

**Affirmative Action Program for
Minorities and Women**

COMMUNITIES Unlimited, Inc.

Affirmative Action Program for Minorities and Women

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

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COMMUNITIES Unlimited, Inc.

AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND WOMEN

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Introduction

COMMUNITIES Unlimited, Inc. has prepared this Affirmative Action Program (AAP) for the period of August 1, 2021 through July 31, 2022, reaffirming its commitment to the letter and spirit of affirmative action law, including those administered by the U. S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP). Through the implementation of this AAP, 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. The following statement of policy reinforces that belief.

Reaffirming Commitment to Equal Employment Opportunity

In setting forth this AAP Communities Unlimited reaffirms its belief in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

Ines Polonius, CEO of Communities Unlimited, designated Scott Wallace as the Equal Employment Opportunity Administrator (EEO Administrator). Scott Wallace oversees the AAP development, modification, implementation, and reporting requirements and conducts management updates. The EEO Administrator also analyzes Communities Unlimited's selection process to further the principles of equal employment opportunity.

As part of Communities Unlimited's commitment to this overall process, it will seek to ensure affirmative action to provide equality of opportunity in all aspects of employment, and that all personnel activities, such as the recruitment, selection, training, compensation, benefits, discipline, promotion, transfer, layoff, and termination processes remain free of illegal discrimination and harassment based upon race, color, religion, sex, sexual orientation, gender identity, and national origin. Regular review by Communities Unlimited, as described in this AAP, helps ensure compliance with this policy.

Internal Dissemination of EEO Policy

41 C.F.R. § 60-1.42

Communities Unlimited posts copies of the equal employment opportunity notices that comply with 41 C.F.R. § 60-1.42(a) in conspicuous places (including, where applicable, electronic websites) available to employees, applicants for employment, and (if applicable) representatives of each labor union or other organization representing its employees with which Communities Unlimited has a collective-bargaining agreement or other contract or understanding. The following exemplify the methods and locations Communities Unlimited may use in its ongoing efforts to ensure continuing dissemination of its policy and AAP, although Communities Unlimited may not always use each or any of the below methods, and it may use other methods not listed below:

1. Internal employee manuals contain the policy statement.
2. The policy statement is posted on bulletin boards accessible to employees.
3. Communities Unlimited references the policy and progress in its annual report, newspaper, magazine, and other publications.
4. Orientation meetings for new employees and in-house employment-related training include references to Communities Unlimited's policy.
5. Communities Unlimited publications, if any, including those with photographs, generally feature individuals of diverse gender, race, color, and national origin, where feasible.
6. Pertinent portions of Communities Unlimited's Affirmative Action Program are available during regular business hours for inspection by employees and applicants for employment.

External Dissemination of EEO Policy

41 C.F.R. § 60-1.41; 41 C.F.R. § 60-1.5

1. In solicitations or advertisements for employees placed by or on its behalf, Communities Unlimited complies with at least one of the following methods regarding the dissemination of its equal employment opportunity clause:
 - a. Communities Unlimited states expressly in the solicitations or advertising that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin. 41 C.F.R. § 1.41(a).
 - b. Communities Unlimited uses a single advertisement, and the advertisement is grouped with other advertisements under a caption which clearly states that all employers in the group assure all qualified applicants equal consideration for employment without regard

to race, color, religion, sex, sexual orientation, gender identity, or national origin. 41 C.F.R. § 1.41(c).

- c. Communities Unlimited uses a single advertisement in which appears in clearly-distinguishable type the phrase “an equal employment opportunity employer.” 41 C.F.R. § 1.41(d). When pictures are included in these media, where feasible, efforts will be made to include pictures of individuals of diverse gender, race, and national origin.
2. The following exemplify the methods and locations Communities Unlimited may use in its ongoing efforts to ensure continuing dissemination of its policy and AAP, although Communities Unlimited may not always use all of the below methods, and it may use other methods not listed below:
 - a. Communities Unlimited notifies subcontractors, suppliers, and vendors of the policy about both its obligations to equal employment opportunity and about Communities Unlimited’s AAP.
 - b. Communities Unlimited advises recruitment sources, minority and female organizations, community agencies, and colleges of its commitment to this policy and AAP. Communities Unlimited informs these sources that job applicants will be treated fairly without regard to their race, color, religion, sex, sexual orientation, gender identity, and national origin.
 - c. Communities Unlimited communicates with the state employment security office regarding its commitment to the policy.
3. In addition, Communities Unlimited incorporates by reference the equal employment opportunity and affirmative action clauses into each of its covered federal contracts and subcontracts, including federal agency bills of lading, transportation requests, and such other covered contracts and covered subcontracts as required by law, purchase orders, lease agreements, Government contracts, and other covered contracts (and modifications thereof if not included in the original contract) in accordance with 41. C.F.R. § 60-1.4 (a) – (c) (unless exempted under 41 C.F.R. § 60-1.5).

Establishment of Responsibility for Implementation of the AAP

41 C.F.R. § 60-2.17(a)

A. Identification and Responsibilities of EEO Administrator

Overall responsibility for Communities Unlimited's AAP rests with the EEO Administrator, Scott Wallace. Scott Wallace ensures the AAP complies with all applicable laws, orders, and regulations, including but not limited to Executive Orders 11246, 13496, and their progeny. Specifically, Scott Wallace or the designated representative's duties include:

1. Developing, maintaining, and modifying, where appropriate, Communities Unlimited's AAP to ensure compliance with the EEO/AA law.
2. Developing and modifying, where appropriate procedures for effectively communicating the AAP and its elements both internally and externally.
3. Advising management on EEO/AA progress, reporting potential EEO/AA problem areas, and assisting management in finding equitable solutions, where feasible, to any identifiable EEO/AA problem areas.
4. Evaluating the effectiveness of Communities Unlimited's AAP on a regular basis and reporting to management.
5. Designing, implementing, and overseeing audit and reporting systems that periodically measure the effectiveness of the total affirmative action program. 41 C.F.R. § 2.17 (d)(1)-(4), identifying need for remedial action, and determining the degree to which objectives have been achieved.
6. Acting as Company representative and liaison with any government agencies regarding this AAP.
7. Monitoring Company policies and procedures with regard to terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
8. Auditing the content of Communities Unlimited's bulletin board and electronic policies, as appropriate, to ensure compliance information is posted and up to date.
9. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
10. Serving as a liaison between Communities Unlimited and organizations, such as minority organizations and women's organizations.
11. When necessary, developing sales and management training programs to increase protected-group participation.
12. Assisting in the investigation, handling, and disposition of employee harassment and discrimination complaints.

13. Discussing EEO/AA policies with all personnel, including management, to ensure Communities Unlimited's policies and the need for their support are understood at all levels.
14. Reviewing Communities Unlimited's AAP for qualified women and minorities with all managers and supervisors to ensure the policy is understood and followed in all personnel actions.
15. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, comparable facilities for both sexes, and opportunity for participation in Company-sponsored recreational, educational, and social activities.
16. Auditing training programs, hiring, and promotion patterns.

B. Management Responsibilities

Line and upper management share responsibility for the AAP, including but not limited to the following:

1. Assisting in auditing AAP progress, including identifying problem areas, formulating solutions, establishing appropriate goals, and developing necessary training programs.
2. Reviewing the qualifications of applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner in hiring, promotion, transfers, and termination actions.
3. Making available career counseling, when appropriate.
4. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee and his or her duties.
5. Reviewing position descriptions of the jobs in the manager's area or department to see that they adequately reflect the job to be performed.
6. Assisting subordinates and upper management in the prevention of harassment.

Identification of Areas for Discussion

41 C.F.R. § 60-2.17(b)

Communities Unlimited's commitment to fully implement this policy and AAP include periodic reviews of its total employment process to determine whether and where impediments to equal employment opportunity exist. These reviews include:

1. The workforce by organizational unit and job group of minority or female utilization and distribution;
2. Personnel activity to determine whether there are selection disparities;
3. Compensation systems to determine if there are gender-, race-, or ethnicity-based disparities;
4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in employment or placement disparities of minorities or women; and,
5. Any other areas that might impact the success of the affirmative action program. 41 C.F.R. § 2.17 (b)(1)-(5), including, for example, Communities Unlimited's review of:
 - a. The workforce composition by race and sex to compare it to the availability of these groups;
 - b. Communities Unlimited's applicant flow compared to the availability for the protected groups;
 - c. A comparison of hires to applicants pertaining to minorities and women;
 - d. Selection forms, such as applications for employment, to ensure they comply with federal and state employment laws;
 - e. Processes to ensure there are no artificially-created barriers or restrictive seniority provisions; and,
 - f. Training opportunities to ensure they are available to minorities and women.

Identification of problem areas are discussed in the next section titled Narrative Discussion of Goals.

Narrative Discussion of Goals

The Communities Unlimited plan has 67 employees, including 25 minorities and 33 females. There were no goals for minorities and/or women in this plan.

- 1.1 - Executives/Senior Level Officials and Managers - This group consists of 7 employees, of whom 2 are minorities and 6 are females. There is no need to set a placement goal at this time for minorities or females.
- 1.2 - First/Mid-Level Officials and Managers - This group consists of 10 employees, of whom 4 are minorities and 3 are females. There is no need to set a placement goal at this time for minorities or females.
- 2 - Professionals - This group consists of 36 employees, of whom 14 are minorities and 16 are females. There is no need to set a placement goal at this time for minorities or females.
- 3 - Technicians - This group consists of 7 employees, of whom 4 are minorities and 3 are females. There is no need to set a placement goal at this time for minorities or females.
- 5 - Administrative Support Workers - This group consists of 7 employees, of whom 1 is a minority and 5 are females. There is no need to set a placement goal at this time for minorities or females.

Communities Unlimited will use alternate recruitment sources, when necessary, to attract more qualified external applicants. In those instances where statistical disparities are indicated, Communities Unlimited will take action as outlined in the Action-Oriented Programs Section to monitor and eliminate any problem areas, as well as other similar actions.

Development and Execution of Action-Oriented Programs

41 C.F.R. § 60-2.17(c)

Communities Unlimited has instituted action-oriented programs designed to eliminate any problem areas, should they exist, in accordance with § 60-2.17(b), and to help achieve specific affirmative action goals. Communities Unlimited will make good-faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results. These programs may include items such as:

1. Conducting periodic reviews of job descriptions attempting to ensure they accurately reflect job-related duties and responsibilities.
2. Reviewing job qualifications by department and job title for job-relatedness, and using job performance criteria.
3. Making job descriptions and qualifications available to recruiting sources and to all members of management involved in the recruiting, screening, selection, and promotion processes.
4. Making good-faith efforts to select the most qualified candidates. Accordingly, Communities Unlimited evaluates its total selection process to ensure selections are made in a nondiscriminatory manner through:
 - a. Annual reviews of job applications and other pre-employment forms to ensure information requested is job-related;
 - b. Annual evaluations of selection methods that may result in statistical disparities to ensure they are non-discriminatory;
 - c. Annual provisions of assistance, such as training and guidance on proper interviewing techniques and EEO training, to employees, management, and supervisory staff, including, but not limited to, those who are involved in the recruitment, selection, discipline, and other related processes, so that personnel actions are made in a nondiscriminatory manner; and
 - d. Annual review of selection techniques and employment standards.
5. Communities Unlimited employs appropriate methods to attempt to improve recruitment and increase the flow of qualified minorities and women applicants in its recruiting process, including a number of the following actions:
 - a. Disseminating information on job opportunities to organizations representing minorities, women, and employment development agencies when job opportunities occur;
 - b. Encouraging all employees to refer qualified applicants;
 - c. Actively recruiting in colleges and universities with predominantly minority or female enrollments where underutilization exists in such areas, and

- d. Requesting employment agencies to refer qualified minorities and women.
 - e. Whenever feasible and appropriate, Communities Unlimited participates in job fairs, career days, youth-motivation programs, and other programs that foster exposure for qualified minorities and women.
 - f. Communities Unlimited encourages all employees to participate in Company-sponsored activities and programs.
 - g. Communities Unlimited utilizes various community organizations and schools as referral sources.
6. Communities Unlimited reviews promotion criteria and procedures so that job qualifications form the basis for the promotional decisions. Communities Unlimited monitors promotion rates for minorities and women and, when necessary, may employ one or more of the following procedures:
- a. Providing job training, job-related courses, or certificate programs.
 - b. Reviewing work specifications and job qualifications to ensure job-relatedness.
 - c. Conducting career counseling, where appropriate, during performance evaluations.
 - d. Informing employees about educational programs and other opportunities available to improve their employment prospects.
 - e. Reviewing Company-sponsored social and recreational activities to ensure non-discriminatory participation and availability.
 - f. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
 - 1. Generally posting or otherwise announcing promotional opportunities.
 - 2. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
 - 3. Evaluating job requirements for promotion.

Internal Audit and Reporting System

41 C.F.R. § 60-2.17(d)

1. Scott Wallace, Communities Unlimited's EEO Administrator, maintains an internal audit system to attempt to oversee Communities Unlimited's Affirmative Action Program and assess progress. The EEO Administrator is responsible for ensuring that the formal AAP documents are developed and prepared and for the effective AAP implementation; however, responsibility is likewise vested with each department manager and supervisor, depending upon the specific responsibility. The audit system is designed and implemented to measure the effectiveness of the total affirmative action program [41 C.F.R. § 2.17 (d)(1)-(4)], including:
 - a. Monitoring records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation at all levels, to ensure the nondiscriminatory policy is carried out,
 - b. Requiring internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained,
 - c. Reviewing reports at all levels of management; and
 - d. Advising top management of the program's effectiveness and submitting recommendations to improve unsatisfactory performance. 41 C.F.R. § 2.17 (d)(1)-(4).
2. Communities Unlimited reviews various employment decisions, such as job referrals, hiring decisions, transfers, promotions, and terminations. Communities Unlimited maintains summary data where necessary and feasible, and conducts regular reviews at least annually.
3. There is no "de facto" (in practice without being officially established) segregation. Further, Communities Unlimited ensures that facilities, as broadly defined in 41 C.F.R. § 60-1.8, provided for employees are provided in such a manner that segregation on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin cannot result, provided that separate or single-user restrooms and necessary dressing or sleeping areas shall be provided to ensure privacy between the sexes.
4. Communities Unlimited complies with required records retention provisions set forth in 41 C.F.R. § 60-1.12 and elsewhere in the applicable OFCCP regulations, and maintains a)
employment applications (generally for two years); b) summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants, where necessary and feasible, and conducts regular reviews at least annually; c) applicant flow showing the name, race, sex, date of application, job title, interview status, and the action taken for all individuals applying for job opportunities, and the relevant applicant/hire decisions; d) summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification; and e) records pertaining to its compensation system.
5. Provide needed reports to managers and supervisors regarding the results of the audit as well as Communities Unlimited's overall progress in the area of EEO/AA. Any recommended actions should be made as well. Reports shall be made to senior management on at least an annual basis.

Guidelines for Prevention of Sex Discrimination

41 C.F.R. § 60-20.1 et seq.

Communities Unlimited supports the promotion and ensuring of equal employment opportunity of its employees and applicants without regard to sex, and endorses and complies with the following policy statements:

1. Communities Unlimited does not discriminate against any employee or applicant for employment because of sex. The term sex includes, but is not limited to, pregnancy, childbirth, or related medical conditions; gender identity; transgender status; and sex stereotyping. 41 C.F.R. §60-20.2(a).
2. Communities Unlimited maintains gender-neutral personnel policies that expressly indicate that there shall be no unlawful discrimination against employees based on sex. Unless sex is a bona fide occupational qualification reasonably necessary to the normal operation of business, Communities Unlimited will not make any distinction based on sex in recruitment, hiring, firing, promotion, compensation, hours, job assignments, training, benefits, or other terms, conditions, or privileges of employment. The terms and conditions of any written collective bargaining agreements shall not be inconsistent with these guidelines. 41 C.F.R. §60-20.2(b).
3. Communities Unlimited will not make any distinction between married and unmarried persons of one sex that is not made between married and unmarried persons of the opposite sex; or deny employment to women with children unless it has the same exclusionary policies for men; or steer women into lower-paying or less desirable jobs on the basis of sex; or impose any differences in retirement age or other terms, conditions, or privileges of retirement on the basis of sex. 41 C.F.R. § 60.20.2(b).
4. Communities Unlimited does not maintain seniority lines and lists on the basis of sex. 41 C.F.R. § 60-20.2(b).
5. Communities Unlimited's employment advertisements do not express a sex preference nor does Communities Unlimited place advertisements in columns designated "males" or "females", unless sex is a bona fide occupational qualification reasonably necessary to the normal operation of business. 41 C.F.R. §60-20.2(b).
6. All employees at Communities Unlimited shall have an equal opportunity to any available job that he or she is qualified to perform, unless sex is a bona fide occupational qualification. 41 C.F.R. §60-20.2(b).
7. Communities Unlimited will not deny transgender employees access to the restrooms or similar facilities designated for use by the gender with which they identify. 41 C.F.R. §60-20.2(b).
8. Communities Unlimited will not treat employees or applicants adversely because they have received or are planning to receive transition-related medical services designed to facilitate the adoption of a sex or gender other than the individual's designated sex at birth. 41 C.F.R. §60-20.2(b).

9. Communities Unlimited does not hire or employ employees on the basis of sex unless sex is a bona fide occupational qualification reasonably necessary to the normal operation of business. 41 C.F.R. §60-20.3.
10. Communities Unlimited does not engage in any employment practice that discriminates in wages, benefits, or any other forms of compensation, or denies access to earnings opportunities, because of sex. 41 C.F.R §60-20.4.
11. All employees of Communities Unlimited have equal opportunity to obtain regular and/or overtime hours, commissions, pay increases, incentive compensation, or any other additions to regular earnings. 41 C.F.R §60-20.4.
12. Communities Unlimited's wage schedules are not related to or based on sex, but rather are based on job relatedness and are consistent with business necessity. 41 C.F.R §60-20.4.
13. Communities Unlimited does not discriminate on the basis of pregnancy, childbirth, or related medical conditions, including childbearing capacity. 41 C.F.R. § 60-20.5.
14. Any fringe benefits, which include but are not limited to medical, hospital, accident, life insurance and retirement benefits; profit-sharing and bonus plans; leave, etc. that are offered by Communities Unlimited, are not based on sex. 41 C.F.R. § 60-20.6.
15. Communities Unlimited does not make employment decisions on the basis of sex-based stereotypes, such as stereotypes about how males and/or females are expected to look, speak, or act. 41 C.F.R. § 60-20.7.
16. Communities Unlimited has a no tolerance policy regarding harassment and hostile work environments. Harassment on the basis of sex includes unwelcome sexual advances, requests for sexual favors, offensive remarks about a person's sex, and other verbal or physical conduct of a sexual nature. Harassment because of sex includes sexual harassment (including sexual harassment based on gender identity or transgender status); harassment based on pregnancy, childbirth, or related medical conditions; and harassment that is not sexual in nature but that is because of sex or sex-based stereotypes. 41 C.F.R. § 60-20.8.
17. When appropriate, Communities Unlimited makes affirmative efforts to increase the number and percentage of women in the workforce, including, but not limited to the following:
 - a. Communities Unlimited recruits women and encourages existing women employees to apply for positions historically labeled by society as "traditionally male".
 - b. Communities Unlimited guarantees equal, gender-neutral access to training and tuition reimbursement programs, including management training and other types of workplace training programs.
 - c. Communities Unlimited informs management of its affirmative action responsibilities.

Policy with Respect to Religion/National Origin

41 C.F.R. § 60-50.1 et seq.

Pursuant to the guidelines prohibiting discrimination on the basis of religion and/or national origin, 41 C.F.R. § 60-50.1, et seq., Communities Unlimited hereby reaffirms that it does not discriminate against employees, or applicants for employment, because of religion or national origin. Communities Unlimited takes affirmative action to seek to ensure that employees or applicants for employment are treated without regard to their religion or national origin in all aspects of the terms and conditions of employment, such as upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay (or other forms of compensation), and selection for training.

Communities Unlimited has reviewed its employment practices and determined that its employees, including those who belong to religious or ethnic groups, have received fair consideration for job opportunities. Based upon its review, and depending upon the circumstances, Communities Unlimited will undertake appropriate actions, which may include one or more of the following activities:

1. Issuing a policy directive to employees reaffirming Communities Unlimited's obligation to provide equal employment opportunity without regard to religion or national origin. This policy will be communicated in such a manner as to foster understanding, acceptance, and support among executives, managers, supervisors, and other employees, and to encourage such persons to take the necessary action to aid Communities Unlimited in meeting its obligations.
2. Developing internal procedures to ensure Communities Unlimited's obligation to provide equal employment opportunity, without regard to religion or national origin, is fully implemented. Specifically, employment activities are reviewed by the EEO Administrator.
3. Informing management annually of its commitment to equal employment opportunity, without regard to religion or national origin.
4. Enlisting the assistance and support of recruitment sources for this commitment.

Communities Unlimited acknowledges its responsibility to make reasonable accommodations for the religious observances and practices of its existing or prospective employees under the terms of Title VII of the Civil Rights Act of 1964. An accommodation for religious purposes will be denied should Communities Unlimited determine that the company would have to suffer undue hardship. During this accommodation evaluation, the following factors will continue to be considered by Communities Unlimited:

1. Business necessity;
2. Financial costs and expenses; and
3. Resulting personnel problems.

Organizational Profile

Contractors and subcontractors are required to include in their AAPs an organizational profile of their workforce using either a “workforce analysis” or “organizational display” that provides detailed data reflecting staffing patterns within the establishment. 41 C.F.R. § 60-2.11. An organizational profile shows the staffing pattern within a contractor’s establishment. This profile assists an employer in identifying where, in the workforce of its site which is the subject of this AAP, women or minorities are underrepresented or concentrated. A workforce analysis is used in this AAP, which lists each job title from the lowest paid to the highest paid within each department or similar organizational unit.

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

ACC

Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Staff Accountant	2	06	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Chief Financial Officer	1.1	10	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Summary of ACC			2	0	0	0	0	0	0	0	0	0
				2	2	0	0	0	0	0	0	

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

CEO

Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Chief Executive Officer	1.1	14	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Summary of CEO			1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

COMSUS

Title	EEO	Salary	Total	Male	Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
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Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Community Facilitator	2	06	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Community Environmental Management Specialist	2	06	1	1	0	0	1	0	0	0	0	1
				0	0	0	0	0	0	0	0	
Director of Community Sustainability	1.1	08	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Summary of COMSUS			3	1	0	0	1	0	0	0	0	1
				2	2	0	0	0	0	0	0	

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

ENVSER

Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Administrative Assistant Environmental Services	5	04	1	0	0	0	0	0	0	0	0	1
				1	0	0	1	0	0	0	0	
Community Environmental Management Technician	3	05	7	4	3	1	0	0	0	0	0	4
				3	0	0	1	1	0	1	0	
Community Environmental Management Specialist	2	06	15	6	3	2	1	0	0	0	0	6
				9	6	2	1	0	0	0	0	
Community Environmental Management Advisor	2	07	2	2	1	0	0	0	0	1	0	1
				0	0	0	0	0	0	0	0	
Regional Environmental Training Coordinator	2	07	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Senior Environmental Management Consultant	2	07	3	3	1	0	1	0	0	1	0	2
				0	0	0	0	0	0	0	0	
ArkaNoas Coordinator - Environmental Services	1.2	07	1	1	0	1	0	0	0	0	0	1
				0	0	0	0	0	0	0	0	
Environmental Services Program Coordinator	1.2	07	1	1	1	0	0	0	0	0	0	0
				0	0	0	0	0	0	0	0	
West Texas Coordinator	1.2	07	1	1	1	0	0	0	0	0	0	0
				0	0	0	0	0	0	0	0	
LouisiaNoa Coordinator - Environmental Services	1.2	07	1	1	1	0	0	0	0	0	0	0
				0	0	0	0	0	0	0	0	
Oklahoma Coordinator - Environmental Services	1.2	08	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

ENVSER

Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Area Director of Environmental Services - AL, MS, TN	1.2	08	1	1	0	1	0	0	0	0	0	1
				0	0	0	0	0	0	0	0	
Texas Director - Environmental Services	1.2	09	1	1	0	1	0	0	0	0	0	1
				0	0	0	0	0	0	0	0	
Director of Environmental Services	1.1	11	1	1	0	0	0	0	0	1	0	1
				0	0	0	0	0	0	0	0	
Summary of ENVSER			37	22	11	6	2	0	0	3	0	18
				15	8	2	3	1	0	1	0	

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

ETPS

Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Associate Management Associate	2	06	1	1	0	0	1	0	0	0	0	1
				0	0	0	0	0	0	0	0	
Management Consultant	2	06	5	4	2	1	0	1	0	0	0	2
				1	1	0	0	0	0	0	0	
Senior Management Consultant	1.2	06	1	1	1	0	0	0	0	0	0	0
				0	0	0	0	0	0	0	0	
Director of Entrepreneurship	1.1	09	1	0	0	0	0	0	0	0	0	1
				1	0	1	0	0	0	0	0	
Summary of ETPS			8	6	3	1	1	1	0	0	0	4
				2	1	1	0	0	0	0	0	

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

LEN

Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Program Assistant - Lending	5	04	2	0	0	0	0	0	0	0	0	0
				2	2	0	0	0	0	0	0	
Lending Assistant	2	05	1	1	0	1	0	0	0	0	0	1
				0	0	0	0	0	0	0	0	
Senior Loan Officer	2	07	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Director of Lending	1.1	10	1	0	0	0	0	0	0	0	0	0
				1	1	0	0	0	0	0	0	
Summary of LEN			5	1	0	1	0	0	0	0	0	1
				4	4	0	0	0	0	0	0	

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

PSS													
Title	EEO	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority	
Receptionist	5	03	1	0	0	0	0	0	0	0	0	0	
				1	1	0	0	0	0	0	0		
Program Assistant	5	04	1	0	0	0	0	0	0	0	0	0	
				1	1	0	0	0	0	0	0		
Staff Writer	2	04	1	1	1	0	0	0	0	0	0	0	
				0	0	0	0	0	0	0	0		
GIS Technician	5	05	2	2	2	0	0	0	0	0	0	0	
				0	0	0	0	0	0	0	0		
IT - 0365/SharePoint	2	06	1	0	0	0	0	0	0	0	0	0	
				1	1	0	0	0	0	0	0		
IT Special Projects	2	06	1	1	1	0	0	0	0	0	0	0	
				0	0	0	0	0	0	0	0		
Communications Coordinator	1.2	06	1	0	0	0	0	0	0	0	0	0	
				1	1	0	0	0	0	0	0		
GIS Specialist	2	07	1	0	0	0	0	0	0	0	0	0	
				1	1	0	0	0	0	0	0		
Healthy Foods Coordinator	1.2	07	1	0	0	0	0	0	0	0	0	1	
				1	0	1	0	0	0	0	0		
Director of Program Support Services / HR	1.1	11	1	0	0	0	0	0	0	0	0	0	
				1	1	0	0	0	0	0	0		
Summary of PSS			11	4	4	0	0	0	0	0	0	1	
				7	6	1	0	0	0	0	0		

Workforce Analysis

Plan Date: 08/01/2021

Communities Unlimited

Title	Total	Male Female	White	Black	Hispanic	Asian	NatPacifi c Islander	Native American	Two or More	Minority
Summary	67	34	18	8	4	1	0	3	0	25
		33	24	4	3	1	0	1	0	

Job Group Analysis

Contractors and subcontractors are required to include in their AAPs a “job group analysis” by combining jobs at the establishment with similar content, wage rates, and opportunities to form job groups. 41 C.F.R. § 60-2.12. The job group analysis is a contractor’s first comparison of the representation of minorities and women in its workforce with the estimated availability of minorities and women to be employed. The job group is created by first sorting the various jobs at the establishment into job groups, which is a collection of jobs in an organization with similar job content (field of work and/or skill level), similar promotional opportunities, and similar compensation. The job groups then are developed to fit the unique characteristics of each organizational unit, taking into account the size, type, and complexity of the work performed. Contractors, after combining the job titles for the job group analysis, must then separately provide the percentage of minorities and the percentage of women they employ in each job group.

Job Group Analysis

Plan Date: 08/01/2021

Communities Unlimited

1.1 - Executives/Senior Level Officials and Managers				EEO: Executives/Senior Level Officials and Managers							
Title	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Director of Community Sustainability	08	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Director of Entrepreneurship	09	1	0	0	0	0	0	0	0	0	1
			1	0	1	0	0	0	0	0	
Chief Financial Officer	10	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Director of Lending	10	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Director of Environmental Services	11	1	1	0	0	0	0	0	1	0	1
			0	0	0	0	0	0	0	0	
Director of Program Support Services / HR	11	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Chief Executive Officer	14	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Summary of 1.1 - Executives/Senior Level Officials and Managers		7	1	0	0	0	0	0	1	0	2
			6	5	1	0	0	0	0	0	

Job Group Analysis

Plan Date: 08/01/2021

Communities Unlimited

1.2 - First/Mid-Level Officials and Managers			EEO: First/Mid-Level Officials and Managers								
Title	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Senior Management Consultant	06	1	1	1	0	0	0	0	0	0	0
			0	0	0	0	0	0	0	0	
Communications Coordinator	06	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Healthy Foods Coordinator	07	1	0	0	0	0	0	0	0	0	1
			1	0	1	0	0	0	0	0	
ArkaNoas Coordinator - Environmental Services	07	1	1	0	1	0	0	0	0	0	1
			0	0	0	0	0	0	0	0	
Environmental Services Program Coordinator	07	1	1	1	0	0	0	0	0	0	0
			0	0	0	0	0	0	0	0	
West Texas Coordinator	07	1	1	1	0	0	0	0	0	0	0
			0	0	0	0	0	0	0	0	
LouisiaNoa Coordinator - Environmental Services	07	1	1	1	0	0	0	0	0	0	0
			0	0	0	0	0	0	0	0	
Oklahoma Coordinator - Environmental Services	08	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Area Director of Environmental Services - AL, MS, TN	08	1	1	0	1	0	0	0	0	0	1
			0	0	0	0	0	0	0	0	
Texas Director - Environmental Services	09	1	1	0	1	0	0	0	0	0	1
			0	0	0	0	0	0	0	0	
Summary of 1.2 - First/Mid-Level Officials and Managers		10	7	4	3	0	0	0	0	0	4
			3	2	1	0	0	0	0	0	

Job Group Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

EEO: Professionals

Title	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Staff Writer	04	1	1	1	0	0	0	0	0	0	0
			0	0	0	0	0	0	0	0	
Lending Assistant	05	1	1	0	1	0	0	0	0	0	1
			0	0	0	0	0	0	0	0	
Community Facilitator	06	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
IT - O365/SharePoint	06	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Staff Accountant	06	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Associate Management Associate	06	1	1	0	0	1	0	0	0	0	1
			0	0	0	0	0	0	0	0	
Management Consultant	06	5	4	2	1	0	1	0	0	0	2
			1	1	0	0	0	0	0	0	
Community Environmental Management Specialist	06	16	7	3	2	2	0	0	0	0	7
			9	6	2	1	0	0	0	0	
IT Special Projects	06	1	1	1	0	0	0	0	0	0	0
			0	0	0	0	0	0	0	0	
GIS Specialist	07	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Community Environmental Management Advisor	07	2	2	1	0	0	0	0	1	0	1
			0	0	0	0	0	0	0	0	
Senior Loan Officer	07	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	

Job Group Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals			EEO: Professionals								
Title	Salary	Total	Male	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Regional Environmental Training Coordinator	07	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Senior Environmental Management Consultant	07	3	3	1	0	1	0	0	1	0	2
			0	0	0	0	0	0	0	0	
Summary of 2 - Professionals		36	20	9	4	4	1	0	2	0	14
			16	13	2	1	0	0	0	0	

Job Group Analysis

Plan Date: 08/01/2021

Communities Unlimited

3 - Technicians			EEO: Technicians								
Title	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Community Environmental Management Technician	05	7	4	3	1	0	0	0	0	0	4
			3	0	0	1	1	0	1	0	
Summary of 3 - Technicians		7	4	3	1	0	0	0	0	0	4
			3	0	0	1	1	0	1	0	

Job Group Analysis

Plan Date: 08/01/2021

Communities Unlimited

5 - Administrative Support Workers			EEO: Administrative Support Workers								
Title	Salary	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Receptionist	03	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Administrative Assistant Environmental Services	04	1	0	0	0	0	0	0	0	0	1
			1	0	0	1	0	0	0	0	
Program Assistant	04	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	
Program Assistant - Lending	04	2	0	0	0	0	0	0	0	0	0
			2	2	0	0	0	0	0	0	
GIS Technician	05	2	2	2	0	0	0	0	0	0	0
			0	0	0	0	0	0	0	0	
Summary of 5 - Administrative Support Workers		7	2	2	0	0	0	0	0	0	1
			5	4	0	1	0	0	0	0	

Job Group Analysis

Plan Date: 08/01/2021

Communities Unlimited

Title	Total	Male Female	White	Black	Hispanic	Asian	Pacific Islander	Native American	Two or More	Minority
Summary	67	34	18	8	4	1	0	3	0	25
		33	24	4	3	1	0	1	0	

Availability Analysis

Contractors and covered Federal subcontractors, after aggregating individual jobs into job groups, are then required to determine the availability of women and minorities for those job groups. 41 C.F.R. § 60-2.14. “Availability” is a percentage estimate of the women and minorities who have the skills required to perform the jobs within the job groups. To determine the availability percentages, contractors are required to consider two factors: 1) factors reflecting the availability outside the contractor’s workforce (such as people in the immediate labor area or reasonable recruitment area); and, 2) factors affecting the availability inside the contractor’s own workforce (such as people who are qualified and available by transfer, promotion, or training). Contractors typically rely on the most current U.S. Census data to develop their external availability factors, and on their own workforce numbers to develop their internal availability factors. Both external and internal factors must be considered, but contractors may “weight” each of the two factors according to each factor’s relevance to the job group in question. Such weighting is included in the following availability statistics for each job group.

After a contractor has formulated job groups and determined the minority and female availability percentages for each job group, it must then compare the actual utilization of minorities and women in each job group with their estimated availability, and identify those job groups where the percentage of women and/or minorities employed is less than would reasonably be expected given their availability. 41 C.F.R. § 60-2.15.

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

1.1 - Executives/Senior Level Officials and Managers

Factor	Description	<u>Raw Statistics</u>			<u>Weighted Factor</u>		Source of Statistics	Reason for Weighting
		Minority	Female	Weight	Minority	Female		
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	14	38	100	14	38	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	0	0	0	0	0	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
Job Group Size: 7		100						
		Final Availability (%)			14	38		

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

1.1 - Executives/Senior Level Officials and Managers

Factor 1: External Availability

External Availability from the RRA

Census Areas for RRA		Value		
	Shelby	1		
	Census Codes used for RRA		Raw Statistics (%)	
			Minority	Female
				Value
	0010 Chief executives and legislators		18	22
	0020 General and operations managers		23	24
	0120 Financial managers		32	42
	0136 Human resources managers		34	64
	0430 Miscellaneous managers, including funeral service managers a		34	35
	Little Rock-North Little Rock-Conway AR	1		
	Census Codes used for RRA		Raw Statistics (%)	
			Minority	Female
				Value
	0010 Chief executives and legislators		10	24
	0020 General and operations managers		15	19
	0120 Financial managers		13	57
	0136 Human resources managers		21	56
	0430 Miscellaneous managers, including funeral service managers a		20	33
	Fayetteville-Springdale-Rogers AR-MO	4		
	Census Codes used for RRA		Raw Statistics (%)	
			Minority	Female
				Value
	0010 Chief executives and legislators		4	22

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

1.1 - Executives/Senior Level Officials and Managers

Factor 1: External Availability

0020 General and operations managers	11	24	1	
0120 Financial managers	11	44	2	
0136 Human resources managers	21	63	1	
0430 Miscellaneous managers, including funeral service managers a	7	33	2	
<div><div>Raw Statistics (%)</div><div>MinorityFemaleValue</div><div>Weighted Factor (%)</div><div>MinorityFemale</div></div>				
Final Statistics for External Availability	14	38	100	1438

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

1.2 - First/Mid-Level Officials and Managers

Factor	Description	<u>Raw Statistics</u>			<u>Weighted Factor</u>		Source of Statistics	Reason for Weighting
		Minority	Female	Weight	Minority	Female		
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	0	0	0	0	0	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	39	44	100	39	44	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
Job Group Size: 10		100						
		Final Availability (%)			39	44		

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

1.2 - First/Mid-Level Officials and Managers					
Factor 2: Internal Availability					
Source Description	Raw Statistics (%)				
	Minority	Female	Value		
2 - Professionals	39	44	8		
	Raw Statistics (%)			Weighted Factor (%)	
	Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability	39	44	100	39	44

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor	Description	<u>Raw Statistics</u>			<u>Weighted Factor</u>		Source of Statistics	Reason for Weighting
		Minority	Female	Weight	Minority	Female		
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	36	61	80	29	49	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	57	43	20	11	9	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
Job Group Size: 36		100						
		Final Availability (%)			40	58		

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor 1: External Availability

External Availability from the RRA

Census Areas for RRA		Value		
	Ouachita	1		
	Census Codes used for RRA		Raw Statistics (%)	
			Minority	Female
				Value
	0420 Social and community service managers		78	67
	0710 Management analysts		0	43
	0800 Accountants and auditors		9	69
	0910 Credit counselors and loan officers		60	51
	0950 Financial specialists, all other		0	0
	1006 Computer systems analysts		0	53
	1020 Software developers, applications and systems software		0	22
	1310 Surveyors, cartographers, and photogrammetrists		0	0
	2016 Social and human service assistants		36	100
				16
	Clay+Oktibbeha	1		
	Census Codes used for RRA		Raw Statistics (%)	
			Minority	Female
				Value
	0137 Training and development managers		100	0
	0420 Social and community service managers		84	60
	0710 Management analysts		0	0
	0800 Accountants and auditors		12	67
				1

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor 1: External Availability

0910 Credit counselors and loan officers				43	57	1	
1006 Computer systems analysts				20	13	1	
1020 Software developers, applications and systems software				14	0	1	
1310 Surveyors, cartographers, and photogrammetrists				0	0	1	
2016 Social and human service assistants				25	100	16	
2840 Technical writers				0	0	1	
	Adair+Cherokee+Sequoyah	1					
	Census Codes used for RRA			Raw Statistics (%)			
			Minority	Female	Value		
0420 Social and community service managers				48	68	1	
0710 Management analysts				100	100	11	
0800 Accountants and auditors				40	66	1	
0910 Credit counselors and loan officers				33	83	1	
0950 Financial specialists, all other				27	100	1	
1006 Computer systems analysts				0	27	1	
1020 Software developers, applications and systems software				0	100	1	
1310 Surveyors, cartographers, and photogrammetrists				0	50	1	
2016 Social and human service assistants				54	92	16	
	Le Flore	1					
	Census Codes used for RRA			Raw Statistics (%)			
			Minority	Female	Value		

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor 1: External Availability

0420 Social and community service managers	100	100	1	
0710 Management analysts	0	0	11	
0800 Accountants and auditors	11	78	1	
0910 Credit counselors and loan officers	0	60	1	
1006 Computer systems analysts	0	100	1	
2016 Social and human service assistants	60	100	16	
2840 Technical writers	0	100	1	
Atoka+Bryan+Coal	1	Raw Statistics (%) Minority Female Value		
Census Codes used for RRA				
0420 Social and community service managers	8	92	1	
0710 Management analysts	25	20	11	
0800 Accountants and auditors	3	76	1	
0910 Credit counselors and loan officers	0	8	1	
1310 Surveyors, cartographers, and photogrammetrists	0	0	1	
2016 Social and human service assistants	14	100	16	
Noble+Osage+Pawnee	1	Raw Statistics (%) Minority Female Value		
Census Codes used for RRA				
0137 Training and development managers	0	0	1	
0420 Social and community service managers	33	100	1	

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor 1: External Availability

0710 Management analysts				37	56	11	
0800 Accountants and auditors				35	84	1	
0910 Credit counselors and loan officers				40	80	1	
0950 Financial specialists, all other				0	0	1	
1006 Computer systems analysts				0	73	1	
1020 Software developers, applications and systems software				0	27	1	
1310 Surveyors, cartographers, and photogrammetrists				0	100	1	
2016 Social and human service assistants				20	100	16	
2840 Technical writers				0	0	1	
	Bee+Goliad+Karnes	1	Raw Statistics (%)				
	Census Codes used for RRA		Minority	Female	Value		
0420 Social and community service managers				12	24	1	
0710 Management analysts				0	0	11	
0800 Accountants and auditors				12	71	1	
0910 Credit counselors and loan officers				23	77	1	
1020 Software developers, applications and systems software				100	0	1	
2016 Social and human service assistants				100	100	16	
	Florence-Muscle Shoals AL	1	Raw Statistics (%)				
	Census Codes used for RRA		Minority	Female	Value		

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals				
Factor 1: External Availability				
0420 Social and community service managers	0	100	1	
0710 Management analysts	16	56	11	
0800 Accountants and auditors	3	74	1	
0910 Credit counselors and loan officers	0	67	1	
0950 Financial specialists, all other	36	71	1	
1006 Computer systems analysts	0	55	1	
1020 Software developers, applications and systems software	0	28	1	
1310 Surveyors, cartographers, and photogrammetrists	0	13	1	
2016 Social and human service assistants	38	100	16	
2840 Technical writers	0	100	1	
Oklahoma City OK	1	Raw Statistics (%)		
Census Codes used for RRA		Minority	Female	Value
0137 Training and development managers		10	62	1
0420 Social and community service managers		25	68	1
0710 Management analysts		22	55	11
0800 Accountants and auditors		20	66	1
0910 Credit counselors and loan officers		20	63	1
0950 Financial specialists, all other		36	84	1
1006 Computer systems analysts		24	32	1

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor 1: External Availability

1020 Software developers, applications and systems software	25	27	1	
1310 Surveyors, cartographers, and photogrammetrists	3	38	1	
2016 Social and human service assistants	52	62	16	
2840 Technical writers	6	50	1	
Longview TX	1	Raw Statistics (%) Minority Female Value		
Census Codes used for RRA				
0137 Training and development managers	0	0	1	
0420 Social and community service managers	19	76	1	
0710 Management analysts	0	34	11	
0800 Accountants and auditors	17	66	1	
0910 Credit counselors and loan officers	22	83	1	
0950 Financial specialists, all other	30	60	1	
1006 Computer systems analysts	0	59	1	
1020 Software developers, applications and systems software	0	27	1	
1310 Surveyors, cartographers, and photogrammetrists	0	0	1	
2016 Social and human service assistants	6	56	16	
2840 Technical writers	0	0	1	
El Paso TX	1	Raw Statistics (%) Minority Female Value		
Census Codes used for RRA				

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals				
Factor 1: External Availability				
0137 Training and development managers	67	17	1	
0420 Social and community service managers	75	61	1	
0710 Management analysts	82	32	11	
0800 Accountants and auditors	76	63	1	
0910 Credit counselors and loan officers	82	73	1	
0950 Financial specialists, all other	90	60	1	
1006 Computer systems analysts	56	23	1	
1020 Software developers, applications and systems software	66	35	1	
1310 Surveyors, cartographers, and photogrammetrists	83	17	1	
2016 Social and human service assistants	100	76	16	
2840 Technical writers	0	0	1	
McAllen-Edinburg-Mission TX	1	Raw Statistics (%)		
Census Codes used for RRA		Minority	Female	Value
0137 Training and development managers		23	23	1
0420 Social and community service managers		87	79	1
0710 Management analysts		93	51	11
0800 Accountants and auditors		83	61	1
0910 Credit counselors and loan officers		84	32	1
0950 Financial specialists, all other		77	77	1

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor 1: External Availability

1006 Computer systems analysts			89	5	1	
1020 Software developers, applications and systems software			65	35	1	
1310 Surveyors, cartographers, and photogrammetrists			100	0	1	
2016 Social and human service assistants			100	71	16	
	Little Rock-North Little Rock-Conway AR	2	Raw Statistics (%)			
	Census Codes used for RRA		Minority	Female	Value	
0137 Training and development managers			31	50	1	
0420 Social and community service managers			21	69	1	
0710 Management analysts			28	50	11	
0800 Accountants and auditors			16	60	1	
0910 Credit counselors and loan officers			13	47	1	
0950 Financial specialists, all other			0	75	1	
1006 Computer systems analysts			19	44	1	
1020 Software developers, applications and systems software			16	28	1	
1310 Surveyors, cartographers, and photogrammetrists			35	65	1	
2016 Social and human service assistants			49	83	16	
2840 Technical writers			20	80	1	
	Alexandria LA	2	Raw Statistics (%)			
	Census Codes used for RRA		Minority	Female	Value	

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals						
Factor 1: External Availability						
0137 Training and development managers			0	100	1	
0420 Social and community service managers			38	31	1	
0710 Management analysts			4	52	11	
0800 Accountants and auditors			10	69	1	
0910 Credit counselors and loan officers			0	83	1	
0950 Financial specialists, all other			0	0	1	
1006 Computer systems analysts			0	33	1	
1020 Software developers, applications and systems software			84	0	1	
2016 Social and human service assistants			56	88	16	
	Amarillo TX	2				
	Census Codes used for RRA		Raw Statistics (%)			
			Minority	Female	Value	
0137 Training and development managers			74	56	1	
0420 Social and community service managers			36	81	1	
0710 Management analysts			5	40	11	
0800 Accountants and auditors			15	61	1	
0910 Credit counselors and loan officers			21	50	1	
0950 Financial specialists, all other			50	33	1	
1006 Computer systems analysts			34	39	1	
1020 Software developers, applications and systems software			17	36	1	

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals				
Factor 1: External Availability				
2016 Social and human service assistants		75	25	16
2840 Technical writers		0	100	1
	Brownsville-Harlingen TX	2		
	Census Codes used for RRA		Raw Statistics (%)	
			Minority	Female
				Value
0137 Training and development managers			100	0
0420 Social and community service managers			72	50
0710 Management analysts			84	33
0800 Accountants and auditors			83	64
0910 Credit counselors and loan officers			79	52
0950 Financial specialists, all other			100	75
1006 Computer systems analysts			31	15
1020 Software developers, applications and systems software			40	20
1310 Surveyors, cartographers, and photogrammetrists			100	0
2016 Social and human service assistants			94	86
	Shelby	3		
	Census Codes used for RRA		Raw Statistics (%)	
			Minority	Female
				Value
0137 Training and development managers			59	65
0420 Social and community service managers			50	59
0710 Management analysts			27	37

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals

Factor 1: External Availability

0800 Accountants and auditors			36	64	1	
0910 Credit counselors and loan officers			37	56	1	
0950 Financial specialists, all other			31	56	1	
1006 Computer systems analysts			48	42	1	
1020 Software developers, applications and systems software			51	26	1	
1310 Surveyors, cartographers, and photogrammetrists			0	29	1	
2016 Social and human service assistants			71	73	16	
2840 Technical writers			18	25	1	
	Fayetteville-Springdale-Rogers AR-MO	8				
	Census Codes used for RRA		Raw Statistics (%)			
			Minority	Female	Value	
0137 Training and development managers			0	52	1	
0420 Social and community service managers			0	79	1	
0710 Management analysts			11	50	11	
0800 Accountants and auditors			8	65	1	
0910 Credit counselors and loan officers			11	60	1	
0950 Financial specialists, all other			0	84	1	
1006 Computer systems analysts			8	43	1	
1020 Software developers, applications and systems software			58	13	1	
1310 Surveyors, cartographers, and photogrammetrists			0	0	1	

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

2 - Professionals					
Factor 1: External Availability					
2016 Social and human service assistants	20	80	16		
2840 Technical writers	0	100	1		
Raw Statistics (%)				Weighted Factor (%)	
	Minority	Female	Value	Minority	Female
Final Statistics for External Availability	36	61	80	29	49
Factor 2: Internal Availability					
Raw Statistics (%)					
Source Description	Minority	Female	Value		
3 - Technicians	57	43	2		
Raw Statistics (%)				Weighted Factor (%)	
	Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability	57	43	20	11	9

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

3 - Technicians

Factor	Description	<u>Raw Statistics</u>			<u>Weighted Factor</u>		Source of Statistics	Reason for Weighting
		Minority	Female	Weight	Minority	Female		
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	20	52	100	20	52	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	0	0	0	0	0	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
Job Group Size: 7		100						
		Final Availability (%)			20	52		

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

3 - Technicians

Factor 1: External Availability

External Availability from the RRA

Census Areas for RRA		Value				
	Montgomery AL	1				
	Census Codes used for RRA		<div>Raw Statistics (%)</div> <div>Minority Female Value</div>			
1965 Miscellaneous life, physical, and social science technicians			0	73	7	
	Fayetteville-Springdale-Rogers AR-MO	1				
	Census Codes used for RRA		<div>Raw Statistics (%)</div> <div>Minority Female Value</div>			
1965 Miscellaneous life, physical, and social science technicians			21	51	7	
	Brownsville-Harlingen TX	1				
	Census Codes used for RRA		<div>Raw Statistics (%)</div> <div>Minority Female Value</div>			
1965 Miscellaneous life, physical, and social science technicians			93	18	7	
	Oklahoma City OK	2				
	Census Codes used for RRA		<div>Raw Statistics (%)</div> <div>Minority Female Value</div>			
1965 Miscellaneous life, physical, and social science technicians			13	57	7	
	Tyler TX	2				
	Census Codes used for RRA		<div>Raw Statistics (%)</div> <div>Minority Female Value</div>			
1965 Miscellaneous life, physical, and social science technicians			0	56	7	

RRA = Reasonable Recruitment Area

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

3 - Technicians

	Raw Statistics (%)			Weighted Factor (%)	
	Minority	Female	Value	Minority	Female
Final Statistics for External Availability	20	52	100	20	52

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

5 - Administrative Support Workers

Factor	Description	<u>Raw Statistics</u>			<u>Weighted Factor</u>		Source of Statistics	Reason for Weighting
		Minority	Female	Weight	Minority	Female		
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	7	46	100	7	46	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	0	0	0	0	0	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
Job Group Size: 7		100						
		Final Availability (%)			7	46		

Availability Analysis

Plan Date: 08/01/2021

Communities Unlimited

5 - Administrative Support Workers					
Factor 1: External Availability					
External Availability from the RRA					
Census Areas for RRA			Value		
	Fayetteville-Springdale-Rogers AR-MO	7			
	Census Codes used for RRA				
			Minority	Female	Value
1310 Surveyors, cartographers, and photogrammetrists			0	0	2
5400 Receptionists and information clerks			17	90	1
5700 Secretaries and administrative assistants			11	93	1
			Raw Statistics (%)		Weighted Factor (%)
			Minority	Female	Value
			Minority	Female	
Final Statistics for External Availability			7	46	100
				7	46

RRA = Reasonable Recruitment Area

Placement Goals

Contractors and subcontractors must compare the percentage of minorities and women in each job group with the availability for those job groups as calculated in this AAP. 41 C.F.R. § 60-2.13 to 60.2.15. When the percentage of minorities or women in a job group is less than would be reasonably expected given their availability, contractors are required to establish placement goals, which also serve as reasonably attainable objectives to measure progress toward achieving equal employment opportunity. 41 C.F.R. § 60-2.16.

Contractors may use a number of methods to determine whether their actual employment percentage of minorities and/or females is lower than would reasonably be expected, including the need to set a placement goal when: 1) there is “any difference” between the availability percentage and the employment percentage; 2) actual employment is less than 80 percent of calculated availability (which is the expected representation); or, 3) the difference between the actual and expected employment is statistically significant. Any reasonable method, as long as it is uniformly applied, is acceptable to the OFCCP.

Placement goals are established as a percentage equal to the calculated availability and serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work. 41 C.F.R. § 60-2.16. **Although a contractor is required to make good faith efforts to meet its goals, the goals are not allowed under law to be quotas (with the exception of a few circumstances, such as when there is a court order to remedy prior unlawful discrimination.)**

Placement Goals

Plan Date: 08/01/2021

Communities Unlimited

Job Group	Group Size	Employment (%)		Availability (%)		Placement Goals* Needed		Annual Goal (%)	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1.1 - Executives/Senior Level Officials	7	29	86	14	38	No ¹	No ¹		
1.2 - First/Mid-Level Officials and Mana	10	40	30	39	44	No ¹	No ¹		
2 - Professionals	36	39	44	40	58	No ²	No ²		
3 - Technicians	7	57	43	20	52	No ¹	No ¹		
5 - Administrative Support Workers	7	14	71	7	46	No ¹	No ¹		

1 - Binomial Distribution
2 - Two Standard Deviations

*The establishment of a "Placement Goal" does not amount to an admission of impermissible conduct. It is neither a finding of lawful discrimination nor a finding of a lack of a good faith affirmative action efforts. Nor does the establishment of a Placement Goal permit unlawful discrimination. Rather the establishment of a "Placement Goal" is a technical targeting term used exclusively by affirmative action planners who seek to apply good faith efforts to increase in the future the percentage employment of minorities and women in the workforce.

Disparity Analysis

Contractors and subcontractors are required to include personnel activity (applicant flow, hires, terminations, promotions, and any other personnel actions) to determine whether there are selection disparities. 41 C.F.R. § 60-2.17 (b) (2).

The Disparity Analysis is a tool to measure the statistical relationship between two selected groups. The following report identifies whether the rates of those hired, promoted, or terminated are similar without regard to race or gender.

Disparity Analysis - Hires

Date Range: August 1, 2020 through July 31, 2021

Communities Unlimited

2 - Professionals											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non-Favored Hires	Non-Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	8	54	64	2	26	6	28	7.69%	21.43%	1.42	No
Black vs White	7	47	63	0	11	7	36	0.00%	19.44%	1.59	No
Hispanic vs White	7	42	63	0	6	7	36	0.00%	19.44%	1.18	No
Asian vs White	7	36	63	0	0 *	7	36	N/A	19.44%	N/A	No
Native American vs White	7	36	63	0	0 *	7	36	N/A	19.44%	N/A	No
Pacific Islander vs White	7	37	63	0	1 *	7	36	0.00%	19.44%	0.49	No
Two or More vs White	8	37	63	1	1 *	7	36	100.00%	19.44%	-1.93	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

* This group does not constitute at least 2% of the total pool.

Disparity Analysis - Hires

Date Range: August 1, 2020 through July 31, 2021

Communities Unlimited

3 - Technicians											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non-Favored Hires	Non-Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	5	11	6	2	7	3	4	28.57%	75.00%	1.49	No
Black vs Asian	1	1	7	0	0 *	1	1	N/A	100.00%	N/A	No
Hispanic vs Asian	2	3	7	1	2	1	1	50.00%	100.00%	0.87	No
Native American vs Asian	1	1	7	0	0 *	1	1	N/A	100.00%	N/A	No
Pacific Islander vs Asian	1	2	7	0	1	1	1	0.00%	100.00%	1.41	No
Two or More vs Asian	1	1	7	0	0 *	1	1	N/A	100.00%	N/A	No
White vs Asian	4	7	7	3	6	1	1	50.00%	100.00%	0.94	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

* This group does not constitute at least 2% of the total pool.

Disparity Analysis - Hires

Date Range: August 1, 2020 through July 31, 2021

Communities Unlimited

5 - Administrative Support Workers											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non-Favored Hires	Non-Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	4	6	1	0	1	4	5	0.00%	80.00%	1.55	No
Black vs Hispanic	1	1	1	0	0 *	1	1	N/A	100.00%	N/A	No
Asian vs Hispanic	1	1	1	0	0 *	1	1	N/A	100.00%	N/A	No
Native American vs Hispanic	1	1	1	0	0 *	1	1	N/A	100.00%	N/A	No
Pacific Islander vs Hispanic	1	1	1	0	0 *	1	1	N/A	100.00%	N/A	No
Two or More vs Hispanic	1	1	1	0	0 *	1	1	N/A	100.00%	N/A	No
White vs Hispanic	4	6	1	3	5	1	1	60.00%	100.00%	0.77	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

* This group does not constitute at least 2% of the total pool.

**Affirmative Action Program for
Protected Veterans**

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).

COMMUNITIES Unlimited, Inc.

AFFIRMATIVE ACTION PROGRAM FOR PROTECTED VETERANS

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

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Introduction

COMMUNITIES Unlimited, Inc. 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.

ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

Assessment: Communities Unlimited evaluated the effectiveness of outreach and recruitment efforts for qualified veterans during its prior AAP year. During that period, of the applicants who chose to complete the self-identification form, 7.79% self-identified as a protected veteran. As a result, Communities Unlimited will continue to review and analyze its existing outreach efforts and commit to continue to identify viable partners throughout the year.

DATA COLLECTION ANALYSIS 41 C.F.R. § 60-300.44(k)

Communities Unlimited documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three (3) years:

1. The number of applicants who self-identified as protected veterans pursuant to § 60-300.42(a), or who are otherwise known as protected veterans;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of protected veteran applicants hired; and
5. The total number of applicants hired.

See Protected Veterans Three Year Data Collection

Protected Veterans Three Year Data Collection

Communities Unlimited

Required Data	August 1, 2018 through July 31, 2019	August 1, 2019 through July 31, 2020	August 1, 2020 through July 31, 2021
Number of applicants who self-identify as protected veterans pre-offer	N/A	N/A	6
Total number of job openings	N/A	N/A	27
Total number of jobs filled	N/A	N/A	27
Total number of applicants for all jobs	N/A	N/A	152
Total number of protected veteran applicants hired	N/A	N/A	1
Total number of applicants hired	N/A	N/A	17

BENCHMARKS FOR HIRING 41 C.F.R. § 60-300.45

Benchmark: The purpose of establishing benchmarks is to create a quantifiable method by which Communities Unlimited can measure its progress toward achieving equal employment opportunity for protected veterans.

The benchmark is not a rigid and inflexible quota which must be met, nor is it considered either a ceiling or a floor for the employment of particular groups. Quotas are expressly forbidden.

Hiring benchmarks are set by Communities Unlimited on an annual basis. Communities Unlimited documents the hiring benchmark it has established each year. Communities Unlimited retains these records for a period of three (3) years.

The current benchmark for protected veterans for this location is set at 5.6%, which matches the national protected veteran benchmark.

Protected Veteran Hiring Ratio

Total Hires	17
Total Protected Veteran Hires	1
Percentage of Protected Veterans Hires	5.9%

This location will continue to implement additional recruitment efforts to attract qualified applicants, including protected veterans, for all job openings.

**Affirmative Action Program for
Individuals with Disabilities**

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
Plan Year**

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Introduction

COMMUNITIES Unlimited, Inc. 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.

ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

Assessment: Communities Unlimited evaluated the effectiveness of outreach and recruitment efforts for qualified individuals with disabilities during its prior AAP year. During that period, of the applicants who chose to complete the self-identification form, 6.49% self-identified as an individual with disability. As a result, Communities Unlimited will continue to review and analyze its existing outreach efforts and commit to continue to identify viable partners throughout the year.

DATA COLLECTION ANALYSIS 41 C.F.R. § 60-741.44(k)

Communities Unlimited documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three years:

1. The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of applicants with disabilities hired; and
5. The total number of applicants hired.

See Individuals with Disabilities Three Year Data Collection

Individuals with Disabilities Three Year Data Collection

Communities Unlimited

Required Data	August 1, 2018 through July 31, 2019	August 1, 2019 through July 31, 2020	August 1, 2020 through July 31, 2021
Number of applicants who self-identify as individuals with disabilities pre-offer	N/A	N/A	5
Total number of job openings	N/A	N/A	27
Total number of jobs filled	N/A	N/A	27
Total number of applicants for all jobs	N/A	N/A	152
Total number of applicants with disabilities hired	N/A	N/A	3
Total number of applicants hired	N/A	N/A	17

UTILIZATION ANALYSIS 41 C.F.R. § 60-741.45

41 CFR § 60-741.45 Utilization goals. The utilization goal is not a rigid and inflexible quota which must be met, nor is it considered either a ceiling or a floor for the employment of particular groups. These goals are not quotas.

Goal: OFCCP has currently established a utilization goal of 7 percent for employment of qualified individuals with disabilities for Communities Unlimited's entire workforce as provided in 41 CFR § 60-751.45(d)(2)(i).

Purpose. The purpose of the utilization goal is to establish a benchmark against which Communities Unlimited measures the representation of individuals within Communities Unlimited's entire workforce as provided in 41 CFR § 60-751.45(d)(2)(i). The utilization goal serves as an equal employment opportunity objective that should be attainable by complying with all aspects of the affirmative action requirements of the applicable Section 503 regulations.

Current Individuals with Disabilities Goal Results

Total Employees	67
Total Individuals with Disabilities	6
Current Individuals with Disabilities %	9%

This location has met or exceeded the goal established for individuals with disabilities.