

COMMUNITIES Unlimited, Inc.

Affirmative Action Program For Protected Veterans

**August 1, 2021 through July 31, 2022
Plan Year**

CONFIDENTIAL, TRADE SECRET, AND PRIVATE MATERIAL

This Affirmative Action Plan contains confidential, trade secret, commercial, and private information of Communities Unlimited which is protected from disclosure by the Office of Federal Contract Compliance Programs pursuant to the Trade Secrets Act, 18 U.S.C. § 1905. The release of this information could cause substantial harm to Communities Unlimited or its employees within the meaning of the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 (b)(3), (4), (6) and (7) and the Trade Secrets Act. FOIA protects information in this document from mandatory disclosure to FOIA requestors. See, e.g., *Chrysler v. Brown*, 441 U.S. 281 (1979). Furthermore, release of any trade secret, confidential statistical or commercial information would be arbitrary and capricious in violation of the Administrative Procedure Act. See, e.g., *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1144 (D.C. Cir.), cert. denied, 485 U.S. 977 (1988).

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AFFIRMATIVE ACTION PROGRAM FOR PROTECTED VETERANS

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Introduction

COMMUNITIES Unlimited, Inc. (Communities Unlimited) sets forth this affirmative action program (“AAP”) for the year from August 1, 2021 through July 31, 2022, reaffirming its commitment to the spirit and letter of affirmative action law. Through the implementation of this plan Communities Unlimited continues its efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this AAP, Communities Unlimited recognizes its duty to ensure equal employment opportunity.

Definitions. For the purposes of this AAP, the term “Protected Veteran” shall be defined as follows, according to the VEVRAA regulations:

Active Duty Wartime or Campaign Badge Veteran means a veteran who served on active duty in the U.S. military, ground, naval, or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the U. S. Department of Defense.

Armed Forces Service Medal Veteran means any veteran who, while serving on active duty in the U.S. military, ground, naval, or air service, participated in a United States military operation to which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

Disabled Veteran means:

1. A veteran of the U. S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or
2. A person who was discharged or released from active duty because of a service-connected disability.

Protected Veteran means a veteran who is protected under the non-discrimination and affirmative action provisions of VEVRAA; specifically, a veteran who may be classified as a “disabled veteran,” “recently-separated veteran,” “active duty wartime or campaign badge veteran,” and/or an “Armed Forces Service Medal Veteran” as defined by this AAP and VEVRAA.

Recently-Separated Veteran means any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty in the U.S. military, ground, naval, or air service.

Pre-JVA veterans are those who would be protected by 41 C.F.R. Part 250 if it were not rescinded, but would not be protected under 41 C.F.R. Part 300, and if Communities Unlimited is found to still be signatory to any federal contracts signed on or before November 30, 2003 and which have not since been amended, modified and/or extended.

Equal Employment Opportunity Policy Statement

41 C.F.R. § 60-300.44(a)

In setting forth this plan Communities Unlimited reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment. Scott Wallace, as the EEO Administrator, oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. Communities Unlimited's top U.S. executive supports Communities Unlimited's AAP.

Communities Unlimited provides for an audit and reporting system regarding Communities Unlimited's affirmative action responsibilities under the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("VEVRAA") regulations, and assigns overall responsibility for the implementation of affirmative action responsibilities under these regulations.

Communities Unlimited recruits, hires, trains and promotes persons in all job titles, and ensures that all personnel actions are administered without regard to protected veteran status; and ensures that all employment actions are based only on valid job requirements. It is Communities Unlimited's policy not to discriminate because of a person's relationship or association with a protected veteran. This includes spouses and other family members. Communities Unlimited will safeguard the fair and equitable treatment of protected veteran spouses and family members with regard to all employment actions and prohibit harassment of applicants and employees because of their relationship or association with a protected veteran. Communities Unlimited's employees and applicants are not subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

1. filing a complaint with Communities Unlimited or with Federal, state, or local agencies regarding the status covered under this AAP;
2. assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any Federal, State, or local law requiring equal employment opportunity for protected veterans;
3. opposing any act or practice made unlawful by VEVRAA or its implementing regulations, or any other Federal, State or local law requiring equal opportunity for protected veterans; or
4. exercising any other right protected by VEVRAA or its implementing regulations.

Communities Unlimited's full AAP, absent the data metrics required by 41 CFR § 60-300.44(k), is available for inspection upon request. The method of obtaining a copy of the AAP is listed within the affirmative action policy statement physically posted at Communities Unlimited's establishment.

Review of Personnel Processes

41 C.F.R. § 300.44(b)

1. Communities Unlimited ensures its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees who are known protected veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.
2. Communities Unlimited also ensures that when a protected veteran is considered for employment opportunities, Communities Unlimited relies only on that portion of the individual's military record, including his or her discharge papers, relevant to the requirements of the opportunity in issue.
3. Communities Unlimited ensures that its personnel processes do not stereotype protected veterans in a manner which limits their access to all jobs for which they are qualified.
4. Communities Unlimited periodically reviews such processes and makes any necessary modifications to ensure that these obligations are carried out. A description of the review and any necessary modifications to personnel processes or development of new processes is included in this AAP.
5. Communities Unlimited designs procedures that facilitate a review of the implementation of this requirement by Communities Unlimited and the Government. The procedures Communities Unlimited uses are as follows:
 - a. The application or personnel form of each known applicant who is a protected veteran is annotated to identify each vacancy for which the applicant was considered, and the form will be quickly retrievable for review by the Department of Labor and Communities Unlimited's personnel officials for use in investigations and internal compliance activities.
 - b. Where applicants or employees are selected for hire, promotion, or training and Communities Unlimited undertakes any accommodation which makes it possible for it to place a disabled veteran on the job, Communities Unlimited makes a record containing a description of the accommodation. The record is treated as a confidential medical record in accordance with § 60-300.23(d).

Physical and Mental Job Qualifications

41 C.F.R. § 300.23 and 44(c)

1. Communities Unlimited adheres to a schedule for the periodic review of all physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified disabled veterans, they are job-related for the position and are consistent with job necessity.

2. Whenever Communities Unlimited applies physical or mental qualification standards in the selection of applicants or employees for employment or other change in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified disabled veterans, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity. Communities Unlimited reviews its job descriptions and qualifications to ensure they accurately reflect job duties and responsibilities. The schedule is as follows as job openings become available; as new job qualifications are established; and/or, when new equipment is installed.
3. No pre-employment physical examinations or questionnaires are used by Communities Unlimited prior to a job offer contingent on such examinations and other requirements.
4. Communities Unlimited may use as a defense to a violation of its obligations in Paragraph 2 above that an individual poses a direct threat to the health or safety of the individual or others in the workplace.
5. When Communities Unlimited conducts a medical examination or inquiry of a protected veteran it will do so according to the terms and conditions of the VEVRAA and Section 503 regulations, and the results of such an examination or inquiry are kept confidential according to federal regulations, which includes the following exceptions:
 - a. Supervisors and managers may be informed regarding restrictions on the work or duties of the applicant or employee and necessary accommodations;
 - b. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and,
 - c. Government officials engaged in enforcing the laws administered by the OFCCP regarding individuals with disabilities or protected veterans, or enforcing The Americans with Disabilities Act (“ADA”) and The Americans with Disabilities Act Amendment Act of 2008 (“ADAAA”), shall be provided relevant information on request.

Reasonable Accommodation

41 C.F.R. §60-300.44(d)

1. It is Communities Unlimited's policy as a matter of nondiscrimination to make reasonable accommodation to the known physical and mental limitations of all otherwise qualified disabled veterans unless it can demonstrate that the accommodation would impose an undue hardship on Communities Unlimited's business, in accordance with the terms and conditions of Section 503 regulations. Undue hardship will be determined by its definition under applicable regulations under Section 503 including, but not limited to the following: Undue hardship means, with respect to the provision of an accommodation, significant difficulty or expense incurred by the contractor, when considered in light of the factors set forth in 41 CFR § 60-300.2 (aa)(2), such as the overall financial resources of the facility and the impact of the accommodation upon the operation of the facility (this is not an all-inclusive list).
2. As a matter of affirmative action, if an employee who is known to be a disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, Communities Unlimited confidentially notifies the employee of the performance problem and inquires whether the problem is related to the employee's disability.
3. If the employee responds affirmatively, Communities Unlimited confidentially inquires whether the employee is in need of a reasonable accommodation.

Anti-Harassment Procedures

41 C.F.R. § 60-300.44(e)

Communities Unlimited has developed and implemented procedures to ensure its employees are not harassed because of their status as a protected veteran.

External Dissemination of Policy, Outreach, and Positive Recruitment

41 C.F.R. § 300.44(f)

1. Communities Unlimited sends written notification of its policy related to affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.
2. Communities Unlimited undertakes appropriate outreach and positive recruitment activities such as some of those listed below that are reasonably designed to effectively recruit protected veterans. It is not contemplated that Communities Unlimited will necessarily undertake all the activities listed below or that its activities will be limited to the items listed below. The scope of Communities Unlimited's efforts shall depend upon all circumstances, including Communities Unlimited's size and resources and the extent to which existing employment practices are adequate.
 - a. Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for veterans to fulfill its commitment to provide meaningful employment opportunities for such veterans:
 - i. The Local Veterans' Employment Representative in the local employment service office (i.e. the One-Stop) nearest Communities Unlimited's establishment;
 - ii. The Department of Veterans Affairs Regional Office nearest Communities Unlimited's establishment;
 - iii. The veterans' counselors and coordinators ("Vet-Reps") on college campuses;
 - iv. The service officers of the national veterans' groups active in the area of Communities Unlimited's establishment;
 - v. Local veterans' groups and veterans' service centers near Communities Unlimited's establishment;
 - vi. The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and
 - vii. Any organization listed in the Employer Resources section of the National Resource Directory (<http://www.nationalresourcedirectory.gov/>), or any future service that replaces or complements it.
 - b. Communities Unlimited also considers taking the actions listed below, as appropriate, to fulfill its commitment to provide meaningful employment opportunities to protected veterans:

- i. Formal briefing sessions should be held, preferably on Communities Unlimited's premises, with representatives from recruiting sources.
 - ii. Communities Unlimited's facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the company's selection process, and recruiting literature are an integral part of the briefing. At any such briefing sessions, the Communities Unlimited official in charge of its affirmative action program is in attendance when possible. Formal arrangements should be made for referral of applicants, follow up with sources, and feedback on disposition of applicants.
 - iii. Communities Unlimited's recruitment efforts at all educational institutions incorporate special efforts to reach students who are protected veterans.
 - iv. An effort is made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans.
 - v. Protected veterans are made available for participation in career days, youth motivation programs, and related activities in their communities.
 - vi. Communities Unlimited takes any other positive steps it deems necessary to attract qualified protected veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These persons may be located through the local chapters of organizations of and for any of the classifications of protected veterans.
 - vii. Communities Unlimited, in making hiring decisions, considers applicants who are known protected veterans for all available positions for which they may be qualified when the position(s) applied for is unavailable.
 - viii. Communities Unlimited considers listing its job openings with the National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it.
3. Communities Unlimited documents all activities it undertakes to comply with the obligations of this section, and retain these documents for a period of three (3) years.

Assessment of External Outreach and Recruitment Efforts

41 C.F.R. § 300.44(f)(3)

1. Communities Unlimited, on an annual basis, reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans. Communities Unlimited documents each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and Communities Unlimited's conclusion as to whether each effort was

effective. Among these criteria shall be the data collected pursuant to 41 C.F.R. § 60-300.44(k) for the current year and the two most recent previous years. If Communities Unlimited concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, it shall identify and implement alternative efforts listed in paragraphs (f)(1) or (f)(2) of this section to fulfill its obligations.

Internal Dissemination of Policy

41 C.F.R. § 60-300.44(g)

1. Communities Unlimited recognizes that a strong outreach program will be ineffective without adequate internal support from supervisory and management personnel and other employees.
2. Communities Unlimited implements and disseminates this policy internally as follows:
 - a. includes it in Communities Unlimited's policy manual or otherwise make the policy available to employees; and
 - b. if Communities Unlimited is party to a collective bargaining agreement, it notifies union officials and/or employee representatives to inform them of Communities Unlimited's policy, and request their cooperation.
3. Further, to assure greater employee cooperation and participation in Communities Unlimited's efforts, Communities Unlimited has developed the internal procedures listed in this section of the AAP for communication of its obligation to engage in affirmative action efforts to employ and advance in employment qualified protected veterans. It is not contemplated that Communities Unlimited's activities will be limited to those listed. These procedures shall be designed to foster understanding, acceptance and support among Communities Unlimited's executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to aid Communities Unlimited in meeting this obligation. Communities Unlimited additionally considers implementing and disseminating this policy internally as follows:
 - a. Informing all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for protected veterans;
 - b. Publicizing it in Communities Unlimited's newspaper, magazine, annual report and other media;
 - c. Conducting special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the chief executive officer's support for the affirmative action policy;
 - d. Discussing the policy thoroughly in both employee orientation and management training programs; and

- e. When employees are featured in employee handbooks or similar publications for employees, including disabled veterans.

Audit and Reporting System

C.F.R. § 60-300.44(h)

1. Communities Unlimited has designed and implemented an audit and reporting system that:
 - a. Measures the effectiveness of Communities Unlimited's AAP;
 - b. Indicates any need for remedial action;
 - c. Determines the degree to which Communities Unlimited's objectives have been attained;
 - d. Determines whether known protected veterans have had the opportunity to participate in all of Communities Unlimited's sponsored educational, training, recreational and social activities;
 - e. Measures Communities Unlimited's compliance with the AAP's specific obligations; and
 - f. Documents the actions taken to comply with the obligations of paragraphs (i) through (v) above, and retain these documents as employment records for three years subject to the recordkeeping requirements of § 60-300.80.
2. Where the affirmative action program is found to be deficient, Communities Unlimited undertakes necessary action to bring the program into compliance.

Responsibility for Implementation of the Plan

1. Identification and Responsibilities of EEO/AA Administrator **41 C.F.R. § 60-300.44(i)**

In furtherance of Communities Unlimited's commitment to Affirmative Action and Equal Employment Opportunity, overall responsibility for implementing Communities Unlimited's AAP rests with its EEO/AA Administrator, whose identity should appear on all internal and external communications regarding Communities Unlimited's AAP. The EEO/AA Administrator shall be given top management support and staff to manage the implementation of this program as it pertains to all applicable laws, orders and regulations, including VEVRAA. Specifically, Scott Wallace or the designated representative's duties include:

- a. Ensures that Communities Unlimited lists its job openings in accordance with the requirements of 41 C.F.R. § 300.5.
- b. Ensuring Communities Unlimited posts in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the OFCCP

- Director provided by or through the contracting officer. Such notices shall state the rights of applicants and employees as well as Communities Unlimited's obligation under the law to take affirmative action to employ and advance in employment qualified employees and applicants who are protected veterans.
- c. Ensuring Communities Unlimited's applicants or employees who are disabled veterans are provided the notice in a form that is accessible and understandable to the individual applicant or employee (e.g., providing Braille or large print versions of the notice, or posting a copy of the notice at a lower height for easy viewing by a person using a wheelchair) when an applicant or employee requests the poster in an alternative format, or when Communities Unlimited knows that an applicant or employee is unable to read the poster because of a disability. Communities Unlimited may also provide the poster to an applicant or employee who is a disabled veteran in other alternate means, such as on disc or in audio recording, as long as the format provided enables the individual who is a disabled veteran to access the contents of a poster.
 - d. Ensuring that, with respect to employees, if any, who do not work at a physical location of Communities Unlimited, Communities Unlimited satisfies its posting obligations by posting such notices in an electronic format, provided that Communities Unlimited provides computers, or access to computers, that can access the electronic posting to such employees, or Communities Unlimited has actual knowledge that such employees otherwise are able to access the electronically posted notices.
 - e. Ensuring electronic notices for employees are posted in a conspicuous location and format on Communities Unlimited's intranet or sent by electronic mail to employees. An electronic posting is used by Communities Unlimited to notify job applicants of their rights if Communities Unlimited utilizes an electronic application process. Such electronic applicant notice are conspicuously stored with, or as part of, the electronic application.
 - f. Ensuring that to the extent this requirement is applicable to Communities Unlimited, Communities Unlimited notifies labor organizations of its EEO policy as required by 41 C.F.R. § 60-300.44(g).
 - g. Ensuring Communities Unlimited includes the provisions of this clause in every subcontract or purchase order in excess of \$150,000, unless exempted by the rules, regulations, or orders of the Secretary of Labor pursuant to VEVRAA, so that such provisions will be binding upon each subcontractor or vendor, under the terms and conditions of 41 CFR § 60-300.5(a), per Federal Acquisition Regulation-Inflation Adjustment of Acquisition-Related Thresholds, 80 FR 38293 (2015).
 - h. Ensuring that all solicitations or advertisements for employees placed by or on behalf of Communities Unlimited, state that all qualified applicants will receive consideration for employment without regard to their protected veteran status.
 - i. Developing, maintaining and, where appropriate, modifying Communities Unlimited's AAP for protected veterans, policy statements, personnel policies, internal and external communication techniques including discussions with managers, supervisors and

employees to ensure Communities Unlimited's policies are followed, and monitoring the effectiveness of these actions.

- j. Advising supervisors that they are responsible to prevent harassment of employees due to their status as a protected veteran.
- k. Identifying problem areas with line management in the implementation of the program, and helping management develop solutions to any identifiable problem area.
- l. Designing, implementing and overseeing an audit and reporting system to monitor the progress of the Company and the AAP's effectiveness, including auditing the contents of Communities Unlimited's electronic and hard copy bulletin boards on a regular basis to ensure that compliance information that is posted is up to date.
- m. Serving as liaison between Communities Unlimited and governmental enforcement agencies, community groups, vocational rehabilitation organizations, and organizations for protected veterans.
- n. Evaluating the effectiveness of Communities Unlimited's plan on a regular basis, and reporting to management.
- o. Monitoring policies and procedures including the selection, evaluation, promotion and training process with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
- p. Assisting in ensuring that Communities Unlimited has processes and procedures: a) to ensure career counseling for employees who are protected veterans, when requested and appropriate; and, b) to review personnel actions, policies, procedures, and employee and applicants' qualifications to ensure protected veterans are treated in accordance with anti-discrimination laws when hiring, promotion, transfer, and termination actions occur.
- q. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
- r. Assisting in the investigation, handling and disposition of employee discrimination and harassment complaints.
- s. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, and opportunity for participation in Company-sponsored recreational, educational and social activities.
- t. Overseeing and ensuring that the below self-identification procedures are conducted as set forth in the VEVRAA regulations, using the language and manner prescribed by the OFCCP Director and published on the OFCCP Web site, as follows:
 - i. Pre-offer self-identification invitation procedures for Communities Unlimited's job applicants as set forth in 41 C.F.R. § 60-300.42 (a); and
 - ii. Post-offer identification procedures for Communities Unlimited's job applicants as set forth in 41 C.F.R. § 60-300.42 (a).

Further, Communities Unlimited does not compel or coerce an individual to self-identify as a protected veteran. Communities Unlimited keeps all information on self-identification confidential, and maintains it in a data analysis file (rather than in the medical or personnel files of individual employees) as set forth in 41 C.F.R. § 60-300.23(d). Communities Unlimited only uses the self-identification information in accordance with the VEVRAA regulations.

- u. Ensuring that Communities Unlimited complies with its obligations under 41 C.F.R. § 60-300.45, which requires that Communities Unlimited establish benchmarks for hiring, the purpose of which is to create a quantifiable method by which Communities Unlimited can measure its progress toward achieving equal employment opportunity for protected veterans. The benchmarks will be set on an annual basis and will be documented also as set forth in this AAP.
- v. If an applicant identifies himself or herself as a disabled veteran in the post-offer self-identification detailed above, Communities Unlimited inquires of the applicant whether an accommodation is necessary, and, if so, engages with the applicant regarding reasonable accommodation. Communities Unlimited may make such inquiries to the extent they are consistent with the Americans with Disabilities Act. Communities Unlimited maintains a separate file in accordance with Section 60-300.23(d) on persons who have self-identified as disabled veterans.

2. Management Responsibilities

41 C.F.R. § 60-300.44(i)

Line and upper management are advised of their responsibilities for Communities Unlimited's AAP regarding protected veterans within his or her area of responsibility, including but not limited to their obligations to:

- a. Review Communities Unlimited's AAP for protected veterans with subordinate managers and supervisors to ensure they are aware of the policy, understand their obligation to comply with it in all personnel actions and understand the need for support at all levels.
- b. Assist in the auditing of plan progress, identification of problem areas, formulation of solutions, establishment of departmental goals and objectives, and development of training programs, when appropriate.
- c. Review the qualifications of applicants and employees in their area of responsibility to ensure protected veterans are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur.
- d. Review employees' performance to ensure that illegal discrimination regarding protected veterans does not occur.
- e. Make available career counseling to employees who are protected veterans, when so requested, and as appropriate.

- f. Review position descriptions to see that they adequately reflect the job to be performed.
- g. Audit training programs, hiring, and promotion patterns.
- h. Assist subordinates and upper management in the prevention of harassment.
- i. Show support for this AAP.

Affirmative Action Training
41 C.F.R. § 60-300.44(j)

Communities Unlimited provides training to all personnel involved in the recruitment, screening, selection, promotion, disciplinary and other related processes to ensure its AAP commitments are implemented.

COMMUNITIES Unlimited, Inc.

Affirmative Action Program for Individuals with Disabilities

**August 1, 2021 through July 31, 2022
Plan Year**

CONFIDENTIAL, TRADE SECRET, AND PRIVATE MATERIAL

This Affirmative Action Plan contains confidential, trade secret, commercial, and private information of Communities Unlimited, which is protected from disclosure by the Office of Federal Contract Compliance Programs pursuant to the Trade Secrets Act, 18 U.S.C. § 1905. The release of this information could cause substantial harm to Communities Unlimited or its employees within the meaning of the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 (b)(3), (4), (6) and (7) and the Trade Secrets Act. FOIA protects information in this document from mandatory disclosure to FOIA requestors. See, e.g., *Chrysler v. Brown*, 441 U.S. 281 (1979). Furthermore, release of any trade secret, confidential statistical or commercial information would be arbitrary and capricious in violation of the Administrative Procedure Act. See, e.g., *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1144 (D.C. Cir.), cert. denied, 485 U.S. 977 (1988).

COMMUNITIES Unlimited, Inc.

AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES

**August 1, 2021 through July 31, 2022
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Introduction

COMMUNITIES Unlimited, Inc. (Communities Unlimited) sets forth this Affirmative Action Program (“AAP”) for the year from August 1, 2021 through July 31, 2022, reaffirming its commitment to the spirit and letter of affirmative action law. Through the implementation of this plan Communities Unlimited continues its efforts to comply with Section 503 of the Rehabilitation Act of 1973 (“Section 503”) and its implementing regulations, as amended, and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this plan, Communities Unlimited recognizes its duty to ensure equal employment opportunity for, and to prevent discrimination against, individuals with disabilities. The following statement of policy reinforces that belief.

Equal Employment Opportunity Policy Statement

41 C.F.R. § 60-741.44(a)

In setting forth this plan Communities Unlimited reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment. Scott Wallace, as the EEO Administrator, oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. Communities Unlimited’s top U.S. executive supports Communities Unlimited’s AAP.

Communities Unlimited provides for an audit and reporting system regarding Communities Unlimited’s affirmative action responsibilities under Section 503 regulations, and assigns overall responsibility for the implementation of affirmative action responsibilities under these regulations.

Communities Unlimited recruits, hires, trains and promotes persons in all job titles, and ensures that all personnel actions are administered without regard to disability; and ensures that all employment actions are based only on valid job requirements. Communities Unlimited’s employees and applicants are not subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

1. filing a complaint with Communities Unlimited or with Federal, state, or local agencies regarding the status covered under this AAP;
2. assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any Federal, State, or local law requiring equal employment opportunity for individuals with disabilities;
3. opposing any act or practice made unlawful by Section 503 or its implementing regulations, or any other Federal, State or local law requiring equal opportunity for individuals with disabilities; or
4. exercising any other right protected by Section 503 or its implementing regulations in this part.

Communities Unlimited's full AAP, absent the data metrics required by 41 CFR § 60-741.44(k), is available for inspection upon request. The method of obtaining a copy of the AAP is listed within the affirmative action policy statement physically posted at Communities Unlimited's establishment.

Review of Personnel Processes

41 C.F.R. § 741.44(b)

1. Communities Unlimited ensures its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.
2. Communities Unlimited also ensures its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to jobs for which they are qualified.
3. Communities Unlimited also ensures its applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communications technologies.
4. Communities Unlimited provides necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. Communities Unlimited periodically reviews such processes and makes any necessary modifications to ensure that these obligations are carried out. Communities Unlimited designs procedures that facilitate a review of the implementation of this requirement by Communities Unlimited and the Government. A description of the review and any necessary modifications to personnel processes or development of new processes are included in this AAP, and are as follows:
 - a. The application or personnel form of each known applicant who is an individual with a disability is annotated to identify each vacancy for which the applicant was considered, and the form is quickly retrievable for review by the Department of Labor and Communities Unlimited's personnel officials for use in investigations and internal compliance activities.
 - b. Where applicants or employees are selected for hire, promotion, or training and Communities Unlimited undertakes any accommodation which makes it possible for him or her to place an individual with a disability on the job, Communities Unlimited makes a record containing a description of the accommodation. The record is treated as a confidential medical record in accordance with § 60-741.23(d).

Review of Physical and Mental Job Qualifications

41 C.F.R. § 60-741.44(c)

1. Communities Unlimited has the following schedule for its review of physical and mental job qualification standards to ensure that, to the extent qualification

standards tend to screen out qualified people with disabilities, such qualifications are job-related for the position in question and consistent with business necessity, and adheres to this schedule. The schedule is as follows as job openings become available; as new job qualifications are established; and/or, when new equipment is installed.

2. Whenever Communities Unlimited applies physical or mental qualification standards in the selection of applicants or employees for employment or other changes in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified individuals on the basis of disability, the standards are related to the specific job or jobs for which the individual is being considered and consistent with business necessity.
3. Communities Unlimited may use as a defense to a violation of its obligations in Paragraph 2 above that an individual poses a direct threat to the health or safety of the individual or others in the workplace.
4. No pre-employment physical examinations or questionnaires are used by Communities Unlimited prior to a job offer contingent on such examinations and other requirements.
5. When Communities Unlimited conducts a medical examination or inquiry of a person with a disability, it will do so according to the terms and conditions of the Federal Regulations implementing Section 503, and the results of such an examination or inquiry are kept confidential according to Federal regulations, which includes the following exceptions:
 - a. Supervisors and managers may be informed regarding restrictions on the work or duties of the applicant or employee and necessary accommodations;
 - b. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and,
 - c. Government officials engaged in enforcing the laws administered by the OFCCP regarding individuals with disabilities, or enforcing The Americans with Disabilities Act (“the ADA”) and The Americans with Disabilities Act Amendment Act of 2008 (“the ADAAA”), shall be provided relevant information on request.

Reasonable Accommodation to Physical and Mental Limitations

41 C.F.R. § 60-741.44(d)

1. It is Communities Unlimited's policy, as a matter of nondiscrimination, to make reasonable accommodation to the known physical and mental limitations of all otherwise qualified individuals with a disability, unless Communities Unlimited can demonstrate that the accommodation would impose an undue hardship on Communities Unlimited's business. Undue hardship will be determined by its definition under applicable regulations under Section 503 including, but not limited to the following: Undue hardship means, with respect to the provision of an accommodation, significant difficulty or expense incurred by the contractor, when considered in light of the factors set forth in 41 CFR § 741.2 (aa)(2), such as the overall financial resources of the facility and the impact of the accommodation upon the operation of the facility (this is not an all-inclusive list).
2. As a matter of affirmative action, if an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, Communities Unlimited shall confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, Communities Unlimited shall confidentially inquire whether the employee is in need of a reasonable accommodation.

Anti-Harassment Procedures

41 C.F.R. § 60-741.44(e)

Communities Unlimited has developed and implemented procedures to ensure that its employees are not harassed on the basis of disability.

External Dissemination of Policy, Outreach, and Positive Recruitment

41 C.F.R. § 60-741.44(f)

1. Communities Unlimited undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities. It is not contemplated that Communities Unlimited will necessarily undertake all the activities listed in Paragraph (f)(2) of this section or that its activities will be limited to those listed. The scope of Communities Unlimited's efforts shall depend upon all the circumstances, including the contractor's size and resources and the extent to which existing employment practices are adequate.
2. Examples of outreach and recruitment activities. Below are examples of outreach and positive recruitment activities Communities Unlimited may undertake in accordance with Paragraph 1 of this section.
 - a. Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training

opportunities for individuals with disabilities, to fulfill its commitment to provide equal employment opportunity for such individuals:

- i. the State Vocational Rehabilitation Service Agency (“SVRA”), State mental health agency, or State developmental disability agency in the area of the contractor's establishment;
 - ii. the Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor's establishment;
 - iii. the Department of Veterans Affairs Regional Office nearest Communities Unlimited’s establishment (www.va.gov);
 - iv. entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) (www.earnworks.com);
 - v. local Employment Network (“EN”) organizations (other than Communities Unlimited, if Communities Unlimited is an EN) listed in the Social Security Administration's Ticket to Work Employment Network Directory (www.yourtickettowork.com/endir);
 - vi. local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;
 - vii. placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
 - viii. private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.
- b. In addition, Communities Unlimited has considered taking the actions listed below to fulfill its commitment to provide equal employment opportunities to individuals with disabilities. It is not contemplated that Communities Unlimited will necessarily undertake all of the activities listed below.
- i. Formal briefing sessions held, preferably on Communities Unlimited’s premises, with representatives from recruiting sources. Communities Unlimited’s facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of Communities Unlimited’s selection process, and recruiting literature are an integral part of any such briefing. At any such

briefing sessions, Communities Unlimited's official in charge of Communities Unlimited's AAP should be in attendance when possible. Formal arrangements are made for referral of applicants, follow up with sources, and feedback on disposition of applicants, from any such briefings.

- ii. Communities Unlimited's recruitment efforts at all educational institutions incorporate special efforts to reach students who are individuals with disabilities.
 - iii. Communities Unlimited makes an effort to participate in work-study programs for students, trainees, or interns with disabilities in programs found through outreach, such as to State and local schools and universities, and through EARN.
 - iv. Individuals with disabilities may be made available for participation in Communities Unlimited's career days, youth motivation programs, and related activities in Communities Unlimited's communities.
 - v. Communities Unlimited takes any other positive steps it deems necessary to attract individuals with disabilities not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These individuals may be located through State and local agencies supported by the U.S. Department of Education's Rehabilitation Services Administration (RSA) (<http://rsa.ed.gov/>), local Ticket-to-Work Employment Networks, or local chapters of groups or organizations that provide services for individuals with disabilities.
 - vi. Communities Unlimited, in making hiring decisions, considers applicants who are known to have disabilities for all available positions for which they may be qualified when the position(s) applied for is unavailable.
3. Communities Unlimited sends written notification of its policy relating to its affirmative action efforts to all its covered federal subcontractors, including covered subcontracting vendors and suppliers, requesting appropriate action on their part.
 4. Communities Unlimited documents all activities it undertakes to comply with the obligations of this section, and retains these documents for a period of three (3) years.

Assessment of External Outreach and Recruitment Efforts

41 C.F.R. § 60-741.44(f)(3)

1. Communities Unlimited on an annual basis, reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate its effectiveness in identifying and recruiting qualified individuals with disabilities. Communities Unlimited documents each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and Communities Unlimited's conclusion as to whether each effort was effective. Among these criteria shall be the data Communities Unlimited collected pursuant to 41 C.F.R. § 741.44(k) for the current year and the two most recent previous years. If Communities Unlimited concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, it identifies and implements alternative efforts listed in Paragraph 2 above to fulfill its obligations.

Internal Dissemination of Policy

41 C.F.R. § 60-741.44(g)

1. Communities Unlimited recognizes that even a strong outreach program for individuals with disabilities may be ineffective without adequate internal support from its supervisors and employees. Therefore, to ensure greater employee cooperation and participation in Communities Unlimited's efforts regarding its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities, Communities Unlimited has developed the following internal procedures. These procedures have been designed to foster understanding, acceptance and support among Communities Unlimited's executive, management, supervisory, and other employees to encourage such persons to take the necessary actions to aid the contractor in meeting this obligation.
2. Communities Unlimited implements and disseminates this policy internally as follows:
 - a. includes the policy in Communities Unlimited's policy manual or otherwise makes the policy available to employees; and
 - b. where Communities Unlimited is a party to a collective bargaining agreement, it notifies union officials and/or employee representatives of the contractor's policy and request their cooperation;
3. Below are some of the other methods Communities Unlimited may additionally use to implement and disseminate this policy internally:
 - a. informs all employees and prospective employees of Communities Unlimited's commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities;
 - b. periodically schedules special meetings with all employees to discuss the policy and explain individual employee responsibilities;
 - c. publicizes the policy in Communities Unlimited's newspaper, magazine, annual report and other media;

- d. conducts special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation making clear Communities Unlimited's chief executive officer's support for the affirmative action policy;
- e. discusses the policy thoroughly in both employee orientation and management training meetings;
- f. includes articles on accomplishments of individuals with disabilities in Communities Unlimited's publications; and
- g. when employees are featured in employee handbooks and similar publications, includes individuals with disabilities.

Audit and Reporting System

41 C.F.R. § 60-741.44(h)

Communities Unlimited has designed and has implemented an audit and reporting system that:

1. Measures the effectiveness of Communities Unlimited's affirmative action program.
2. Indicates any need for remedial action.
3. Determines the degree to which Communities Unlimited's affirmative action objectives have been attained.
4. Determines whether known individuals with disabilities have had the opportunity to participate in all company sponsored-educational, training, recreational and social activities.
5. Measures Communities Unlimited's compliance with the AAP's specific obligations.
6. Documents the actions taken to comply with the obligations of Paragraphs (1) through (5) of this section, and retain these documents as employment records for a period of three years from the date of making of the record.
7. Where Communities Unlimited, upon its review, finds its AAP to be deficient and need further progress, Communities Unlimited undertakes necessary action to bring the program into compliance.

Responsibility for Implementation of the Plan

41 C.F.R. § 60-741.44(i)

1. Identification and Responsibilities of the EEO/AA Administrator. 41 C.F.R. § 60-741.44(i)

In furtherance of Communities Unlimited's commitment to Affirmative Action and Equal Employment Opportunity, overall responsibility for implementing Communities Unlimited's

AAP rests with its EEO/AA Administrator, whose identity appears on all internal and external communications regarding Communities Unlimited's AAP. The EEO/AA Administrator has been given the necessary senior management support and staff to manage the implementation of this AAP. Specifically, Scott Wallace or the designated representative's duties include the following, all of which are administered in accordance with the Section 503 regulations:

- a. Ensuring Communities Unlimited posts in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the OFCCP Director provided by or through the contracting officer. Such notices shall state the rights of applicants and employees as well as Communities Unlimited's obligation under the law to take affirmative action to employ and advance in employment qualified employees and applicants with disabilities.
- b. Ensuring Communities Unlimited's applicants or employees with disabilities are provided the notice in a form that is accessible and understandable to the individual applicant or employee (e.g., providing Braille or large print versions of the notice, or posting a copy of the notice at a lower height for easy viewing by a person using a wheelchair) when an applicant or employee requests the poster in an alternative format, or when Communities Unlimited knows that an applicant or employee is unable to read the poster because of a disability. Communities Unlimited may also provide the poster to an applicant or employee with a disability in other alternate means, such as on disc or in audio recording, as long as the format provided enables the individual with a disability to access the contents of a poster.
- c. Ensuring that, with respect to employees, if any, who do not work at a physical location of Communities Unlimited, Communities Unlimited satisfies its posting obligations by posting such notices in an electronic format, provided that Communities Unlimited provides computers, or access to computers, that can access the electronic posting to such employees, or Communities Unlimited has actual knowledge that such employees otherwise are able to access the electronically posted notices.
- d. Ensuring electronic notices for employees are posted in a conspicuous location and format on Communities Unlimited's intranet or sent by electronic mail to employees. An electronic posting is used by Communities Unlimited to notify job applicants of their rights if Communities Unlimited utilizes an electronic application process. Such electronic applicant notice are conspicuously stored with, or as part of, the electronic application.
- e. Ensuring that to the extent this requirement is applicable to Communities Unlimited, Communities Unlimited notifies labor organizations of its EEO policy as required by 41 C.F.R. § 60-741.44(g).
- f. Ensuring Communities Unlimited includes the provisions of this clause in every subcontract or purchase order in excess of \$15,000 under the terms and conditions of 41 CFR 60-741.5(a), per Federal Acquisition Regulation-Inflation Adjustment of Acquisition-Related Thresholds, 75 FR 53129 (2010).
- g. Ensuring that all solicitations or advertisements for employees placed by or on behalf of Communities Unlimited, state that all qualified applicants will receive consideration for employment and will not be discriminated against on the basis of disability.

- h. Developing, maintaining and, where appropriate, modifying Communities Unlimited's AAP for individuals with disabilities, policy statements, personnel policies, internal and external communication techniques including discussions with managers, supervisors and employees to ensure Communities Unlimited's policies are followed, and monitoring the effectiveness of these actions.
- i. Advising supervisors that they are responsible for preventing harassment of employees due to their status as individuals with disabilities.
- j. Ensuring affirmative action training is conducted in accordance with 41 C.F.R. § 60-741.44(j).
- k. Identifying problem areas with line management in the implementation of the program, and helping management develop solutions to any identifiable problem area.
- l. Designing, implementing and overseeing an audit and reporting system to monitor the progress of Communities Unlimited and the AAP's effectiveness, including auditing the contents of Communities Unlimited's electronic and hard copy bulletin boards on a regular basis to ensure that compliance information that is posted is up to date and accessible to applicants and employees with disabilities.
- m. Serving as liaison between Communities Unlimited and governmental enforcement agencies, community groups, vocational rehabilitation organizations, and organizations for individuals with disabilities.
- n. Evaluating the effectiveness of Communities Unlimited's plan on a regular basis, as described in this AAP, and reporting to management.
- o. Monitoring policies and procedures including the selection, evaluation, promotion and training process with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
- p. Overseeing Communities Unlimited's processes and procedures: a) to ensure that career counseling for employees with known disabilities, when requested and appropriate; and, b) to review personnel actions, policies, procedures, and employee and applicants' qualifications to ensure individuals with disabilities are treated in accordance with anti-discrimination laws when hiring, promotion, transfer, and termination actions occur.
- q. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
- r. Assisting in the investigation, handling and disposition of employee discrimination and harassment complaints.
- s. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, and opportunity for participation in Company-sponsored recreational, educational and social activities.
- t. Overseeing and ensuring that the below self-identification procedures are conducted as set forth in the Section 503 regulations, using the language and manner prescribed by the OFCCP Director and published on the OFCCP Web site, as follows:

- i. Pre-offer self-identification invitation procedures for Communities Unlimited's job applicants as set forth in 41 C.F.R. § 60-741.42 (a);
- ii. Post-offer identification procedures for Communities Unlimited's job applicants as set forth in 41 C.F.R. § 60-741.42 (a); and
- iii. Self-identification invitation procedures for Communities Unlimited's employees as set forth in 41 C.F.R. § 60-741.42 (a).

Ensuring that Communities Unlimited does not compel or coerce an individual to self-identify as an individual with a disability, and that Communities Unlimited keeps all information on self-identification confidential, and maintains it in a data analysis file (rather than in the medical files of individual employees) as set forth in 41 C.F.R. § 60-741.23(d). Communities Unlimited only uses the self-identification information may be used only in accordance with the Section 503 regulations.

- u. Ensuring that Communities Unlimited annually evaluates its utilization of individuals with disabilities in each job group, or in its entire workforce in accordance with 41 C.F.R. § 60-741.45, including the following:
 - i. Ensuring that when the percentage of individuals with disabilities in one or more job groups, or in Communities Unlimited's entire workforce, as applicable, is less than the utilization goal established in the Section 503 regulations, Communities Unlimited takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, Communities Unlimited assesses its personnel processes, the effectiveness of its outreach and recruitment efforts, the results of its affirmative action program audit, and any other areas that might affect the success of its AAP.
 - ii. Ensuring that Communities Unlimited develops and executes action-oriented programs designed to correct any identified problem areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts from among those listed in 41 CFR § 60-741.44 (f)(1) and (f)(2), and/or other actions designed to correct the identified problem areas and attain the established goal.

2. Management Responsibilities 41 C.F.R. § 60-741.44(i)

Line and upper management are advised of their responsibilities for Communities Unlimited's AAP regarding individuals with disabilities within his or her area of responsibility, including but not limited to their obligations to:

- a. Review Communities Unlimited's AAP for individuals with disabilities with subordinate managers and supervisors to ensure they are aware of the policy,

- understand their obligation to comply with it in all personnel actions and understand the need for support at all levels.
- b. Assist in the auditing of plan progress, identification of problem areas, formulation of solutions, establishment of departmental goals and objectives, and development of training programs, when appropriate.
 - c. Review the qualifications of applicants and employees in their area of responsibility to ensure qualified individuals with disabilities are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur.
 - d. Review employees' performance to ensure that illegal discrimination regarding individuals with disabilities does not occur.
 - e. Make available career counseling to employees with known disabilities, when so requested, and as appropriate.
 - f. Review position descriptions to see that they adequately reflect the job to be performed.
 - g. Audit training programs, hiring, and promotion patterns.
 - h. Assist employees and other members of management in the prevention of harassment.
 - i. If an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, Communities Unlimited shall confidentially inquire whether the employee is in need of a reasonable accommodation.
 - j. Show support for Communities Unlimited's AAP.

Affirmative Action Training

41 C.F.R. § 60-741.44(j)

Communities Unlimited provides training and guidance to all personnel who are involved in the recruitment, screening, selection, promotion, disciplinary and other related processes to ensure that its AAP commitments are implemented.