6/30/2019

The following job groups fall below the established benchmark:

1A - Executive Management, 3A - Technicians

Protected Veterans Hiring Activity for: 7/1/2018 - 6/30/2019

Veteran Benchmark for Hiring

Hiring %	9.30
Benchmark %	5.90
Benchmark met?	Yes

Page 4 of 4

^{*} YES = within one person of exceeding prior year goal

Progress Summary (Update Plan)

Progress Summary

Minorities And Women

Employment Data as of 12/31/2019

	Total Employees	Min	Fem
#	496	187	301
%		37.70	60.69

Personnel Activity Data for: 7/1/2019 - 12/31/2019

		Total	Min	Fem	Unk Race	Unk Gend
Applicant Pool	#	411	176	285	36	18
	%		42.82	69.34	8.76	4.38
Applicant Selected	#	36	19	31	0	0
	%		52.78	86.11	0.00	0.00

		Total	Min	Fem
New Hire	#	36	20	36
	%		55.56	100.00
Promotion	#	39	11	17
	%		28.21	43.59
Termination	#	9	2	9
	%		22.22	100.00
Involuntary Termination	#	4	0	4
	%		0.00	100.00

Adverse Impact

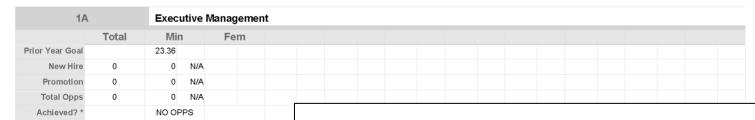
2A S	Senior Level Professionals						
Action Type	Protected Class	Adv IRA	Sel Ratio	Stat Value	Shortfall	Stat Sig?	Favored Group
Applicant	Wht	YES	0.00	4.357	0	YES	His
2B	/lid Level Professionals						
Action Type	Protected Class	Adv IRA	Sel Ratio	Stat Value	Shortfall	Stat Sig?	Favored Group
Promotion	Fem	YES	0.10	2.700	3	YES	Mal

Page 1 of 3

2C	Entry Level Professionals							
Action Type	Protected Class	Adv IRA	Sel Ratio	Stat Value	Shortfall	Stat Sig?	Favored Group	
Promotion	Asi	YES	0.00	0.012F	1	YES	Blk	
Promotion	Wht	YES	0.20	3.165	1	YES	Blk	

Infin - indicates that the denominator was zero

Goal Attainment



10	First Level Managers					
	Total	Min		Fe	m	
Prior Year Goal		41.67		71.88		
New Hire	0	0	N/A	0	N/A	
Promotion	2	0	0.00	1	50.00	
Total Opps	2	0	0.00	1	50.00	
Achieved? *		LIMIT	ΓED	YE	S	

2 <i>A</i>	Senior Level Professionals					
	Total	Min	Fem			
Prior Year Goal			52.50			
New Hire	0		0	N/A		
Promotion	6		4	66.67		
Total Opps	6		4	66.67		
Achieved? *			YE	S		

Individuals with Disabilities (IWD)

Individuals with Disabilities Utilization Goals Employment Data as of 12/31/2019

The following job groups fall below the established benchmark:

1A - Executive Management, 3A - Technicians, 5A - Senior Level Clerical

Protected Veterans Hiring Activity for 7/1/2019 - 12/31/2019

Veteran Benchmark for Hiring

Hiring %	8.33
Benchmark %	5.90
Benchmark met?	Yes

Change the default report settings to display IWD/Veteran metrics.

Benchmarks are set in the corresponding Annual plan.

Note - there was no prior year goal required for categories not listed above.

LIMITED = Limited Opportunities. This indicates the prior year goal percent multiplied by total opportunities to the job group was less than one person.

Page 2 of 3

[&]quot;--" indicates that the result could not be calculated

^{*} YES = within one person of exceeding prior year goal

Workforce Report Settings:

Workforce Analysis

- Exclude (department) Hierarchy Information (default)
- Insert Page Breaks between Departments

Order by - Grade (default), Salary Range OR Average Salary

Display – Show Grade; Show Salary (default) OR Show No Salary Information

Department Analysis – Show only Departments with Potential Problems (The default setting is to show all departments.)

Workforce Analysis



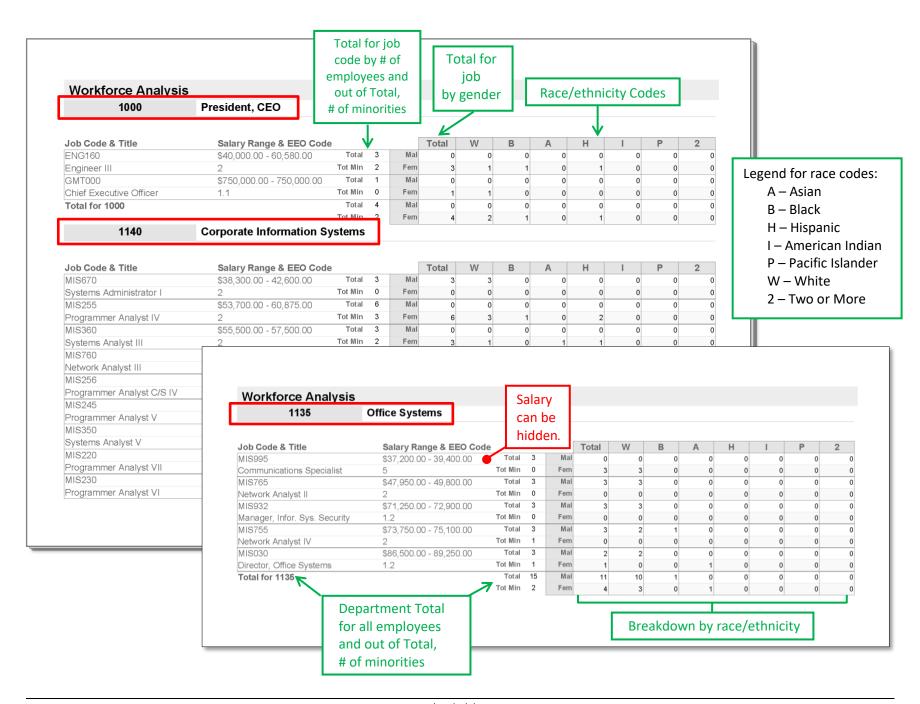
The Workforce Analysis is one of two reports that meet OFCCP requirements for preparing an organizational profile. (The alternative report is the Organizational Display.)

The Workforce Analysis is a detailed listing of each job title by department or organizational unit. This report also includes the required employment statistics for each job code/title within each department.

For each organizational department or unit, the Workforce Analysis includes the following:

- Department or unit code/name.
- Job codes and titles in each department, listed with the following:
 - o EEO Code
 - Grade or Salary Range
 - Total number of employees in each job title
 - Total number of male and female employees in each job title, broken down by race/ethnicity
- Job titles sorted by salary or grade from lowest to highest
- Total number of employees in the department
- Total number of males and females in the department, broken down by race/ethnicity

- Organizational Display/Supervisor by Department
- Annotated Employee List by Department





Organizational Display / Supervisor by Department



The *Organizational Display* is one of two reports that meet OFCCP requirements for preparing an organizational profile. (The alternative report is the *Workforce Analysis*.)

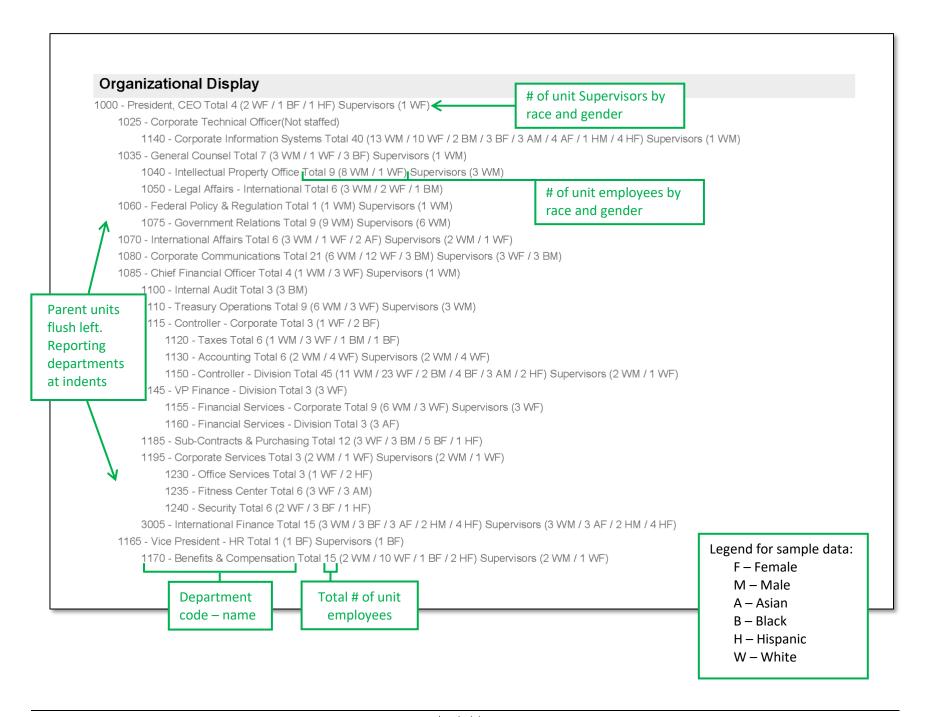
The *Organizational Display* is a detailed listing of organizational structure, including department hierarchy, employment statistics, and supervisor information.

Regulatory Guidance – For each organizational unit or department, the *Organizational Display* must include the following:

- Departments or units in hierarchical order (Unstaffed departments must be excluded.)
- Name of the department/unit
- Job title, gender, race, and ethnicity of the department/unit supervisor (if there is a supervisor)
- Total number of male and female incumbents
- Total number of male and female incumbents by race/ethnicity

Also required: The *Supervisor by Department* report, containing job title information for each departmental supervisor, must accompany the *Organizational Display*.

- Workforce Analysis
- Annotated Employee List by Department



The Supervisor by Department table accompanies the Organizational Display.

Supervisor by Department

•	Department Name	Job Title	Total	Race/Gender
1000	President, CEO	Chief Executive Officer	1	1 WF
1035	General Counsel	SVP Corporate Legal	1	1 WM
1040	Intellectual Property Office	Associate General Counsel	3	3 WM
1060	Federal Policy & Regulation	SVP Fed Pol & Reg Dept	1	1 WM
1070	International Affairs	Director, Intl Affairs	3	2 WM / 1 WF
1075	Government Relations	Mgr, Government Relations	3	3 WM
1075	Government Relations	VP Corporate Govt Relations	3	3 WM
1080	Corporate Communications	Mgr, Advertising/Promotions	3	3 BM
1080	Corporate Communications	VP Corporate Communications	3	3 WF
1085	Chief Financial Officer	SVP Corporate Finance	1	1 WM
1110	Treasury Operations	Director, Treasury Operations	3	3 WM
1130	Accounting	AVP Corporate Accounting	3	2 WM / 1 WF
1130	Accounting	Mgr, Financial Plng & Analysis	3	3 WF
1135	Office Systems	Director, Office Systems	3	2 WM / 1 AF
1135	Office Systems	Manager, Infor. Sys. Security	3	3 WM
1140	Corporate Information Systems	VP-CIO	1	1 WM
1150	Controller - Division	Division Controller	3	2 WM / 1 WF
1155	Financial Services - Corporate	Mgr, Financial Plng & Analysis	3	3 WF
1165	Vice President - HR	SVP Human Resources	1	1 BF
1170	Benefits & Compensation	AVP Compensation & Benefits	3	2 WM / 1 WF
1175	Staffing & Employee Relations	HR Manager III	3	1 WM / 2 HF
1180	Organizational Dev & Training	AVP Organization Development	3	2 WM / 1 AM
1195	Corporate Services	AVP Corporate Services	3	2 WM / 1 WF
1200	Corp Support	Chief Technical Officer	1	1 WM
1200	Corp Support	Division Head	3	3 WF
1250	Global Accounts	Director, Accounts	3	2 HM / 1 HF
1255	Sales - Non-Government	Sales Director	6	4 WM / 1 BF / 1 HM
1280	VP Engineering & Ops	Director, Product Devlopment	3	2 WF / 1 AF
1285	Engineering Mgmt	Director, Engineering Mgmt	3	2 WM / 1 AM
1295	Mechanical Engineering	Director, Mechanical Engineering	3	2 WM / 1 WF
2000	BAC Division Executive	SVP Division Executive	6	6 WM
2010	Sales - BAC Division	Director, Accounts	3	2 WF / 1 HF
2035	Technical Support	Manager, Engineering	6	4 WM / 1 WF / 1 BF
3000	International Division	SVP Division Executive	4	4 WM
3000	International Division	VP Division Sales	3	3 WF
3005	International Finance	Dir, Finance & Venture Planning	3	1 HM / 2 HF
3005	International Finance	International Controller	3	3 AF
3005	International Finance	Program Director	3	1 HM / 2 HF
3005	International Finance	VP Finance - International	3	3 WM
3010	Latin America Region	Program Director	6	2 HM / 4 HF
3015	Asia & Europe Region	Program Dir - Int I Vntres	3	1 WM / 1 WF / 1 BF
	* =			

Legend for sample data:

F – Female

M – Male

A – Asian

B – Black

H – Hispanic

W – White



Annotated Employee List by Department



The *Annotated Employee List by Department* shows the employee relationship to the AAP location, when the employee works at another location or reports to another location.

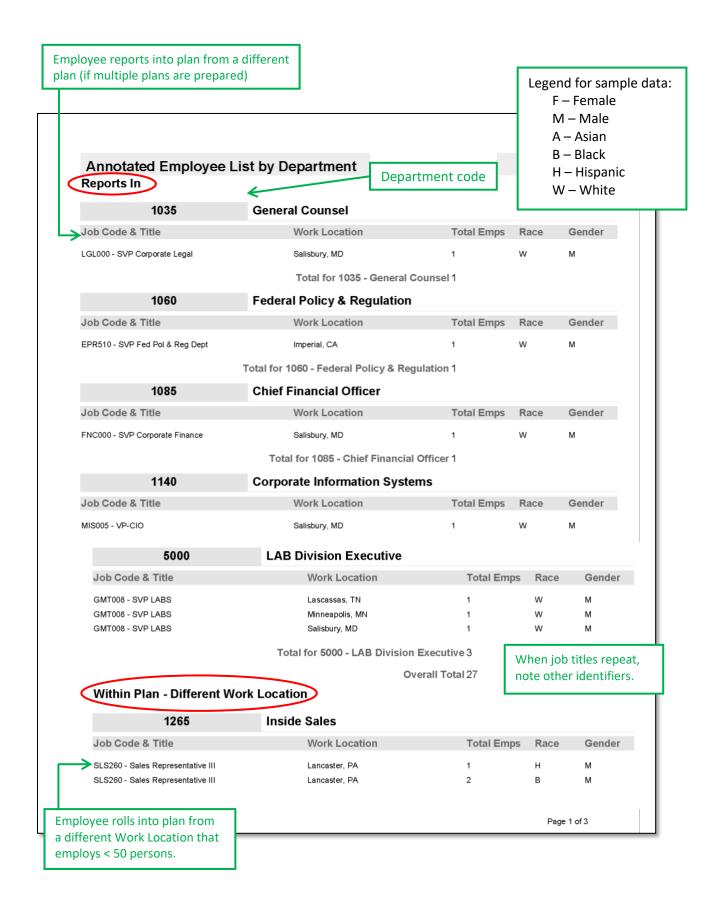
Regulatory Guidance – The regulations state that each employee must be included in the affirmative action program of the establishment at which he or she works, except that:

- Employees who work at establishments other than that of the manager to whom they report must be included in the affirmative action program of their manager ("Reports In/Out").
- Employees who work at an establishment, where the contractor employs fewer than 50 employees, may be included under any of the following three options:
 - 1. In an affirmative action program for only that establishment.
 - 2. In the affirmative action program for the location of the personnel function that supports the establishment ["Within Plan Different Location"].
 - 3. In the affirmative action program for the location of the official to whom they report ["Within Plan Different Location"].
- Employees for whom selection decisions are made at a higher level establishment within the organization must be included in the affirmative action program of the establishment where the selection decisions are made ["Reports In/Out"].
 - o If an employee "reports <u>in</u>," the organizational profile and Job Group Analysis of the plan in which the employee is included must be annotated to identify <u>the actual location of the employee</u>.
 - If an employee "reports <u>out</u>," the organizational profile and Job Group Analysis of the physical location must be annotated to identify <u>the plan in which the employee is</u> included.

Category Definitions:

- **Reports In** (Master Plan set) A list of employees who work at another plan location, but report into the plan. These employees will be included in the plan's analyses.
- Reports Out (Master Plan set) A list of employees who work at the plan location, but report to a manager at another location. These employees will be included in the other location's plan.
- Within Plan Different Work Location A list of employees who are rolled into the plan location and plan analyses because they work at another location having < 50 employees.

- <u>Job Group Analysis</u>
- Workforce Analysis
- Organizational Display
- Annotated Employee List by Job Group





Employment Report Settings

Job Group Analysis

- Show Percentages (default)
- Include Grade
- Insert Page Breaks between Job Groups (default)

Job Group Analysis



The *Job Group Analysis* report details the following information for each job group:

- Job codes/job titles in each job group
- Number of employees in each job code/job title
- Number and percentage of minorities and females in each job code/job title*
- Total number of employees in the job group
- Total number and percentage of minorities and females in the job group*

Regulatory Guidance on the Definition of Job Group – For AAP purposes, analysis on your organization's workforce is performed by job group. Each job group is comprised of jobs that share:

- EEO category
- Similar wages
- Similar job duties and responsibilities
- Similar opportunities for training, promotion, transfer, and other employment benefits

Job Group Analysis Summary

Option: BalanceAAP also offers an alternative summary report: Job Group Analysis by EEO Code.

The companion summary report supplements the above analysis by outlining the following information:

- Number of employees in each job group
- Number and percentage of minorities and females in each job group*
- Total number of employees in all job groups
- Total number and percentage of minorities and females in all job groups*

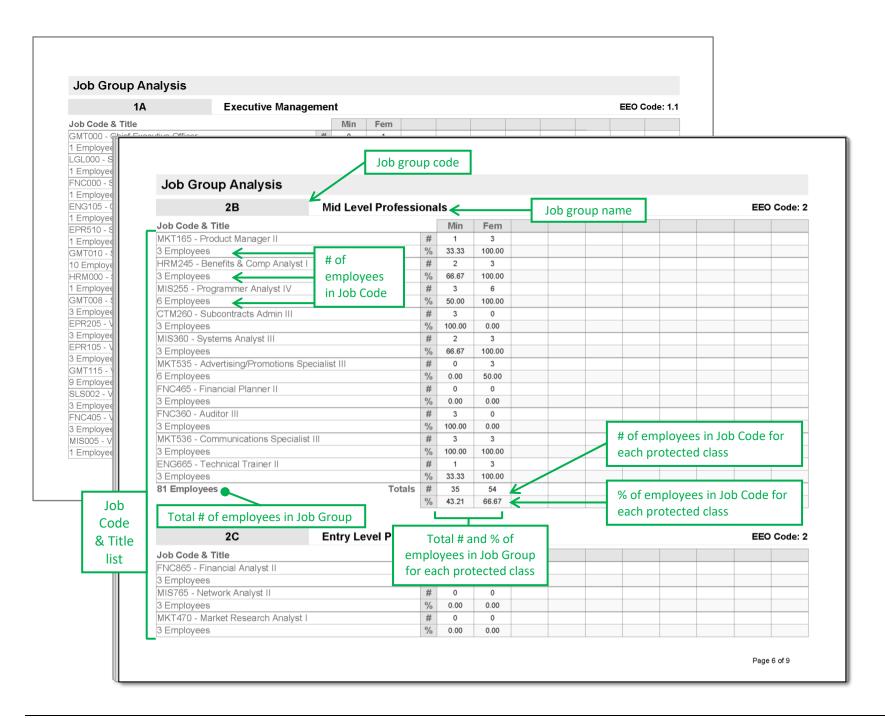
In additional to running the *Job Group Analysis* and *Job Group Analysis Summary* for Total Minorities, both reports can be run, based on settings for Protected Classes:

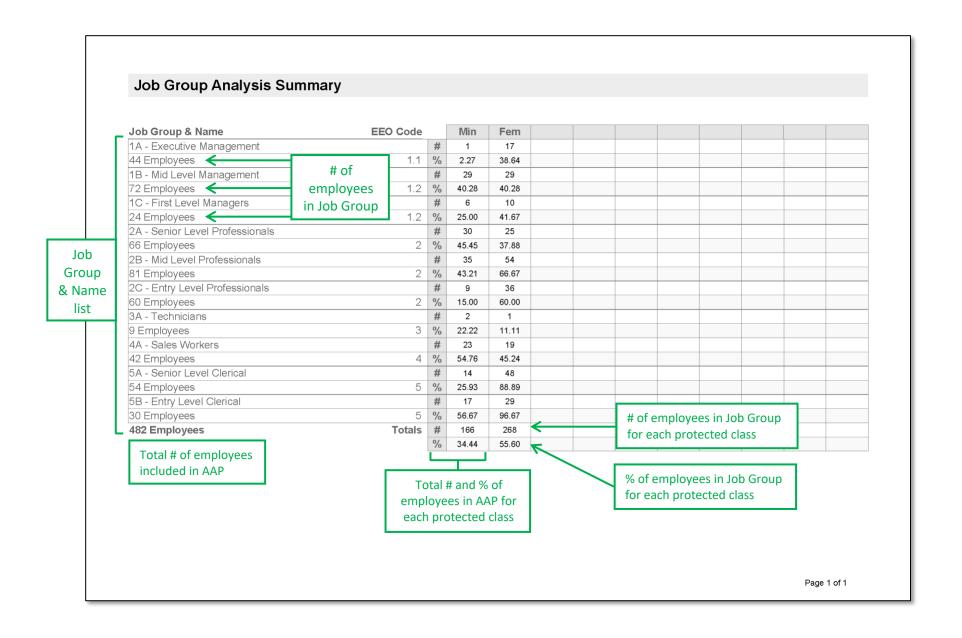
- Female
- Asian
- Black or African American
- Hispanic or Latino
- American Indian or Alaska Native

- Female
- Native Hawaiian or Other Pacific Islander
- Two or More Races
- White
- Male

Client's Guide to AAP Reports berkshire 19

^{*}Percentage is determined by dividing the number of employees in a protected class by the number of employees in the job group.



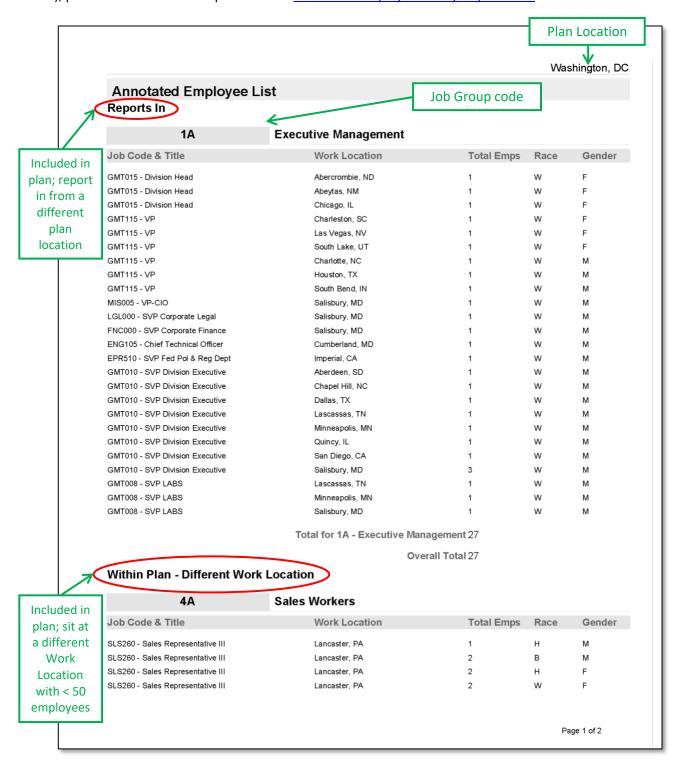




Annotated Employee List by Job Group



This version of the *Annotated Employee List* organizes annotated employees by job group. (For information on the regulations, pertaining to how employees are annotated (and the definitions shown below), please refer to the description for the *Annotated Employee List by Department*.



Availability/Utilization Report Settings:

Incumbency vs. Estimated Availability

- Include Statistical Values (default)
- Include Shortfall
- Highlight Problem Areas (default)

Census Code Assignments - Show Only Staffed Jobs (default)

Availability Factor Computation Form - Insert Page Breaks between Job Groups (default)

Placement Goals - Show Yes/No instead of Availability Percent

Availability Factor Computation Form



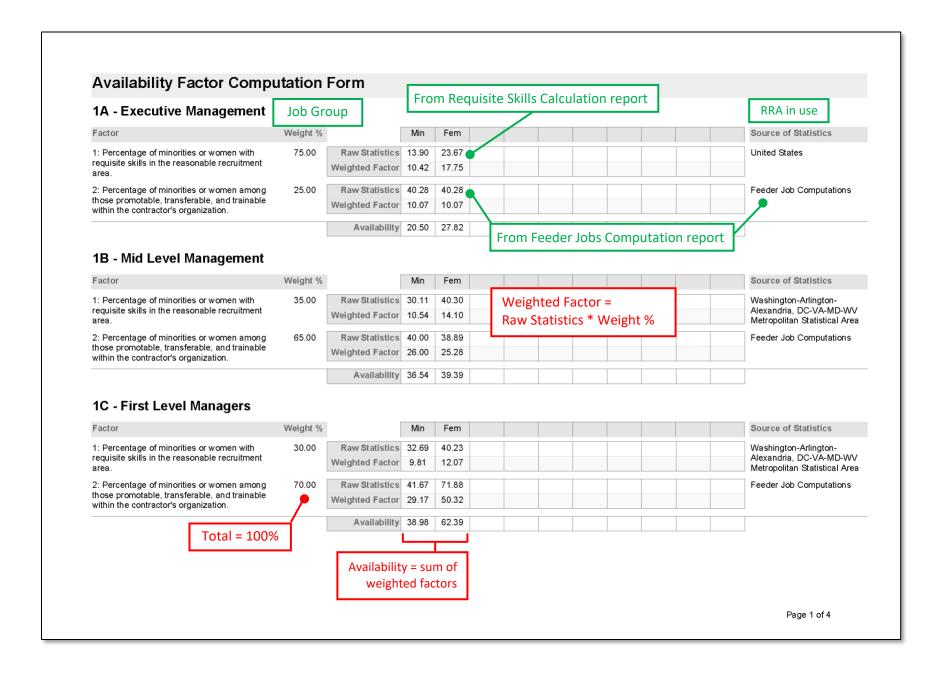
The *Availability Factor Computation Form* breaks down the two factors that comprise the Availability calculation:

- Factor 1: External Availability The percentage of minorities or women with the requisite skills in the reasonable recruitment area (RRA).
- **Factor 2: Internal Availability** The percentage of minorities or women among those promotable, transferable, and trainable within the organization.

The following information is included for each job group:

- Weight Percent (column) The percentage weight for each factor should reflect the organization's typical external versus internal ratio; and the total must equal 100%.
- Raw Statistics for Factor 1 (row) Raw statistics for Factor 1 are pulled from the Requisite Skills
 Calculations report. Census coding and appropriate RRA assignments should be complete before
 proceeding with the computation.
- Raw Statistics for Factor 2 (row) Raw statistics for Factor 2 are pulled from the <u>Feeder Job</u>
 <u>Computations</u> report to reflect the numbers of minorities and females currently employed in feeder jobs internally.
- Weighted Factor for Factors 1 and 2 (rows) The weighted factor is calculated by multiplying the raw statistics by the weight percent assigned to the factor.
- Overall Availability Overall availability for minorities and women for the job group is the sum of the weighted data for Factors 1 and 2.

- Requisite Skills Calculations
- Feeder Job Calculations



Availability

Incumbency vs. Estimated Availability



The *Incumbency vs. Estimated Availability* report shows the comparison of the employment percentage of minorities and females to the estimated availability percentage of minorities and females for each job group.

Regulatory Guidance – Federal contractors are required to determine whether minorities and females are being employed, or utilized, at a rate that would be expected, based upon their availability for employment. When the percentage of minorities or women employed in a job group is less than what would reasonably be expected, a goal for utilization is established.

Utilization Rule – When comparing employment to estimated availability, there are five different utilization rules to choose from:

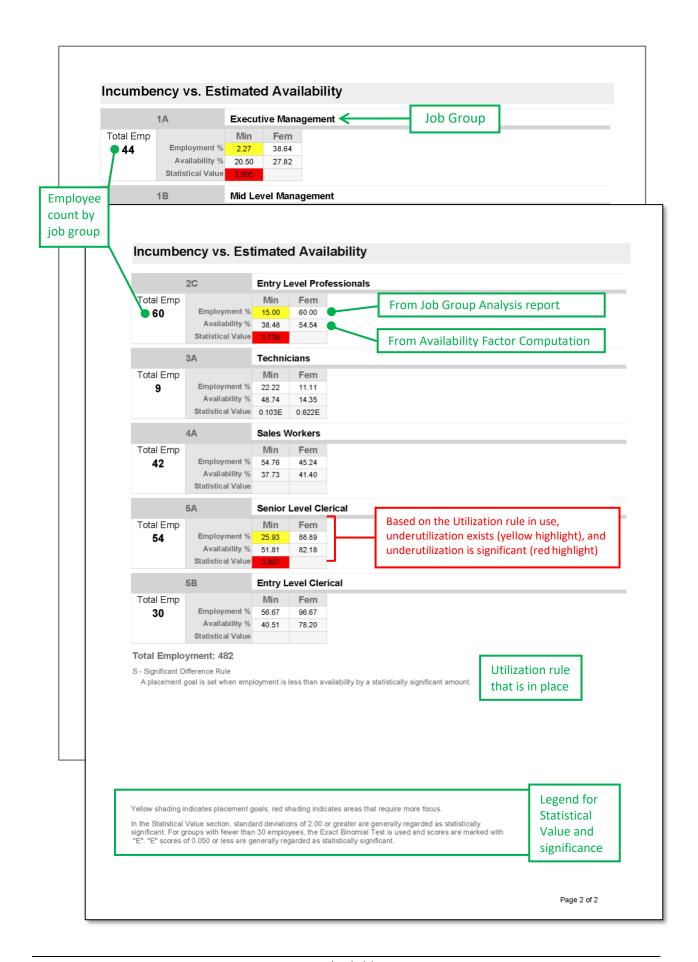
Utilization Rule	A placement goal is declared when employment is less than-
Any Difference	-availability, regardless of the size of the difference
Whole Person	-availability by at least one whole person
Eighty Percent	-80% of availability
Eighty Percent/ Whole Person	-80% of the availability by one whole person or more
Significant Difference	-availability by a statistically significant amount

Quick Tip: The Utilization rule can be set by plan or job group on balanceAAP's Availability>Factor Weights page.

The Incumbency vs. Estimated Availability report includes the following information:

- Employment percentage of minorities and females in each job group. (Groups highlighted in yellow are underutilized.)
- Estimated availability percentage of minorities and females in each job group.
- Statistical significance of areas of underrepresentation (Groups highlighted in red indicate the underutilization is statistically significant.)
- The Utilization rule used to calculate underrepresentation.

- Job Group Analysis
- Availability Factor Computation Form



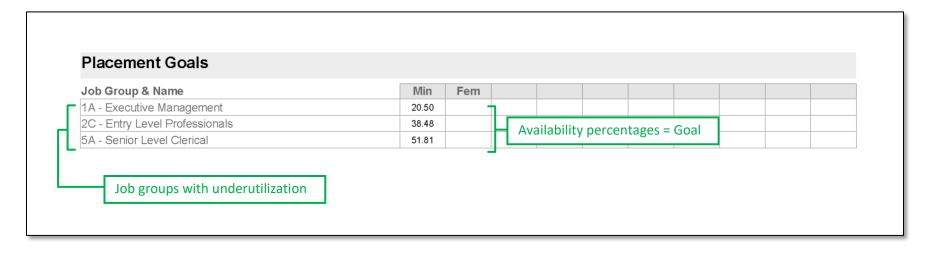


Placement Goals

The *Placement Goals* report will help your organization hone in on what levels of employment are needed to remedy the underutilization of females or minorities in job groups where it has been found. The placement goal for each relevant job group is shown at the estimated availability percentage.

Related Report

• Incumbency vs. Estimated Availability







Goal Attainment

Serving as a key Affirmative Action assessment, the *Goal Attainment* report details progress made towards meeting goals for minority or female placements, as set in the prior year's AAP. Accordingly, this report is limited to those job groups for which a placement goal was set in the prior annual AAP. As the starting point (or first row), the "Prior Year Goal" is presented as a percentage figure, based on the estimated availability of minorities or females, respectively.

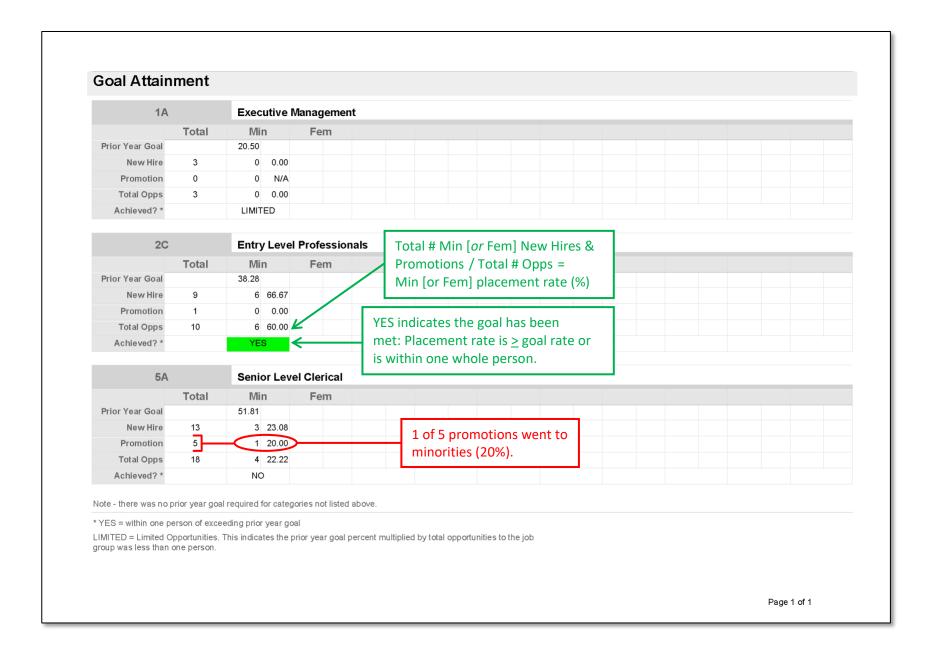
Progress is then determined by comparing the number of placement opportunities for minorities or females to the number of opportunities ("Opps") for the job group. Results are presented for the positive placement actions of "New Hire" and "Promotion" individually and when both are combined ("Total Opps"). Based on the combined job group results, the "Achieved?" row will indicate one of the following flags:

YES — Goal is met (within one whole person).

NO — Percentage of total opportunities received by minorities/females is less than the "Goal %" by more than one whole person.

LIMITED — The Prior Year Goal (%), multiplied by total placement opportunities for the job group, was less than one person.

NO OPPS — No placement opportunities occurred during the current reporting period.





Report Settings:

Applicant Summary

- Show Offers (default)
- Show Unsuccessful

Applicant Summary by Disposition Code – Run By Job Group

Regulatory Guidance – For accuracy, reports displaying the demographic statistics of your organization's workforce by personnel action should accurately reflect the governing plan's Personnel Action date range, which covers the 12 months prior to the plan date.

To ensure these reports reflect the proper data, check the relevant data table to see if the necessary dates (e.g., hire date, promotion date) were included; and then run a File Consistency check to make sure the dates fall within the correct range.

Applicant Summary

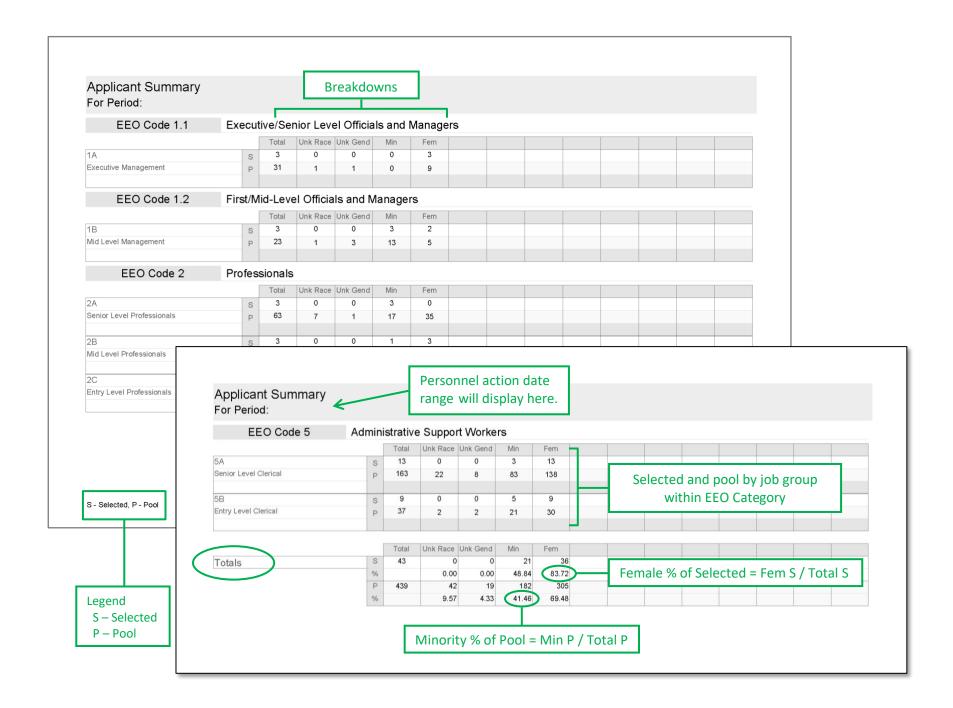


For each job group, the *Applicant Summary* shows the number of applicants selected out of the number of applicants in the applicant pool, as well as breakdowns by race and gender. Data should reflect only those applicants who were considered during the Personnel Action date range.

The *Applicant Summary* displays data by EEO Code. Results are shown for the number of selected applicants (S) and the number of applicants in the pool (P) by these breakdowns:

- Total
- Unknown Race
- Unknown Gender
- Minority
- Female

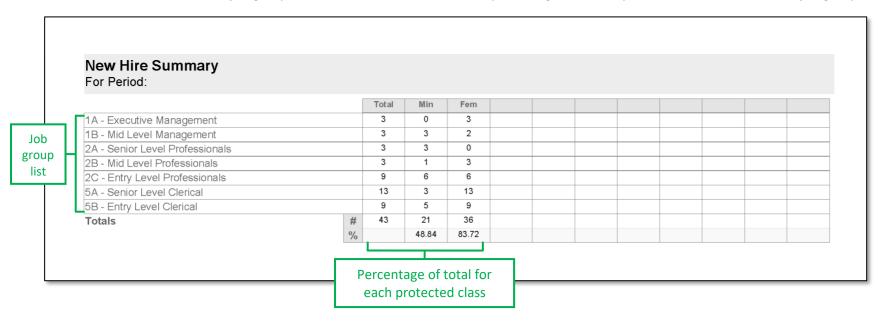
At the end of the report, numbers are combined into totals and percentages for each breakdown.





New Hire Summary

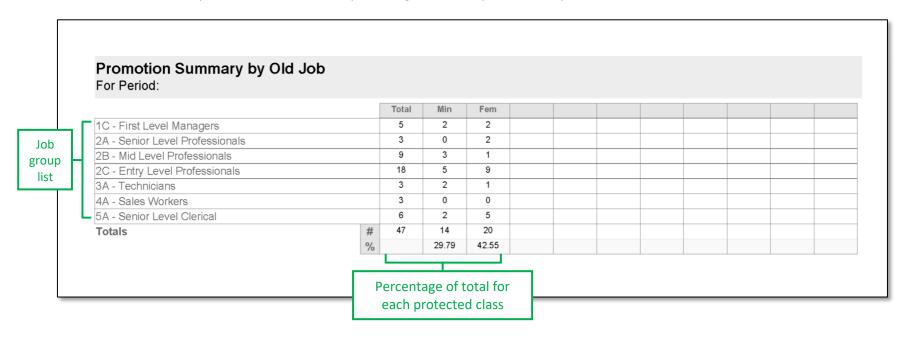
For each job group, the *New Hire Summary* displays the number of new hires, minority new hires, and female new hires. Additionally, it includes the total number of new hires for all job groups, as well as the total number and percentage of minority and female new hires for all job groups.



Promotion Summary by Old Job



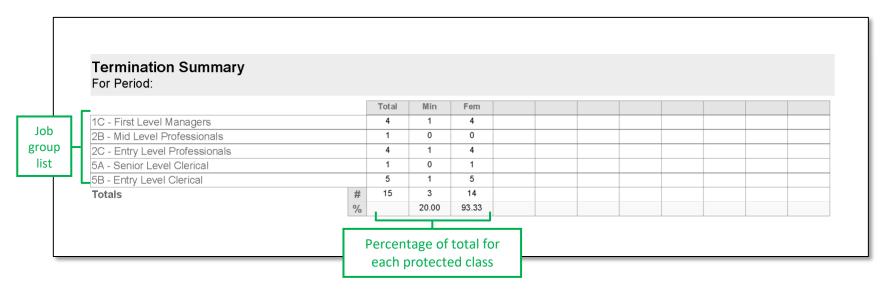
The *Promotion Summary by Old Job* presents information on employees whose promotions moved them within a job group or between different job groups. For each job group that a promoted employee moved <u>from</u>, the report displays the number of promotions for All, Minorities, and Females. Totals for number of promotions and number/percentage of minority and female promotions are also included.



Termination Summary



For each job group, the *Termination Summary* shows the number of terminations — including voluntary and involuntary — and the number of minority and female terminations. The report also displays the total number of terminations for all job groups, as well as the total number and percentage of minority and female terminations for all job groups.





Utilization

Availability/Utilization Report Settings (where applicable):

Incumbency vs. Estimated Availability

- Include Statistical Values (default)
- Include Shortfall
- Highlight Problem Areas (default)

Census Code Assignments - Show Only Staffed Jobs (default)

Availability Factor Computation Form - Insert Page Breaks between Job Groups (default)

Placement Goals - Show Yes/No instead of Availability Percent

Requisite Skills Calculations

Results from the *Requisite Skills Calculations* report are needed to calculate external availability. External availability is one of two factors used to estimate how many minorities and females with the appropriate skills are available for jobs at your organization.

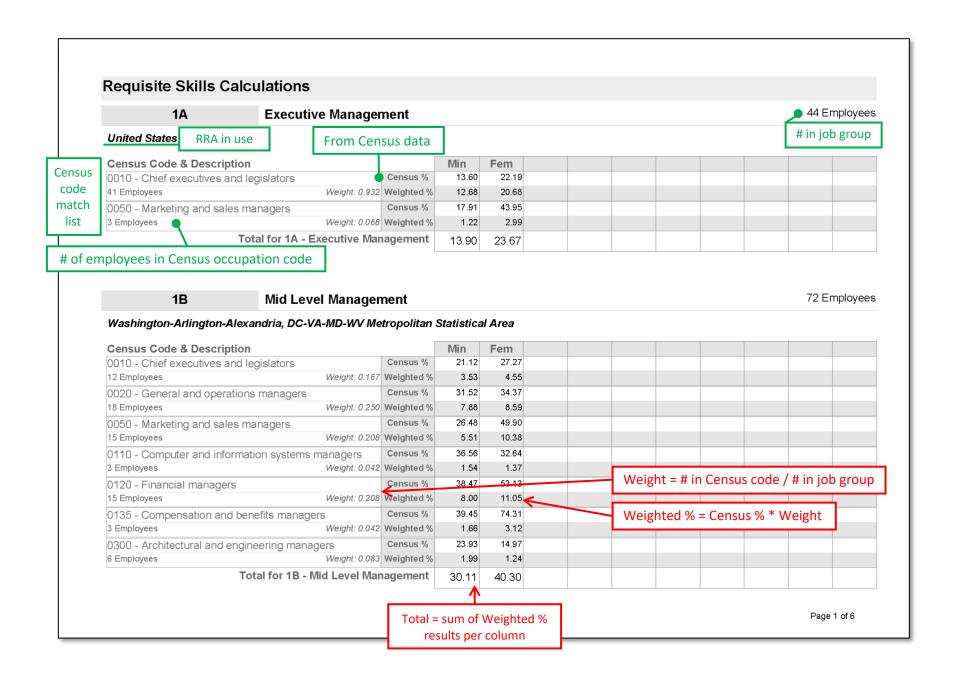
The following results can be found on this report:

- All Census codes and descriptions matched to job codes by job group
- Number of employees assigned to each Census code
- Total number of employees in the job group
- For each Census code used, the percentage of minorities and females ("Census %") in the reasonable recruitment area (RRA)
- "Weight" for each Census code*
- "Weighted %" of minorities and females with the requisite skills available in the reasonable recruitment area. (This determines the Raw Statistics for external availability.)*

*How Calculations are Performed

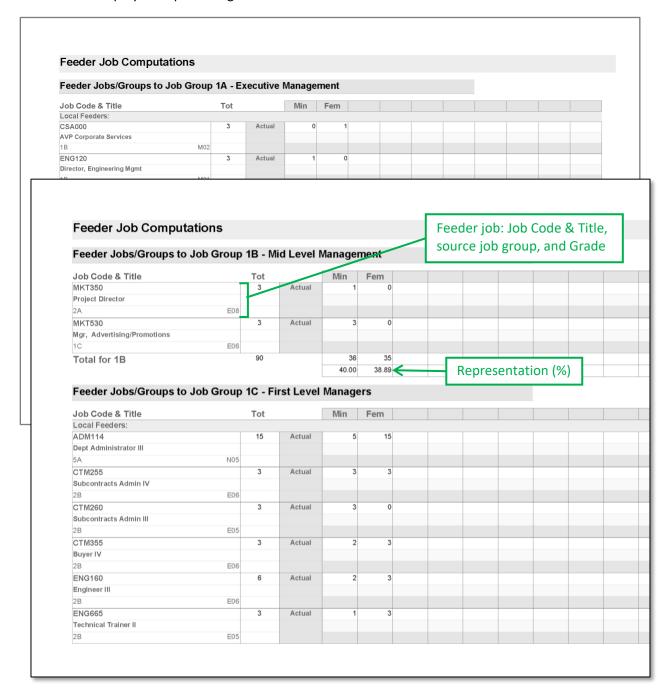
- 1. The system pulls Census data by:
 - a. Matching Census occupation codes to the job group
 - b. Pulling Census data on minorities and females with the requisite skills in the RRA. The result, in percent, is shown in the "Census %" column.
- 2. The number of employees in the job group is divided by the number of employees assigned to each Census code, resulting in its "Weight".
- 3. The "Census %" is then multiplied by the "Weight" to garner the "Weighted %"; this result represents the external availability percentage of minorities and females with the requisite skills available for each Census code.
- 4. The "Total" weighted percentage of minorities and females in the job group is determined by adding every "Weighted %" result. This grand total will be transposed to the *Availability Factor Computation Form* under "Raw Statistics" for "Factor 1".

- Availability Factor Computation Form
- Incumbency vs. Estimated Availability



Feeder Job Calculations

The Feeder Job Calculations report summarizes counts for minorities and females in your organization's "feeder" pools, by each feeder's job code, title, and job group. Then, the minority and female representation numbers for each job group are divided by the Total number of employees in the group to obtain an employment percentage.

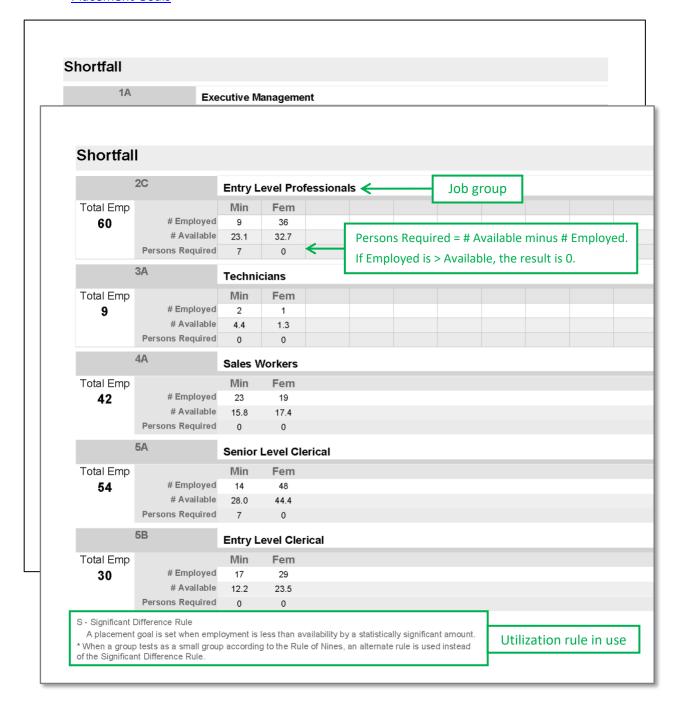


Shortfall

While the *Incumbency vs. Estimated Availability* report compares the employment and the estimated availability in percentages, *Shortfall* is <u>the number of persons</u> required to remove the placement goal, depending, of course, on Utilization rule.

Related Report

- Incumbency vs. Estimated Availability
- Placement Goals



Availability Worksheet

The Availability Worksheet provides an overview of external and internal availability as applied in the plan. The following information is provided:

- Job Group
- Job Group Name
- Reasonable Recruitment Area
- Are feeders assigned to this job group? (Yes or no)
- % Weight that Should be Placed on Feeders [versus external availability (If a feeder is assigned, and the user applies the system's recommendation.)

The definition of a Reasonable Recruitment area is listed on the report, as well as an explanation of how the system recommends feeder weights.

Availa	bility Worksheet					
Job Group	Job Group Name	Reasonable Recruitment Area*		ers assigned b group? **	% Weight That Placed on Fee	
1A	Executive Management	United States	YES			25.00
1B	Mid Level Management	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- YES			65.00
1C	First Level Managers	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- YES			70.00
2A	Senior Level Professionals	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- YES			20.00
2B	Mid Level Professionals	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- YES			20.00
2C	Entry Level Professionals	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- YES			10.00
3A	Technicians	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- NO			0.00
4A	Sales Workers	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- NO		y-level is typically	0.0
5A	Senior Level Clerical	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- YES	•	feeders	25.00
5B	Entry Level Clerical	Washington-Arlington-Alexandria, DC-V MD-WV Metropolitan Statistical Area	A- NO			0.00

^{*} The Reasonable Recruitment Area is the geographical area which your company targets in recruiting for that particular Job Group. In determining this area, you might want to consider what publications you would use to advertise job openings (e.g. the Washington Post), from what schools you would recruit, and from where some of your current employees in that Job Group come. This area can consist of large cities or metropolitan areas, counties, states (or parts of states), or combinations of these. If using a combination of areas be sure to specify the percent weight on each area (e.g. 40% Chicago, IL MSA and 60% U.S.). Different EEO categories might encompass more or less geographic diversity. For example, your EEO 1 category job group(s) might include the U.S., but the EEO 5 category job group(s) might only include the local area. When trying to establish the geographic recruitment area, the areas should include where the company is physically located and should be consistent with current recruiting practices.

^{**} The "% Weight That Should be Placed on Feeders" is the approximate percentage weight you want to place on the number of entrants to each job group that comes from the internal feeder positions you identified in the job group analysis versus external hires. For example, if you identified five feeder positions that feed into Job Group 1 and 50% of the time you fill open positions in Job Group 1 with someone in the feeder positions, then the "% Weight That Should be Placed on Feeders" should be 50%. This is just a best guess -- we don't need actual data to calculate it. If you have not identified feeders into a particular job group, then the "% Weight That Should be Placed on Feeders" should be listed as zero. When considering how much weight to put on feeders or internal availability, remember the remainder of the weight will be placed on external availability or your reasonable recruitment area.

Recruitment Area Composition

The *Recruitment Area Composition* report offers an easy-to-read summary, showing how areas have been composed. For plan preparers who have developed recruitment areas by job group (and across multiple plans, if applicable) to account for targeted recruiting strategies, this report may serve as a helpful reference.

If an area is comprised of multiple regions, the "Region %" will indicate the weighting applied to the component regions.

ecruitment Area C	omposition		
1A	Executive Management	Region %	44
United States			
United States		100.00	
1B	Mid Level Management	Region %	72
Larger Metro DC			
Washington-Arlington-Al	exandria, DC-VA-MD-WW Metropolitan Statistical Area	60.00	
Maryland		10.00	
Pennsylvania		10.00	
Virginia		10.00	
Delaware		5.00	
West Virginia		5.00	
1C	First Level Managers	Region %	24
Washington-Arlington	on-Alexandria, DC-VA-MD-WV Metropolitan Statistic	cal Area	
Washington-Arlington-Alex	xandria, DC-VA-MD-WV Metropolitan Statistical Area	100.00	
2A	Senior Level Professionals	Region %	66
Washington-Arlington	on-Alexandria, DC-VA-MD-WV Metropolitan Statistic	cal Area	
Washington-Arlington-Alex	kandria, DC-VA-MD-WV Metropolitan Statistical Area	100.00	
2B	Mid Level Professionals	Region %	81
Washington-Arlington	on-Alexandria, DC-VA-MD-WV Metropolitan Statistic	cal Area	
Washington-Arlington-Alex	kandria, DC-VA-MD-WV Metropolitan Statistical Area	100.00	
2C	Entry Level Professionals	Region %	60
Washington-Arlington	on-Alexandria, DC-VA-MD-WV Metropolitan Statistic	cal Area	
Washington-Arlington-Alex	xandria, DC-VA-MD-WV Metropolitan Statistical Area	100.00	
3A	Technicians	Region %	9
Washington-Arlington	on-Alexandria, DC-VA-MD-WV Metropolitan Statistic	cal Area	
Washington-Arlington-Alex	kandria, DC-VA-MD-WV Metropolitan Statistical Area	100.00	
4A	Sales Workers	Region %	42
Washington-Arlington	on-Alexandria, DC-VA-MD-WV Metropolitan Statistic	cal Area	
Washington-Arlington-Alex	kandria, DC-VA-MD-WV Metropolitan Statistical Area	100.00	
5A	Senior Level Clerical	Region %	54
Washington-Arlington	on-Alexandria, DC-VA-MD-WV Metropolitan Statistic	cal Area	
			Number
			employe
			l employe

IWD/Veterans

Killings: IWD/Veterans Report Settings:

All Reports – Run By Plan (default) OR Run By Job Group

Individuals with Disabilities Utilization Goals

- Show Statistical Value (optional)
- Determine Dynamically by Roster count (default)

Veteran Benchmarks for Hiring Analysis – Suppress Benchmark Met

Data Collection Analysis for Individuals with Disabilities

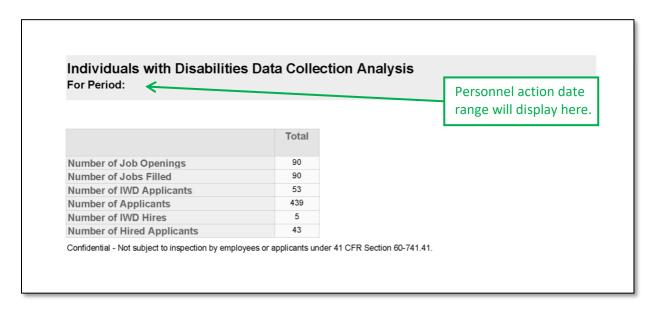


The *Data Collection for Individuals with Disabilities* (IWD) report provides the following statistics, or the number of:

- Job Openings
- Jobs Filled
- IWD Applicants
- Applicants
- IWD Hires
- Hired Applicants

Related Report:

Individuals with Disabilities Utilization Goals



IWD/Veterans

Data Collection Analysis for Protected Veterans



The Data Collection for Protected Veterans report provides the following statistics, or the number of:

- Job Openings
- Jobs Filled
- Protected Veteran Applicants
- Applicants
- Protected Veteran Hires
- Hired Applicants

Regulatory Guidance – Results of the data collection for individuals with disabilities and protected Veterans are not subject to inspection by employees/applicants.

Related Report:

• Veterans Benchmarks for Hiring Analysis

Veterans Data Collection Analysis For Period:

	Total
Number of Job Openings	90
Number of Jobs Filled	90
Number of Protected Veteran Applicants	50
Number of Applicants	439
Number of Protected Veteran Hires	4
Number of Hired Applicants	43

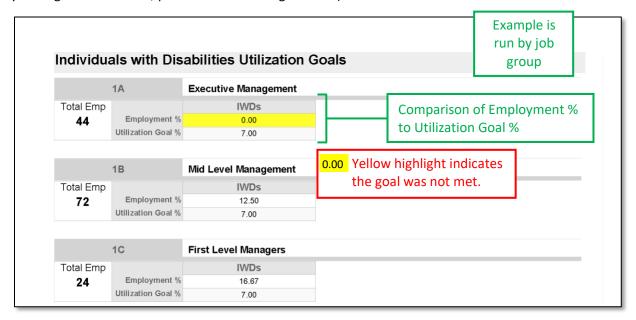
Confidential - Not subject to inspection by employees or applicants under 41 CFR Section 60-300.41.



Individuals with Disabilities Utilization Goals



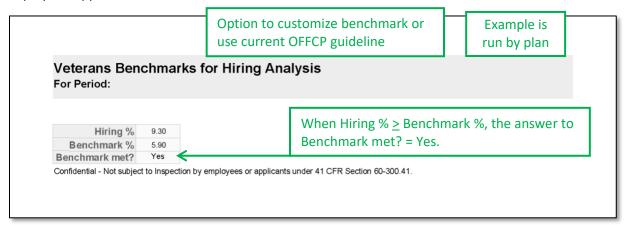
Because IWD status for an employee may change over time, the *Individuals with Disabilities Utilization Goals* report (shown below, top) examines Roster data, comparing the Employment % with the Utilization Goal %. (Requirements to run IWD reports by Job Group or Plan are specific and based on your organization's size; please review the regulations.)



Veterans Benchmarks for Hiring Analysis

By counting protected Veterans among applicants with hired disposition codes, the *Veterans Benchmarks for Hiring Analyses* report (shown below, bottom) compares Hiring % to Benchmark %, by plan (standard option) or job group.

Regulatory Guidance – Results of IWD and Veteran analyses are not subject to inspection by employees/applicants.



Related Reports:

- Data Collection Analysis for Individuals with Disabilities
- Data Collection Analysis for Protected Veterans

Client's Guide to AAP Reports berkshire 43

Adverse Impact

Adverse Impact Report Settings:

All Reports

- Highlight Problem Areas (default)
- Run reports by: Job Group (default), EEO Code, OR Job Code
- When available, run Adverse Impact by Pool ID
- Show the following data on the report:
 - Adverse IRA (default)
 - Selection Ratio (default)
 - Statistical Value (default)
 - Statistically Significant (default)
 - Swaps
 - o Adjusted Selection Ratio
 - Swaps For Significance
 - Adjusted Statistical Value
 - Shortfall (default)
 - o Selection Rate
 - o Overall Selection Rate
- Display:
 - Suppress Excluded Disposition Code Footnotes (default)
 - o Suppress Favored Group Information for Detail Reports

Adverse Impact for IWDs / Adverse Impact for Protected Veterans

• Run By Plan (default) OR Run By Job Group

Introduction to the Adverse Impact Report Group

Summary and detail reports on Adverse Impact will help your organization identify potential problem areas in selection rates for the following personnel actions:

- Applicants (and Applicants by Requisition Number, not shown)
- Promotions
- Transfers (not shown)
- Terminations
- Voluntary and/or Involuntary Terminations (optional, not shown)

The reports are divided into sections for the following classes:

- By Individual Race/Ethnicity
- Total Minorities vs. Whites
- By Gender

It may be helpful to begin by reviewing the *Detail for (Personnel Action)* because it will provide the underlying breakdown of the class selection and pool numbers by job group, including Grand Totals. As the vehicle for analysis results, the *Adverse Impact* report flags potential problem areas, using adverse impact ratio analysis (adverse IRA) by favored group and testing for statistical significance.

For each job group, the Favored Group is identified on the right-hand side of the header. Accordingly, the column for the Favored Group in the comparison will be blank. For more information, please review information on the next page, regarding how the calculations are performed.

Adverse Impact reports are also available for Individuals with Disabilities and Protected Veterans.



Calculating Adverse Impact Ratio Analysis by Favored Group

Using the "4/5ths Selection" rule, the non-favored group is compared with the favored group to determine if an employment practice results in a negative consequence more often for members of the non-favored group than for members of the favored group. Two calculations are performed: Adverse IRA analysis by favored group and statistical significance testing.

Positive Employment Actions

For a positive employment action, such as the hiring of applicants** (or the promotion of employees), the favored group is the class whose members are chosen at the highest rate.

**Please note that Applicants can choose to not self-identify — those with missing gender and/or race information will not be included in the corresponding analysis.

Conducting Impact Ratio Analysis

First, for each class, the number selected is divided by the pool number to determine the selection rate. Next, the non-favored selection rate is divided by the favored selection rate (and converted into a percentage). If the result of this calculation is less than 80%, the personnel action is flagged as having adverse IRA.

Calculating Statistical Significance

The non-favored selection rate is compared to the favored selection rate, using an appropriate statistical test, based on group size. For groups of 30 or more, the formula is as follows:

Favored-group selection rate minus non-favored-group selection rate divided by the square root of (overall selection rate * (1-overall selection rate) * ((1/total favored) + (1/total non-favored)))

Differences in selection rates that are statistically significant are flagged.

Negative Employment Actions

For the negative employment action of termination, the favored group will be the one that has the lowest selection rate. A selection rate for the non-favored class that is less than 80% of the favored group's rate will be flagged. Again, a flag will also indicate if the difference in selection rate is statistically significant.

Conducting Impact Ratio Analysis

First, for each class, the number selected is divided by the pool number to determine the selection rate. Next, the favored selection rate is divided by the non-favored selection rate (and converted into a percentage). If the result of this calculation is less than 80%, the personnel action is flagged as having adverse IRA.

Calculating Statistical Significance

The non-favored selection rate is compared to the favored selection rate, using an appropriate statistical test, based on group size. For groups of 30 or more, the formula is as follows:

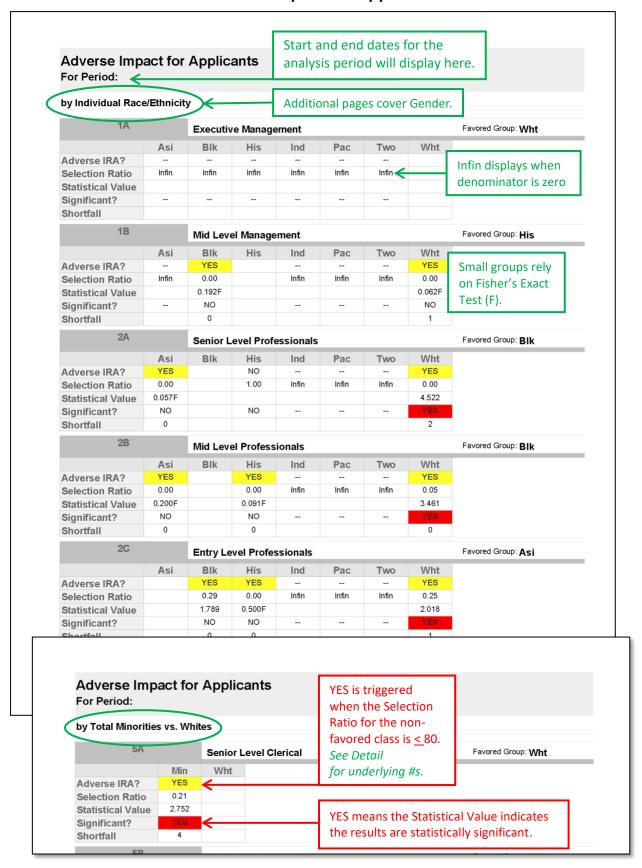
Non-favored-group selection rate minus favored-group selection rate divided by the square root of (overall selection rate * (1-overall selection rate) * ((1/total non-favored) + (1/total favored)))

Differences in selection rates that are statistically significant are flagged.

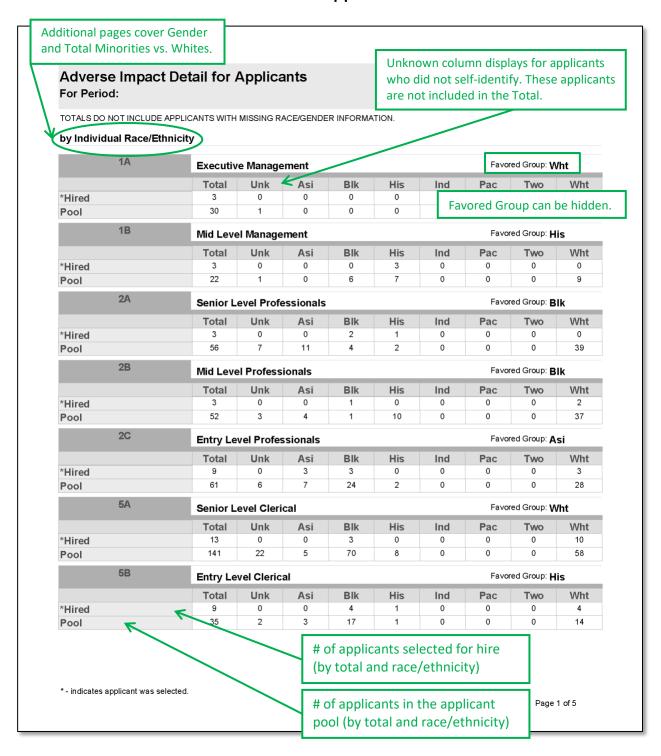
Tests for Statistical Significance

For large groups (>30), if the statistical value is 1.96 standard deviations or more, then adverse impact is considered statistically significant. Groups with <30 members will be labeled "F", indicating use of the Fisher's Exact test to determine statistical significance.

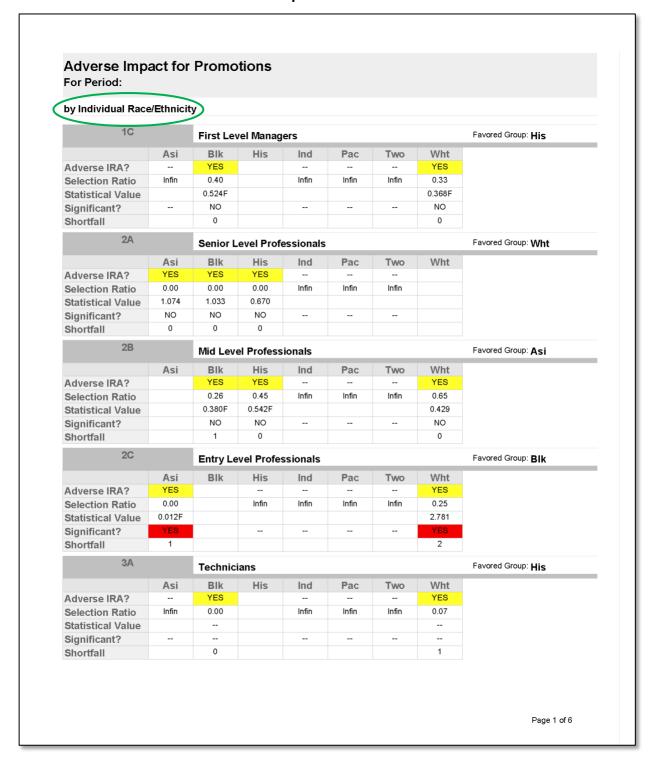
Adverse Impact for Applicants



Detail for Applicants



Adverse Impact for Promotions



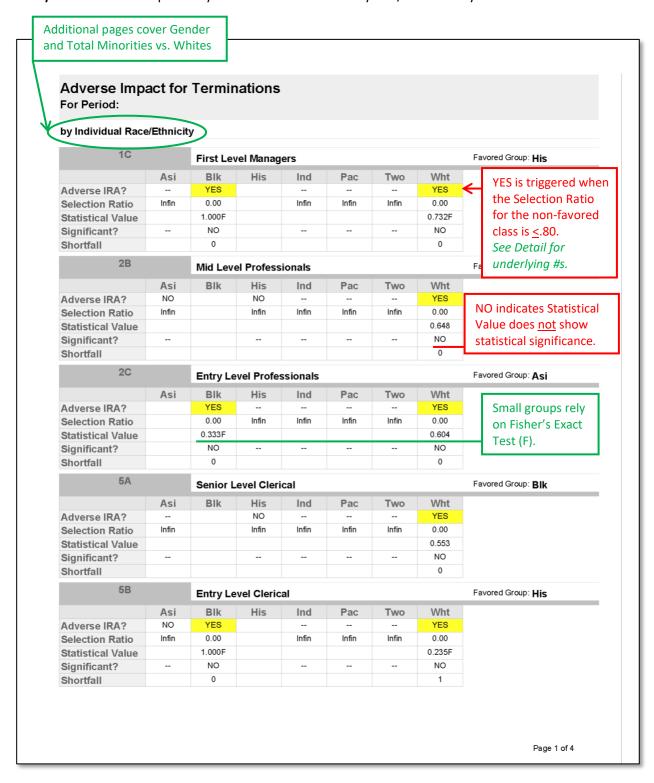
Detail for Promotions

y Individual Ra	ce/Ethnici	ty							
1C		First Le	vel Manag	ers				Favored	Group: His
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	5	0	1	1	0	0	0	3	
Pool	25	0	5	2	0	0	0	18	
2A		Senior L	evel Prof	essionals				Favored	Group: Wht
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	3	0	0	0	0	0	0	3	
Pool	66	13	12	5	0	0	0	36	
2B		Mid Lev	el Profess	ionals				Favored	Group: Asi
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	9	1	1	1	0	0	0	6	
Pool	81	5	19	11	0	0	0	46	
2C		Entry Le	Entry Level Professionals Favored Group: Blk						Group: Blk
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	18	0	3	2	0	0	0	13	
Pool	61	6	3	0	0	0	0	52	
3A		Technic	ians					Favored	Group: His
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	3	0	0	2	0	0	0	1	
Pool	9	0	1	1	0	0	0	7	
4A		Sales W	orkers					Favored	Group: Wht
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	3	0	0	0	0	0	0	3	
Pool	42	3	11	9	0	0	0	19	
5A		Senior L	evel Cler	ical				Favored	Group: Blk
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	6	0	2	0	0	0	0	4	
Pool	54	0	12	2	0	0	0	40	
Grand To	otals								
	Total	Asi	Blk	His	Ind	Pac	Two	Wht	
Selected	47	1	7	6	0	0	0	33	
Pool	338	27	63	30	0	0	0	218	

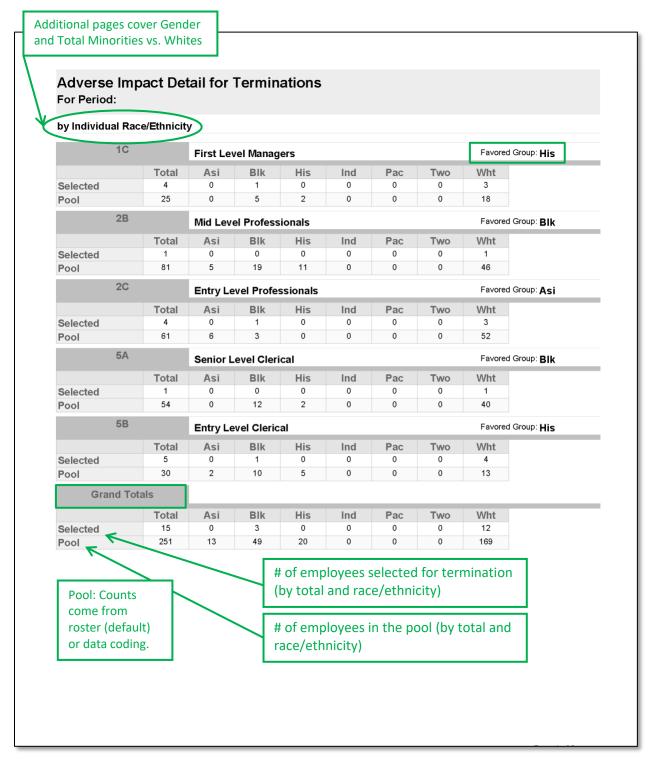
Client's Guide to AAP Reports berkshire 49

Adverse Impact for Terminations

Options: Adverse Impact may also be run on involuntary and/or voluntary terminations.



Detail for Terminations

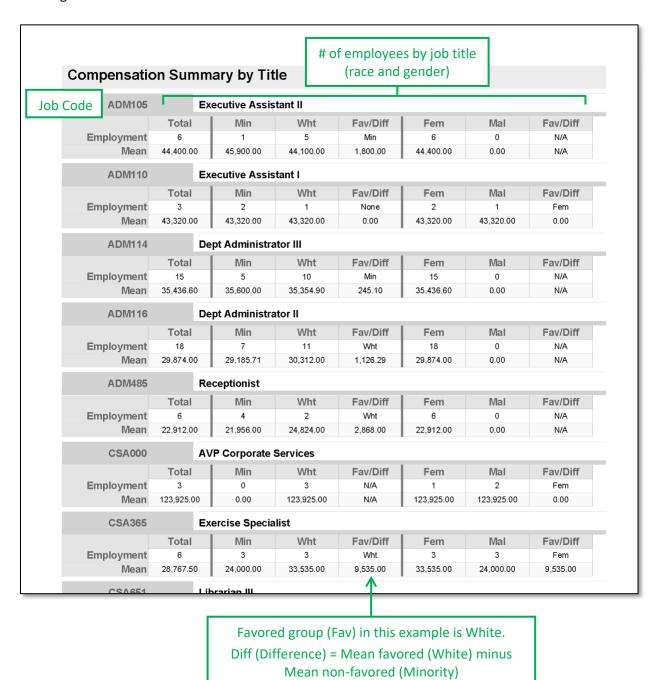




Compensation Summary by Title

Options: The Compensation Summary can be also be run by job group or grade.

The *Compensation Summary* summarizes the mean salaries of minorities and females, compared to those of non-minorities and males, respectively, for each job title (or other category). The (Fav) favored group is identified, along with the (Diff) difference between the mean of the favored group and the non-favored group. This report serves as an indicator of potential pay disparities that can guide further investigation.



Client's Guide to AAP Reports berkshire 52

REACH (Good Faith Efforts Tracking)

REACH Report Settings:

General

• Select date range to view reports by

Sources and Activities

- Filter By: No Filter (default), AAP Plan, Created By, Geographic Reach, Location, Recruiter OR Source
- For Selected Categories: Minorities, Females, Disabled, Veteran
- Group by: No Group (default), Category, Geographic Reach, Source OR Source Type

Evaluations

- Filter By: No Filter (default), AAP Plan, Plan Date, Source OR Target Category
- Sort By: Source (default); Created Date, then by Source; OR Created By, then by Source
- Evaluation Detail: Show all evaluations for a source separately (default) OR Average scores from all
 evaluations for a source



For clients who use Berkshire's **REACH** software to collect data on "Good Faith Efforts" (GFE), reports on information about your organization's recruiting activities may be reviewed prior to including data in AAP narratives. These reports may also provide valuable information for internal collaborators and stakeholders.

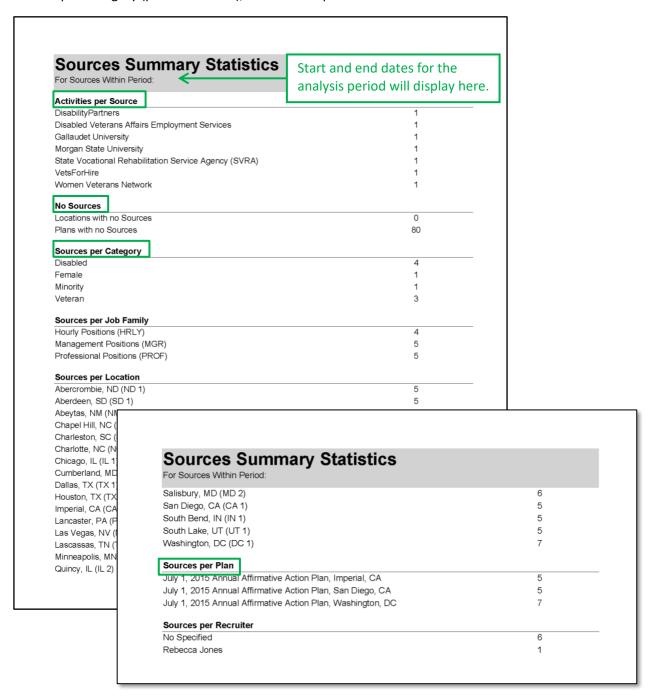
REACH reports are organized into the following categories:

- Sources
- Activities
- Evaluations



Sources Summary Statistics

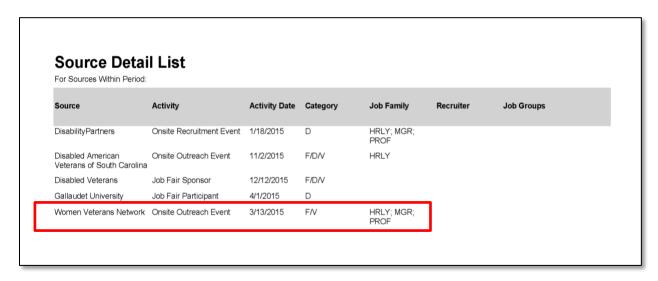
The *Sources Summary Statistics* report provides an overview of the data your organization has collected on recruiting Sources. Statistics are provided in areas, such as Activities per Source, No Sources, Sources per Category (protected class), and Sources per Plan.





Source Detail List

A complete list of your organization's recruiting sources to meet GFE requirements is compiled into the *Source Detail List*, by Source (name), Activity, Activity Date, Category, and other information.



Sample GFE Insertion in Minorities and Women Narrative

REACH's GFE data on Source and Activity by Category (protected class) are inserted into your organization's AAP, in the appropriate sections on action-oriented programs. Below are sample insertions into the narratives.

- We will continue to contact our normal sources of recruitment (e.g., State Employment) and advise them that under the AAP we are specifically seeking to employ minorities and/or women for job openings. During the period from July 01, 2018 to June 30, 2019, targeted recruitment activities were conducted at the following sources:
 - Minority Sources
 - Job Fair Participant, Morgan State University, JFP
 - Female Sources
 - Onsite Outreach Event, Women Veterans Network, OOE

The following lists the outreach programs ACME Enterprises participated in, from January 01, 2019 to December 31, 2019:

- DelMarVa Empowerment 4.4 (Excellent)
- Sith Academy 0.75 (Poor)
- We Hire Vets 4.8 (Excellent)
- Division of Blind Services
- Dress for Success
- Economic Development
- Los Medanos College



Evaluation Detail List

The Evaluation Detail List displays the full evaluations of Sources, as completed by your organization.

Evaluation Detail List

For Evaluations Within Period:

Source Name:	Evaluation Da	ate: Created By:
DisabilityPartners	07/01/2015	Clientservices@berkshireassociates.
Criteria Used	Score	Comments
Did the activities for this source during the evaluation period attract qualified applicants?	4.00	Yes, partnering with this group allowed our jobs to be posted on their site and communicated to their clients.
Did the activities for this source during the evaluation period result in hiring of qualified individuals?	3.50	We think some of our hires came from this group but can not be sure since the source in our ATS is not reliable.
Did the activities for this source during the evaluation period expand the organization's outreach to individuals?	5.00	They were a great organization to work with. Very professional and interested in helping us fill our jobs with the right people.
Did the activities for this source during the evaluation period increase the organization's capacity/capability to include individuals?	5.00	They were a great organization to work with. Very professional and interested in helping us fill our jobs with the right people.
List of Activities:	Activity Date	
ORE - Onsite Recruitment Event	01/18/2015	
Evaluation Results:		
Overall Ranking	4.38	
Overall Evaluation	Excellent	
Continue/Discontinue	Continue	

Evaluation Detail List

For Evaluations Within Period:

Source Name:	Evaluation Da	te: Created By:
Disabled Veterans Affairs Employment Services	07/01/2015	Clientservices@berkshireassociates.
Criteria Used	Score	Comments
Did the activities for this source during the evaluation period attract qualified applicants?	1.50	Not really. Many of the applicants from this source did not meet our minimum qualifications.
Did the activities for this source during the evaluation period result in hiring of qualified individuals?	1.50	Yes but only one.
Did the activities for this source during the evaluation period expand the organization's outreach to individuals?	5.00	Yes. Our emails reached over 2000 disabled veterans.
Did the activities for this source during the evaluation period increase the organization's capacity/capability to include individuals?	3.50	Yes.
List of Activities:	Activity Date	
JP Email - Sent Job Postings	07/01/2014	
Evaluation Results:		
Overall Ranking	2.88	
Overall Evaluation	Average	
Continue/Discontinue	Continue	

Exhibit A: Report and Audit Scheduling Letter/Regulations Crosswalk

The table is not intended to replace gaining a thorough understanding of OFCCP audit requirements and the specific audit situation, by referring to the regulations and consulting with a regulatory expert.

This exhibit matches up reports with the requirements in the establishment review Scheduling letter and the Code of Federal Regulations. The *Crosswalk to Itemized Listing* column corresponds to the item number in the Itemized listing of the Scheduling letter. In the *Crosswalk to Regulations* column, the Code of Federal Regulations section is listed that refers to the corresponding required report.

ITEM REQUEST	REPORT/SECTION IN AAP	CROSSWALK TO ITEMIZED LISTING	CROSSWALK TO REGULATIONS
EXECUTIIVE ORDER 11246			
Organizational Profile			
	Workforce Analysis OR	Item 1	CFR 60-2.11 (c)
	Organizational Display/Supervisor by Department	Item 1	CFR 60-2.11 (b)
	Annotated Employee List by Department (if applicable)	Item 1	CFR 60-2.1 (e)
Formation of Job Groups	Job Group Analysis	Item 2	CFR 60-2.12
	Annotated Employee List by Job Group (if applicable)	Item 2	CFR 60-2.12 (c)
Percentage of minority & female Incumbents	Job Group Analysis Summary	Item 3	CFR 60-2.13
Determination of minority & female Availability	Availability Factor Computation Form	Item 4	CFR 60-2.14(c) (1) and (2)
Comparison of Incumbency to Availability	Incumbency vs. Estimated Availability	Item 5	CFR 60-2.15
Placement goals by Job Group	Placement Goals	Item 6	CFR 60-2.16
SECTION 503			
Results of evaluation of effectiveness of outreach and recruitment efforts*	Tags [Current & Discontinued IWD Outreach Programs] provided in the IWD narrative to identify current and discontinued outreach programs. Customize Exhibit D – Annual Assessment of Outreach and Recruiting Efforts, as needed.	Item 7	CFR 60-741.44 (f)
Documentation of all actions taken to comply with Audit and Reporting System	Tag [Additional Monitoring Actions] provided in the IWD narrative to document any additional actions taken to comply with the audit and reporting system requirements. Customize Monitoring and Reporting Systems section, as needed.	Item 8	CFR 60-741.44 (h)
Documentation of the computations or comparisons of applicants and hires	Data Collection for Individuals with Disabilities	Item 9	CFR 60-741.44 (k)
Utilization analysis evaluating representation of IWDs by Job Group	Individuals with Disabilities Utilization Goals	Item 10	CFR 60-741.45

SECTION 4212 (VEVRAA)			
Results of evaluation of effectiveness of outreach and recruitment efforts*	Tags (Current & Discontinued Vets Outreach Programs) provided in the Veterans narrative to identify current and discontinued outreach programs. Customize Exhibit C – Annual Assessment of Outreach and Recruiting Efforts, as needed.	Item 11	CFR 60-300.44 (f)
Documentation of all actions taken to comply with Audit and Reporting System	Tag [Additional Monitoring Actions] provided in the Veterans narrative to document any additional actions taken to comply with the audit and reporting system requirements. Customize Monitoring and Reporting Systems section, as needed.	Item 12	CFR 60-300.44 (h)
Documentation of the computations or comparisons of applicants and hires	Data Collection for Veterans	Item 13	CFR 60-300.44 (k)
Documentation of hiring benchmark adopted	Benchmark used (either National Benchmark or Five Factor Benchmark) is included in the <i>Hiring Benchmark</i> section of the Veteran Narrative.	Item 14	CFR 60-300.45 (b) (2)
SUPPORT DATA			
Copy of EEO-1 report for 3 years		Item 15	
Copy of Collective Bargaining agreement		Item 16	
Information on Affirmative Action goals for the immediately preceding AAP year	Goal Attainment History Source Summary by Job Group	Item 17 a, b & c	CFR 60-2.17(b) and (d)
Data on employment activity		Item 18	
Applicants and hires	Adverse Impact Detail for Applicants	а	
Promotions	Adverse Impact Detail for Promotions	b	
Terminations	Adverse Impact Detail for Terminations	С	
Employee level compensation data		Item 19	
	Because this data must be submitted electronically to OFCCP, the information is available via data export. Data fields listed in the Scheduling letter are included by default; additional	a	
	information can be added.		
Additional factors used to determine compensation	Include at your discretion	b	
Documentation and policies, related to compensation practices	Include at your discretion	С	

Copies of Reasonable Accommodation policies and documentation of requests	Customize Exhibit C - Reasonable Accommodation Policy and Procedures in the IWD Narrative, or upload existing policy into this section of the Narrative.	Item 20	
	Documentations of accommodation requests should be included outside of the IWD Narrative.		
Recent assessment of personnel processes	Tag [Review of Personnel Processes Detail] provided in the IWD and Veterans Narrative to document information regarding date of last assessment, description of the review, changes or processes implemented, and/or date of next scheduled assessment. Customize 'Review of Personnel Processes' sections in both Narratives as needed.	Item 21	CFR 60-300.44 9(b) and 60-741.44 (b)
Recent assessment of physical and mental qualifications	Tag [Review of Physical and Mental Job Requirements Detail] provided in the IWD and Veterans Narratives to document information regarding date of last assessment, description of the review, changes or processes implemented, and/or date of next scheduled assessment. Customize Monitoring and Reporting Systems section, as needed. Customize Review of Personnel Processes sections in both Narratives, as needed. Customize Review of Physical and Mental Job Requirements sections in both Narratives, as needed.	Item 22	CFR 60-300.44 (c) and 60-741.44 (c)

^{*}The regulation requires you to evaluate the effectiveness of the outreach and recruitment efforts, annually. If you use REACH, this information can be automatically merged into the Narrative, using designated tags. Refer to page 51 of this guide for an example.

Exhibit B: Sample Audit Scheduling Letter Itemized List

(on the next page)

VIA CERTIFIED MAIL (NUMBER) RETURN RECEIPT REQUESTED

(Name of contractor official) (Title of contractor official) (Establishment Name) (Street Address) (City, State, Zip Code)

Dear (Name of contractor official):

The U.S. Department of Labor, Office of Federal Con	ntract Compliance Programs (OFCCP), selected your
[Insert: establishment, functi	onal unit, or corporate headquarters]	located at
	[Insert: compliance evaluation	
management compliance evaluation (CMCE)]. We a	re conducting this	[Insert:
compliance evaluation or CMCE] under the authority	of Executive Order 11246, Section 5	503 of the
Rehabilitation Act of 1973,1 the affirmative action pro-	ovisions of the Vietnam Era Veterans	'Readjustment
Assistance Act of 1974 ² and their implementing regul	lations in 41 CFR Chapter 60.3 In add	lition to
determining your compliance with these authorit	ies, we will also verify your complian	nce with the
regulations issued by the Veterans' Employment and	Training Service (VETS) requiring co	ontractors
covered under Section 4212 to file an annual report of	n their employment and hiring of pro-	tected
veterans. ⁴		

A compliance evaluation is initiated as a compliance review. The compliance review may progress in three phases: a desk audit, an on-site review, and an off-site analysis. OFCCP describes the phases of a compliance review in its regulations at 41 CFR Chapter 60.5 For the desk audit, please submit the following information:

- 1. a copy of your current Executive Order Affirmative Action Program (AAP) prepared in accordance with the requirements of 41 CFR § 60-1.40, and 41 CFR § 60-2.1 through § 60-2.17;
- 2. a copy of your current Section 503 and Section 4212 AAPs prepared in accordance with the requirements of 41 CFR § 60-741.40 through § 60-741.44 and 41 CFR § 60-300.40 through § 60-300.44, respectively; and
- 3. the support data specified in the enclosed Itemized Listing.

¹ 29 U.S.C. § 793 (2006).

² 38 U.S.C. § 4212 (2006).

³ E.O.11246, as amended, 3 CFR 339 12319 (1965); Section 503 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 793 (2006); Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212 (2006).

⁴ The VETS regulations require Federal contractors to submit either or both the VETS-100 and the VETS-100A Federal Contractor Report on Veterans' Employment. See 41 CFR 8.61-300.10

⁵41 CFR §§ 60-1.20(a), 60-300.60(a), and 60-741.60(a).

Please submit your AAPs and the support data specified in the enclosed Itemized Listing to the address listed on page one of this letter as soon as possible, but no later than 30 days from the date you receive this letter. Pursuant to 41 CFR § 60-1.12(e), failure to preserve complete and accurate records constitutes non-compliance with your obligations as a Federal contractor or subcontractor. Once the evaluation begins, you are required to maintain all personnel and employment records described in the regulations enforced by OFCCP until the final disposition of the evaluation.⁶

We encourage you to submit your information in an electronic format to reduce the amount of time it takes to complete our evaluation of your [Insert establishment, functional unit, or corporate headquarters]. Should you opt to email your submissions, use email address______.

You should be aware that OFCCP may initiate enforcement proceedings if you fail to submit AAPs and support data that represent a reasonable effort to meet the requirements of the regulations in 41 CFR Chapter 60.

Rest assured that OFCCP considers the information you provide in response to this Scheduling Letter as sensitive and confidential. Therefore, any disclosures we may make will be consistent with the provisions of the Freedom of Information Act.⁷

Please contactatevaluation.	if you have any questions concerning the compliance
Sincerely,	
(Name of District Director) District Director	

Enclosure (1)
Itemized Listing

⁶41 CFR §§ 60-1.12(a), 60-300.80(a), and 60-741.80(a).

⁷41 CFR § 60-1.20(g); Freedom of Information Act, as amended, 5 U.S.C. § 552 (2009).

ITEMIZED LISTING

Executive Order 11246

- 1. An organizational profile prepared according to 41 CFR § 60-2.11.
- 2. The formation of job groups (covering all jobs) consistent with criteria given in 41 CFR § 60-2.12.
- 3. For each job group, a statement of the percentage of minority and female incumbents as described in 41 CFR § 60-2.13.
- 4. For each job group, a determination of minority and female availability that considers the factors given in 41 CFR § 60-2.14(c)(1) and (c)(2).
- 5. For each job group, the comparison of incumbency to availability as explained in 41 CFR § 60-2.15.
- 6. 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 as described in 41 CFR § 60-2.16.

Section 503

- 7. Results of the evaluation of the effectiveness of outreach and recruitment efforts that were intended to identify and recruit qualified individuals with disabilities (IWDs) as described in 41 CFR § 60-741.44(f).
- 8. Documentation of all actions taken to comply with the audit and reporting system requirements described in 41 CFR § 60-741.44(h).
- 9. Documentation of the computations or comparisons described in 41 CFR § 60-741.44(k) for the immediately preceding AAP year and, if you are six months or more into your current AAP year when you receive this listing, provide the information for at least the first six months of the current AAP year.
- 10. The utilization analysis evaluating the representation of IWDs in each job group, or, if appropriate, evaluating the representation of IWDs in the workforce as a whole, as provided in 41 CFR § 60-741.45. If you are six months or more into your current AAP year on the date you receive this listing, please also submit information that reflects current year progress.

Section 4212 (VEVRAA)

- 11. Results of the evaluation of the effectiveness of outreach and recruitment efforts that were intended to identify and recruit qualified protected veterans as described in 41 CFR § 60-300.44(f).
- 12. Documentation of all actions taken to comply with the audit and reporting system requirements described in 41 CFR § 60-300.44(h).

- 13. Documentation of the computations or comparisons described in 41 CFR § 60-300.44(k) for the immediately preceding AAP year and, if you are six months or more into your current AAP year when you receive this listing, provide the information for at least the first six months of the current AAP year.
- 14. Documentation of the hiring benchmark adopted, the methodology used to establish it if using the five factors described in § 60-300.45(b)(2). If you are six months or more into your current AAP year on the date you receive this listing, please also submit information that reflects current year results.

Support Data

- 15. Copies of your Employer Information Report EEO-1 (Standard Form 100 Rev.) for the last three years. 1
- 16. A copy of your collective bargaining agreement(s), if applicable. Include any other documents you prepared, such as policy statements, employee notices or handbooks, etc. that implement, explain, or elaborate on the provisions of the collective bargaining agreement.
- 17. Information on your affirmative action goals for the immediately preceding AAP year and, where applicable (see below), progress on your goals for the current AAP year.²

For the immediately preceding AAP year, this report must include information that reflects:

- a. job group representation at the start of the AAP year, (i.e., total incumbents, total minority incumbents, and total female incumbents);
- b. the percentage placement rates (% goals) established for minorities and women at the start of the AAP year; and
- c. the actual number of placements (hires plus promotions) made during the AAP year into each job group with goals (i.e., total placements, total minority placements, and total female placements. For goals not attained, describe the specific good faith efforts made to achieve them.

If you are six months or more into your current AAP year on the date you receive this listing, please also submit information that reflects progress on goals established in your current AAP year, and describe your implementation of action-oriented programs designed to achieve these goals.³

¹ 41 CFR § 60-1.7.

² 41 CFR § 60-1.12(a), 41 CFR § 60-2.1(c) and 41 CFR § 60-2.16.

³ 41 CFR § 60-1.12 and 41 CFR § 60-2.17(c).

- 18. Data on your employment activity (applicants, hires, promotions, and terminations) for the immediately preceding AAP year and, if you are six months or more into your current AAP year when you receive this listing, provide the information in (a) through (c) below for at least the first six months of the current AAP year. You should present this data by job group (as defined in your AAP) or by job title.⁴
 - a. Applicants and Hires: For each job group or job title, this analysis must consist of the total number of applicants and the total number of hires, as well as the number of African- American/Black, Asian/Pacific Islander, Hispanic, American Indian/Alaskan Native, White, and the number of female and male applicants and hires. For each job group or job title applicants for whom race and/or sex is not known, should be included in the data submitted
 - However, if some of your job groups or job titles (most commonly, entry-level) are filled from the same applicant pool, you may consolidate your applicant data (but not hiring data) for those job groups or titles. For example, where applicants expressly apply for or would qualify for a broad spectrum of jobs (such as "Production," "Office," etc.) that includes several job groups, you may consolidate applicant data.
 - b. Promotions: For each job group or job title, provide the total number of promotions by gender and race/ethnicity. Also, include a definition of "promotion" as used by your company and the basis on which they were compiled (e.g. promotions to the job group, from and/or within the job group, etc.). If it varies for different segments of your workforce, please define the term as used for each segment. If you present promotions by job title, include the department and job group from which and to which the person(s) was promoted.
 - c. Terminations: For each job group or job title, provide the total number of employee terminations by gender and race/ethnicity. When presenting terminations by job title, include the department and job group from which the person(s) terminated.
- 19. Employee level compensation data for all employees (including but not limited to full-time, part-time, contract, per diem or day labor, temporary) as of the date of the workforce analysis in your AAP. Provide gender and race/ethnicity information and hire date for each employee as well as job title, EEO-1 Category and job group in a single file.⁶ Provide all requested data electronically, if maintained in an electronic format. See Note 1, below.

⁴ 41 CFR § 60-1.12, 41 CFR § 60-2.11-12, 41 CFR § 60-2.17(b)(2)and(d)(1), and 41 CFR § 60-3.4 and 3.15.

⁵ The term "race/ethnicity" as used throughout the Itemized Listing includes these racial and ethnic groups: African-American/Black, Asian/Pacific Islander, Hispanic, American Indian/Alaskan Native, and White.

 $^{^{6}}$ 41 CFR § 60-2.17(b)(3) and (d).

- a. For all employees, compensation includes base salary and or wage rate, and hours worked in a typical workweek. Other compensation or adjustments to salary such as bonuses, incentives, commissions, merit increases, locality pay or overtime should be identified separately for each employee.
- b. You may provide any additional data on factors used to determine employee compensation, such as education, past experience, duty location, performance ratings, department or function, and salary level/band/range/grade.
- c. Documentation and policies related to compensation practices of the contractor should also be included in the submission, particularly those that explain the factors and reasoning used to determine compensation.
- 20. Copies of reasonable accommodation policies, and documentation of any accommodation requests received and their resolution, if any.
- 21. Your most recent assessment of your personnel processes, as required by 41 CFR § 60-300.44(b) and § 60-741.44(b), including the date the assessment was performed, any actions taken or changes made as a result of the assessment, and the date of the next scheduled assessment.
- 22. Your most recent assessment of physical and mental qualifications, as required by 41 CFR § 60-300.44(c) and § 60-741.44(c), including the date the assessment was performed, any actions taken or changes made as a result of the assessment, and the date of the next scheduled assessment.

NOTES

NOTE 1: If any of the requested information is computerized, you must submit it in an electronic format that is complete, readable, and useable. Please use caution when submitting large electronic files. Check with the OFCCP Compliance Officer and your system administrator to ensure adherence to administrative and system guidelines.

Note 2: According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 1250-0003. We estimate that the average time required to complete this information collection is 27.9 hours per response, including the time for evaluating instructions, searching existing data sources, gathering and maintaining the data needed, and completing and evaluating the collection of information.

Send any comments concerning this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Federal Contract Compliance Programs, Room C-3325, 200 Constitution Avenue, N.W., Washington, D.C. 20210.