

EXECUTIVE ORDER 11246 SECTION 503 & VEVRAA AFFIRMATIVE ACTION PLAN

PREPARED FOR

CDS Family & Behavioral Health Services

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ORGANIZATIONAL PROFILE

CDS is a not-for-profit organization that has produced programs of quality, innovation and progressiveness since 1970. All services provided by CDS strive for family preservation. The corporation dedicates its efforts to providing excellence in youth and family services.

The mission for CDS is as follows: Strengthening Communities by Building Strong Families.

CDS is a multi-program agency administered through a central office. The programs and their funding sources are:

Interface/Family Action: Program for runaway, truant, throwaway/lockout and ungovernable youth and families in crisis (state, federal, local)

Independent Living: Life skills for foster care and other eligible youth (state, federal)

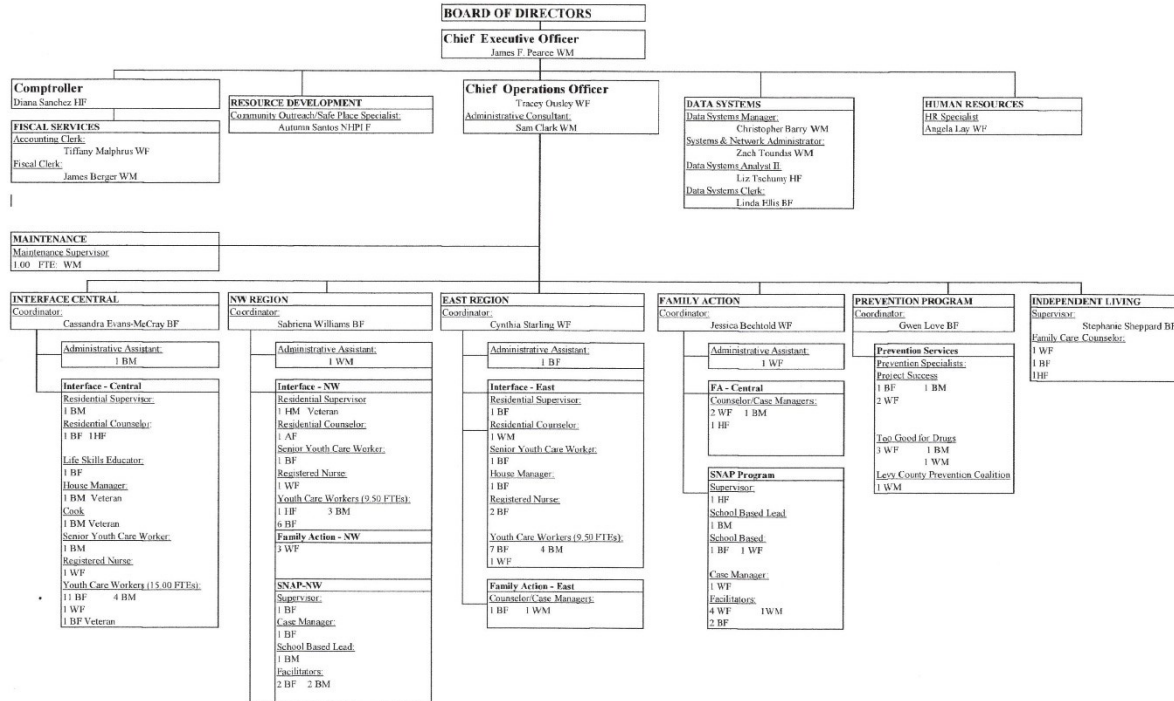
Prevention: Substance abuse prevention programs for youth, families and adults (state, federal, local)

SNAP®, which stands for STOP NOW AND PLAN, is an evidence-based, cognitive-behavioral model that helps troubled children and their parents learn how to effectively manage their emotions and 'keep problems small.

Administration: Centralized Fiscal, Personnel, and Program Management

Each of these programs has distinct goals and activities, which are consistent with the organization's mission.

ORGANIZATIONAL DISPLAY



10/14/2020

JOB CATEGORY ANALYSIS

LISTING OF JOB TITLES

CODE	JOB CATEGORY
1	EXECUTIVE/SENIOR LEVEL OFFICIALS Chief Executive Officer Chief Operations Officer Comptroller
1.1	FIRST/MID-LEVEL OFFICIALS Regional Coordinator Program Director Residential Supervisor SNAP Supervisor Independent Living Supervisor Prevention Coordinator
2	PROFESSIONALS Residential Counselor SNAP Case Manager Life Skills Educator Registered Nurse Community Outreach Specialist Human Resources Specialist Prevention Specialist Data Systems Analyst SNAP Facilitator
3	TECHNICIANS
4	SALES WORKERS
5	ADMINISTRATIVE SUPPORT WORKERS Administrative Assistant Data Entry Clerk Fiscal Clerk Accounting Clerk
6	CRAFT WORKERS Maintenance Supervisor
7	OPERATIVES
8	LABORERS AND HELPERS
9	SERVICE WORKERS Youth Care Workers Cook House Manager

UTILIZATION ANALYSIS

PLACEMENT OF INCUMBENTS IN JOB GROUPS

Job Category		Total Number of Incumbents	Number of Females	Female Incumbency Percentage	Number of Minorities	Minority Incumbency Percentage
1.1	Executive/Sr. Level Officials & Managers	3	3	100.0%	1	33.3%
1.2	First/Mid-Level Officials & Managers	12	8	66.7%	8	66.7%
2	Professionals	53	40	75.5%	26	49.1%
3	Technicians	N/A	N/A	N/A	N/A	N/A
4	Sales Workers	N/A	N/A	N/A	N/A	N/A
5	Administrative Support Workers	5	3	60.0%	2	40.0%
6	Craft Workers	1	0	0.0%	0	0.0%
7	Operatives	N/A	N/A	N/A	N/A	N/A
8	Laborers & Helpers	N/A	N/A	N/A	N/A	N/A
9	Service Workers	46	31	67.4%	44	95.7%
Total		120	85	70.8%	81	67.5%

DETERMINING AVAILABILITY

Job Category: (1.1) Executive/Sr. Level Officials & Managers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	23.6%	42.3%	20%	4.7%	8.5%	2010 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Alachua County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	80%	0.0%	0.0%	Organizational Data
Totals			100%	4.7%	8.5%	

Job Category: (1.2) First/Mid-Level Officials & Managers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	23.6%	42.3%	25%	5.9%	10.6%	2010 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Alachua County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	75%	0.0%	0.0%	Organizational Data
Totals			100%	5.9%	10.6%	

Job Category: (2.0) Professionals	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	24.6%	52.1%	30%	7.4%	15.6%	2010 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Alachua County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	70%	0.0%	0.0%	Organizational Data
Totals			100%	7.4%	15.6%	

Job Category: (5.0) Administrative Support Workers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	31.6%	72.7%	90%	28.4%	65.4%	2010 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Alachua County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	10%	0.0%	0.0%	Organizational Data
Totals			100%	28.4%	65.4%	

Job Category: (6.0) Craft Workers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	19.9%	4.3%	100%	19.9%	4.3%	2010 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Alachua County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	0%	0.0%	0.0%	Organizational Data
Totals			100%	19.9%	4.3%	

Job Category: (9.0) Service Workers	Raw Statistics		Value Weight	Weighted Statistics		Source of Statistics
	Minority	Female		Minority	Female	
1. Percentage of minorities or women with requisite skills in the recruiting area	38.7%	53.9%	100%	38.7%	53.9%	2010 U. S. Census Data; EEO-1 Job Categories by Sex, and Race/Ethnicity for Residence Geography, Alachua County
2. Percentage of minorities or women among those promotable, transferable, and trainable within the organization	0.0%	0.0%	0%	0.0%	0.0%	Organizational Data
Totals			100%	38.7%	53.9%	

COMPARING INCUMBENCY TO AVAILABILITY & ESTABLISHING PLACEMENT GOALS

	Job Category	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	Executive/Sr. Level Officials & Managers	100.0%	8.5%	No		33.3%	4.7%	No	
1.1	First/Mid-Level Officials & Managers	66.7%	10.6%	No		66.7%	5.9%	No	
2	Professionals	75.5%	15.6%	No		49.1%	7.4%	No	
3	Technicians	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
4	Sales Workers	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	Administrative Support Workers	60.0%	65.4%	No	See Note	40.0%	28.4%	No	
6	Craft Workers	0.0%	4.3%	No	See Note	0.0%	19.9%	No	See Note
7	Operatives	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
8	Laborers & Helpers	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
9	Service Workers	67.4%	53.9%	No		95.7%	38.7%	No	

Note: The 80% rule was followed in declaring underutilization and establishing goals when the actual employment of minorities or females is less than 80% of their availability.

EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT

This statement is to reaffirm the policy of CDS Family & Behavioral Health Services (CDS) on providing Equal Employment Opportunity to all employees and applicants for employment in accordance with all applicable Equal Employment Opportunity/Affirmative Action Laws, directives and regulations of Federal, State and Local governing bodies or agencies thereof.

We will not discriminate against any employee or applicant for employment because of race, color, national origin, sex, sexual orientation, gender identification, transgender, age, disability, military/veteran status, marital status, pregnancy, genetic information, religion or any other protected category.

We will take Affirmative Action to ensure that all employment practices are free of such discrimination. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selective layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship.


We prohibit harassment of any employee job applicant on the basis of their protected class status.

We will commit the necessary time and resources, both financial and human, to achieve the goals of Equal Employment Opportunity and Affirmative Action.

We will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these Affirmative Action objectives as well

as other established criteria. Any employee of this Organization or subcontractors to this Organization who do not comply with the Equal Employment Opportunity Policies and Procedures set forth in this Statement and plan will be subject to disciplinary action. Any subcontractor not complying with all applicable Equal Employment Opportunity/Affirmative Action laws, directives and regulations of the Federal, State and local-governing bodies or agencies thereof will be subject to appropriate legal sanctions.

We appointed the Chief Operations Officer as EEO Coordinator to manage our Equal Employment Opportunity Program. The responsibilities will include monitoring all Equal Employment Opportunity activities and reporting the effectiveness of this Affirmative Action Program, as required by Federal, State and Local agencies. If any employee or applicant for employment believes he/she has been discriminated against, please contact the EEO Coordinator.

Signature:  Date 1/4/2021
Chief Executive Officer

DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION

Responsibilities of the Equal Employment Opportunity Coordinator.

The Chief Operations Officer has been designated the Equal Employment Opportunity Coordinator and has the responsibility for designing and ensuring the effective implementation of our Affirmative Action Program (AAP). These responsibilities shall include, but are not limited to the following:

- Developing Equal Employment Opportunity (EEO) policy statements, affirmative action programs and internal and external communication procedures;
- Assisting in the identification of AAP/EEO program areas;
- Assisting management in arriving at effective solutions to AAP/EEO problems;
 - Measures the effectiveness of our program;
 - Determines the degree to which AAP goals and objectives are met; and
 - Identifies the need for remedial action;
- Keeping our Chief Executive Officer informed of equal opportunity progress and reporting potential problem areas within the organization through quarterly reports;
- Reviewing the organization'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;
- Auditing the contents of the company's bulletin board to ensure compliance information is posted and up-to-date; and
- Serving as liaison between our organization and enforcement agencies.

Responsibilities of Managers and Supervisors

It is the responsibility of all managerial and supervisory staff to implement our

AAP. These responsibilities include, but are not limited to:

- Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary;
- 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
- 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

We completed an analysis of our organization using the areas described below.

The results of the review; the corrective action taken, if necessary; and our goals are detailed for each area.

1. **Workforce Composition:** The utilization of minorities and females in the organization was reviewed. The results revealed that we have no underutilization of minorities or females in any job category.
2. **Recruitment:** We use a combination of factors to encourage employment applications from women and minorities. If we use outside recruiters or employment agencies, they are informed that we are a federal contractor and are subject to Executive Order 11246. We consistently include such language in all of our agreements with employment services providers and outside recruiters. When we use internal or commercial employment advertising venues, we include the “EOE/AA” designation on all print and electronic advertisements for employment. Samples of our advertisements are available for review. To encourage veteran applicants our positions are posted with Career Source North Central Florida.
3. **Applicant Flow Composition:** This is our initial Affirmative Action Plan. We are committed to collection of applicant demographic data to enable us to perform an analysis on a continuing basis.
4. **Total Selection Process:** The advertisements, application forms, interview procedures, job descriptions, and the qualifications necessary to perform each job was reviewed for deficiencies that would unnecessarily exclude minorities and females. None were found. There were 25 new hires during this reporting period. Of those 72.0% were females and 76.0% were minorities. This compares to a workforce that was 70.8% female and 67.5% minority at the end of the reporting period. There was no deficiency in the selection process. We will continue to monitor the selection rate for new hires.
5. **Transfer and Promotion Practices:** There were seven favorable transfers or promotions during this reporting period. Of those 85.7% were females and 85.7% were minorities. This compares to a workforce that is 70.8% female and 67.5% minorities. There was no deficiency in the number of minorities or females that were promoted during this reporting period. We will continue to monitor the transfer and promotion rate for incumbent employees.
6. **Terminations:** There were 26 total separations during this reporting period. Of those, 69.2% were female compared to a workforce of 70.8% females. The

termination percentage rate for females is lower than the total workforce percentage rate at the end of the reporting period. Of the total separations during this reporting period, 57.6% were minorities compared to a workforce of 67.5% minorities. The termination percentage rate for minorities is lower than the total workforce percentage rate at the end of the reporting period.

7. **Facilities and Company-sponsored Activities:** The participation of minorities and women in company-sponsored recreation activities, social events and use of facilities was reviewed. We are not aware of any conditions or practices that would tend to lead to exclusion or low participation of anyone in a protected class.
8. **Seniority Practices and Contract Provisions:** The seniority practices and contract provisions, if any, are reviewed for impacts on minorities and women. There were no such practices during this reporting period.
9. **Company Training Programs/Educational Assistance:** The company training programs will continue to be reviewed for under-representation or low participation by minorities and women.
10. **Regulatory Reporting:** The EEO-1 is being completed timely.
11. **Workforce Attitude:** The attitude of our workforce is monitored and reviewed for misunderstandings and/or lack of support for equal employment and affirmative action objectives and requirements. We will continue to monitor our workforce attitude and will take action, if needed, with positive training programs.
12. **Records, Posters and Subcontractor Notification:** Our Human Resources Department collects and maintains the records necessary to monitor and analyze the progress of our Affirmative Action Plan. Notices of our Equal Employment Opportunity and Affirmative Action Policies are prominently displayed on all of our employee bulletin boards. Subcontractors either have been or will be notified of our Equal Employment Opportunity and Affirmative Action Policies and are required to be in compliance with EEO/AA requirements.

ACTION-ORIENTED PROGRAMS

CDS has instituted action programs to eliminate identified problem areas and to help achieve specific affirmation action goals.

The areas that we will scrutinize for problems or deficiencies are:

- Underutilization of protected classes in specific job categories
- Movement of protected classes occurring at lesser rate
- Selection process eliminating protected classes at a higher rate
- Application forms not in compliance with the laws
- Inaccurate position descriptions or qualifications
- Invalid selection procedures
- Higher rejection rate of minority and female applicants.
- Exclusion of minorities and women from employer-sponsored programs/activities
- Segregation at facilities
- Seniority provisions contributing to discrimination
- Employees at all levels not supporting affirmative action policies
- Under-representation of minorities and females in training programs
- Lack of formal evaluation of the EEO/AA program's effectiveness
- EEO/AA clause not on purchase orders/contracts
- EEO/AA posters not displayed.

INTERNAL AUDIT AND REPORTING SYSTEM

Records

Records will be maintained by race and gender of all personnel actions, e.g., applicant flow, new hires, promotions, transfers, training, demotions, layoffs, recalls and terminations. These records will be kept separate from individual employee personnel files.

Progress Reports

A written report will be prepared and forwarded to the Chief Executive Officer quarterly. The report will include the following:

1. Statistical summary by race and sex of personnel actions indicated in the above "Records" section.
2. List of the goals established in the Affirmative Action Plan and a narrative explanation of the progress toward each goal including an explanation of the opportunities that have occurred, additional numerical goals that have been established as a result of the application of the Annual Hiring/Promotion Rate to employment opportunities, and the positive efforts made to attain each goal.
3. Explanations of Affirmative Action accomplishments where no goal was established.
4. Explanation of other Affirmative Action efforts, such as:
 - a. Minority and female referral sources contacted, persons contacted, dates of contact, and results.
 - b. Participation in EEO/AA related community activities.
 - c. Counseling of minorities and females.
 - d. Participation of minorities and females in training and tuition reimbursement.

Meetings

1. Program effectiveness and recommendations for improvement will be discussed at least quarterly during staff meetings with top management.
2. Meetings will also be held at least quarterly to inform all other levels of management as to the degrees of progress or deficiencies.

Year-end Report of Affirmative Action Program Results

When required, a written report will be prepared and forwarded to the appropriate Federal, State and local-governing bodies or agencies thereof within 30 days of completion of the first year certification and 30 days before expiration of the Certificate of Compliance, which summarizes all data previously prepared. This report includes at least the following:

1. Twelve-month statistical data by job category for personnel actions listed.
2. A narrative explanation of goal accomplishment for each goal established.
3. A detailed narrative explanation of good faith efforts for each goal not accomplished.

POLICY STATEMENT - EQUAL EMPLOYMENT OPPORTUNITY FOR INDIVIDUALS WITH DISABILITIES AND PROTECTED VETERANS

It is the policy of CDS not to discriminate against any employee or applicant for employment because he or she is an individual with a disability or a protected veteran, (i.e., disabled veteran, Armed Forces service medal veteran, recently separated veteran, or other veteran who served during a war, or in a campaign or expedition for which a campaign badge has been authorized). It is also the policy of our organization to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including, but not limited to recruitment, hiring, upgrading, promotion, demotion, transfer, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment.

Employees and applicants of CDS will not be subject to harassment on the basis of disability or status as a protected veteran. Additionally, retaliation, including intimidation, threats, or coercion, because an employee or applicant has objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State or local EEO law regarding individuals with disabilities or protected veterans is prohibited.

As Chief Executive Officer of CDS, I am committed to the principles of Affirmative Action and Equal Employment Opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all

levels of the company, I have selected the Chief Operations Officer as Equal Employment Opportunity Coordinator for CDS. One of the assigned duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of our programs.

In furtherance of our policy regarding Affirmative Action and Equal Employment Opportunity, we have developed a written Affirmative Action Program which sets forth the policies, practices and procedures that we are committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request, during normal business hours, in our Human Resources Department. Interested persons should contact the Chief Operations Officer for assistance.

Signature:  _____ Date 1/4/2021
Chief Executive Officer

REVIEW OF PERSONNEL PROCESSES

CDS annually reviews its personnel processes to determine whether its present procedures assure careful, thorough and systematic consideration of the qualifications of known individuals with disabilities and protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, we limit our consideration of a protected veteran's military record, including discharge papers, to only that portion of the record, which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon our review of our personnel processes, we will modify the personnel processes when necessary, and will include the development of new procedures in this Affirmative Action Program to ensure equal employment opportunity. To date, no modifications have been necessary.

REVIEW OF PHYSICAL AND MENTAL JOB QUALIFICATIONS

The physical and mental job qualifications of all jobs were reviewed during this reporting period to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified that are likely to have a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

CDS will continue to review physical and mental job qualification requirements whenever a job is vacated and the company intends to fill it through either hiring or promotion and will conduct a qualifications review whenever job duties change.

No pre-employment physical examinations or questionnaires are used in our hiring process.

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

REASONABLE ACCOMMODATION

CDS commits to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities and qualified disabled veterans, unless such accommodation would impose an undue hardship on the conduct of its business. We also commit to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation would cause significant difficulty or expense.

HARASSMENT PREVENTION & PROHIBITION AGAINST RETALIATION

Employees and applicants of CDS will not be subject to harassment because of disability or their status as a protected veteran. If an employee or applicant believes that he/she has been subjected to harassment because of their disability or status as a protected veteran should promptly contact their manager or the EEO Coordinator for assistance.

Retaliation, including intimidation, threat, or coercion, against an employee or applicant because they have objected to discrimination, engaged or may have engaged in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding individuals with disabilities or protected veterans is prohibited. Any employee or applicant who believes that they have been subject to retaliation because of their disability or status as a protected veteran should contact the EEO Coordinator for assistance.

This policy will be communicated to all employees and supervisors annually.

EXTERNAL DISSEMINATION OF POLICY, OUTREACH & POSITIVE RECRUITMENT

CDS has adopted OFCCP's 5.9% (based on Department of Labor's annual benchmark figure) hiring benchmark for protected veterans and 7.0% utilization goal for individuals with disabilities.

As of this plan year, our workforce was comprised of 3.3% veterans.

All subcontractors, vendors and suppliers are provided notification of CDS's Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities and qualified protected veterans. All recruiting sources, including State employment agencies, educational institutions and social service agencies are informed of the company's policy concerning the employment of qualified individuals with disabilities and qualified protected veterans and are advised to actively recruit and refer qualified persons for job opportunities.

We list all suitable employment openings with the appropriate employment service delivery system where the openings occur and maintains regular contact with the local veterans' employment representative. A copy of our Affirmative Action policy for individuals with disabilities and qualified protected veterans is provided to the State Employment Service, upon request.

Formal briefing sessions are held with representatives from recruitment sources and placement agencies, which include facility tours, discussion of current and prospective position openings, job descriptions and required qualifications and explanations of our selection procedures. Formal arrangements are made to ensure that

each recruitment source is provided with timely notice of job opportunities, to ensure that recruitment sources have an opportunity to refer qualified candidates.

When available, CDS participates in local job fairs sponsored by support groups for individuals with disabilities and veterans.

The equal employment opportunity clause concerning the employment of qualified individuals with disabilities and qualified protected veterans are included in all non-exempt subcontracts and purchase orders.

INTERNAL DISSEMINATION OF EEO POLICY

Copies of our affirmative action programs are made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support. Policies are restated to managers and supervisors annually.

Our Affirmative Action policy statement and the EEO poster are located on the employee bulletin board.

All applicants are invited to identify themselves as an individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as may be amended from time to time, and/or as a protected veteran under the equal employment opportunity provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, if they wish to benefit under this affirmative action program. Such invitation has been posted on bulletin boards throughout the facility and work areas. Employees may self-identify at any time.

All employees are advised annually of the company's policy and encouraged to aid in our affirmative action efforts to ensure a fair and effective program. The policy is redistributed to employees at this time.

Briefing sessions are conducted annually for managers and supervisors to review the applicable regulations and to discuss such affirmative action measures as training and reasonable accommodation.

When making internal Equal Opportunity audits, implementation of this affirmative action program will be reviewed.

Our EEO Coordinator attends workshops which stress the use of vocational rehabilitation agencies in hiring qualified individuals with disabilities and qualified disabled veterans and the provision of reasonable accommodation.

Articles and pictures regarding accomplishments of employees who are individuals with disabilities and protected veterans shall be included in company publications.

AUDIT AND REPORTING SYSTEM

The EEO Coordinator has the responsibility for developing and preparing the formal documents of the Affirmative Action Plan and the effective implementation of the plan. Responsibility is likewise vested with each departmental manager and supervisor.

Our 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 our AAP goals and objectives have been obtained.

The following activities are reviewed at least annually to ensure freedom from discrimination or stereotyping of individuals with disabilities and protected veterans in any manner, including that which may limit their access to any job for which they are qualified:

- 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 benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Sick leave, leaves of absence, or any other leave;
- Training, apprenticeships, attendance at professional meetings and conferences; and
- Any other term, condition, or privilege of employment.

Our audit system includes an annual report documenting the efforts to comply with 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 EEO Coordinator. During quarterly reporting, the following occurs:

- The EEO Coordinator will discuss any problems related to significant rejection ratios or EEO claims with the Chief Executive Officer; and
- The EEO Coordinator will report the status of our AAP goals and objectives to the Chief Executive Officer and will recommend remedial actions, if any, for the effective implementation of the AAP.

ESTABLISHMENT OF RESPONSIBILITY FOR AAP IMPLEMENTATION

EEO Coordinator's Responsibilities

In furtherance of our commitment to Affirmative Action and Equal Employment Opportunity for individuals with disabilities and protected veterans, the EEO Coordinator has the responsibility for designing and ensuring effective implementation of our AAP.

These responsibilities include, but are not limited to:

1. The development of the AAP for individuals with disabilities and protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with our affirmative action obligations;
3. 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;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
6. Keeping the executive officers of CDS informed of equal opportunity progress and problems within the company through quarterly reports;
7. Providing departmental managers with a copy of the Affirmative Action Program for Qualified Individuals with Disabilities and Qualified Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for individuals with disabilities and protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Auditing the contents of company bulletin boards annually to ensure that compliance information is posted and is up-to-date;
10. Serving as liaison between our organization and enforcement agencies; and
11. Serving as liaison between our organization and organizations for individuals with disabilities and protected veterans.

Manager and Supervisor Responsibilities

Managers and supervisors are advised annually of their responsibilities under the company's AAP for individuals with disabilities and protected veterans and of their obligations to:

1. Review the company's affirmative action policy for individuals with disabilities and protected veterans with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
3. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when personnel actions (hiring, promotion, transfers, terminations) occur; and
4. Review all employees' performance to ensure that nondiscrimination is adhered to in all personnel activities.

TRAINING TO ENSURE AAP IMPLEMENTATION

Training is provided to all personnel involved in the recruitment, screening, hiring, promotion, disciplinary and related employment processes to ensure that the commitments made in our Affirmative Action Plan are implemented.

INVITATION TO SELF-IDENTIFY FOR PROTECTED VETERANS

CDS is a government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, (VEVRAA) which requires government contractors to take affirmative action to employ and advance veterans in employment. VEVRAA prohibits discrimination and requires affirmative action in all personnel practices regarding protected veterans. The statute covers disabled veterans, Armed Forces service medal veterans, recently separated veterans, and other veterans who served during a war, or in a campaign or expedition for which a campaign badge has been authorized.

If you are a disabled veteran, recently separated veteran, other protected veteran or Armed Forces service medal veteran, we would like to include you under our affirmative action program. If you qualify as a disabled veteran, recently separated veteran, other protected veteran or Armed Forces service medal veteran and would like to be included under the affirmative action program, please let us know.

You may inform us of your desire to benefit under our affirmative action program at this time or at any time in the future.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the VEVRAA, as amended.

The information that you submit will be kept confidential, except that:

- Supervisors and managers may be informed regarding restrictions on the work or duties of disabled veterans, and regarding necessary accommodations;

- First aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and
- Government officials engaged in enforcing laws administered by OFCCP, or enforcing the Americans with Disabilities Act, as amended, may be informed.

CDS will take affirmative steps to employ qualified Vietnam era, special disabled, recently separated, and other protected veterans. We will take Affirmative Action to ensure that all employment practices are free of discrimination against certain veterans who served on active duty and special disabled veterans. Such employment practices include, but are not limited to, the following: hiring, upgrading, demotion, transfer, recruitment or recruitment advertising, selective layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. A complete written copy of our affirmative action plan is available for review by any employee or applicant for employment, during normal business hours in our Human Resources Department. Interested persons should contact the Chief Operations Officer for assistance.

If you are a disabled veteran it would assist us if you tell us about:

- Any special methods, skills, and procedures that qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and
- Any accommodations that we could make that would enable you to perform the job, including special equipment, changes in the physical layout of the job, elimination of certain duties relating to the job, provision of personal assistance services or other accommodations.

This information will assist us in placing you in an appropriate position and in making accommodations for your disability.

INVITATION TO SELF-IDENTIFY FOR INDIVIDUALS WITH DISABILITIES

CDS is a government contractor subject to Section 503 of the Rehabilitation Act of 1973, as amended, which requires government contractors to take affirmative action to employ and advance in employment qualified individuals with disabilities.

If you have a disability and would like to be considered under the affirmative action program, please tell us.

You may inform us of your desire to benefit under the program at this time and/or at any time in the future. This information will assist us in placing you in an appropriate position and in making any necessary accommodations for your disability.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with Section 503 of the Rehabilitation Act.

Information you submit about your disability will be kept confidential, except that:

- Supervisors and managers may be informed regarding restrictions on the work or duties of qualified individuals with disabilities, and regarding necessary accommodations;
- First aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment; and
- Government officials engaged in enforcing laws administered by OFCCP or the Americans with Disabilities Act, as amended, may be informed.

If you are a qualified individual with a disability, we would like to include you under our affirmative action program. It would assist us if you tell us about (i) any special methods, skills, and procedures that qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of

that kind, and (ii) any needed accommodations that would enable you to perform the essential functions of the job, including special equipment, changes in the physical layout of the job, elimination of marginal job duties relating to the job, provision of personal assistance services or other accommodations.

A written copy of our affirmative action plan is available for review by any employee or applicant for employment, during normal business hours in our Human Resources Department. Interested persons should contact the Chief Operations Officer for assistance.

TITLE	AA Plan
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